

At: 86495

Rec'd via hard copy: 10/28/2024



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Submission of this No Exposure Certification constitutes notice that the entity identified below does not require permit authorization for its storm water discharges associated with industrial activity due to the existence of a condition of no exposure. This certification must be submitted every five years from the date of submittal.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, or waste product. A storm resistant shelter is not required for the following industrial materials and activities (40 CFR 122.26(g)(2)):

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of the conditional exclusion for "no exposure" of industrial activities and materials to storm water found in 40 CFR 122.26(g). Please mail the completed form to: Chief, Environmental Permits Division, Office of Pollution Control, P.O. Box 2261, Jackson, MS 39225

For this certification to be considered, all questions on this form must be answered. If an item does not apply to you, enter "NA" (for "not applicable") to show that you considered the question. All answers must be printed or typed.

Facility Operator Information (All correspondence will be sent to this address).

1. Contact Name: Billy Joe Jay 2. Phone Number: 601-409-0371
3. Legal Company Name: JWC Environmental LLC
4. Mailing Address: Street: P.O. Box 909
- City: Marion State: MS Zip Code: 39342
5. Email: bj@jwcenviro.com

Facility/Site Location Information (If no street address exists, provide the nearest named road [e.g., Intersection of Routes 9 and 55]. Do not use a P.O. Box number).

1. Facility Name: Lauderdale County Waste Transfer Station
2. Street Address: Southern Way Blvd
- City: Meridian County: Lauderdale Zip Code: 39301
3. Email: bj@jwcenviro.com

NO EXPOSURE CERTIFICATION

Facility/Site Location Information (Continued)

3. Latitude: 32 23 22.9 Longitude: 88 38 07.5 Source: GOOGLE EARTH

4. Nearest named receiving stream: Nanaby Creek

5. Was the facility or site previously covered under an NPDES storm water permit? Yes No

If yes, enter the NPDES permit or coverage number: _____

6. Does this facility have other environmental permits? Yes No

If yes, provide type (Air, Hazardous Waste, NPDES, Pretreatment, State Operating) and permit number

SW0380060622

7. SIC/Activity Codes: Primary: 4212 Secondary (if applicable): _____

Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?
(Please check either "Yes" or "No".)

	Yes	No
1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Materials or residuals on the ground or in storm water inlets from spills/leaks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Materials or products from past industrial activity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Material handling equipment (except adequately maintained vehicles)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Materials or products during loading/unloading or transporting activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Application or disposal of process wastewater (unless otherwise permitted)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you answer "Yes" to any of these questions (1) through (11), you are not eligible for the no exposure exclusion and must be covered by an NPDES Storm Water Permit (individual permit or coverage under a general permit.)

NO EXPOSURE CERTIFICATION

Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to MDEQ and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the MDEQ or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility. I understand that a copy of this certification must be retained at the facility.

Additionally, 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.

Print Name¹: Billy Jay

Print Title¹: Owner

Signature¹: Billy Jay

Date: 10-21-22

¹Certification shall be signed according to the Mississippi Water Pollution Control Regulations (11 Miss. Admin. Code Pt. 6, R. 1.1.2.C(1).)
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, mayor, or ranking elected official.

Instructions and Additional Information

Law

Federal law at 40 CFR Part 122.26 prohibits point source discharges of storm water associated with industrial activity to waters of the U.S. without a National Pollutant Discharge Elimination System (NPDES) permit. However, according to 40 CFR 122.26(g), NPDES permit coverage is not required for discharges of storm water associated with industrial activities identified at 40 CFR 122.26 (b)(14)(i)-(ix) and (xi) if the discharger can certify that a condition of "no exposure" exists at the industrial facility or site. Storm water discharges from construction activities identified in 40 CFR 122.26(b)(14)(x) are not eligible for the no exposure exclusion. Submission of this No Exposure Certification constitutes notice that the entity identified above does not require permit authorization for its storm water discharges associated with industrial activity due to the existence of a condition of no exposure.

Obtaining and Maintaining the No Exposure Exclusion

This form is used to certify that a condition of "no exposure" exists at the industrial facility or site described herein. By signing and submitting this No Exposure Certification form, the entity is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g). A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion. If conditions change resulting in the exposure of materials and activities to storm water, the facility operator must obtain coverage under an NPDES storm water permit immediately. This certification must be resubmitted at least once every five years. The "no exposure" certification is non-transferable.

Instructions for Determining a Facility's Latitude and Longitude

Enter the latitude and longitude of the facility entrance in degrees/minutes/seconds. Latitude and longitude can be obtained from United States Geological Survey (USGS) quadrangle or topographic maps, GPS, or by accessing web sites that have latitude and longitude finders.

Latitude and longitude for a facility in decimal form must be converted to degrees (°), minutes (') and seconds (") for proper entry on the certification form. To convert decimal latitude or longitude to degrees/minutes/seconds, follow the steps in the following example.

Example: Convert decimal latitude 45.1234567 to degrees (°), minutes ('), and seconds (").

- The number to left of the decimal point are the degrees: 45°
- To obtain minutes, multiply the first four numbers to the right of the decimal point by 0.006: $1234 \times 0.006 = 7.404$
- The numbers to the left of the decimal point in the result obtained in (b) are the minutes: 7'.
- To obtain seconds, multiply the remaining three numbers to the right of the decimal from the result obtained in (b) by 0.06: $404 \times 0.06 = 24.24$. Since the numbers to the right of the decimal point are not used, the result is 24".
- The conversion for 45.1234567 = 45° 7' 24".

PLAN OF OPERATION

JWC Environmental Transfer Station

This Operating Plan is for the proposed Transfer Station to be located on the west side of Handy Blvd, South of the Mississippi Highway Patrol Office. The Waste Transfer Station is designed to efficiently manage the collection, sorting, and transfer of approximately 70-100 tons of waste materials per day, from Meridian, MS and surrounding areas, in a safe and environmentally responsible manner. The facility operates six days a week for eight hours each day. The transfer station is proposed to be enclosed and approximately 5,000 square-feet in size with a 300 square-foot equipment area, a 3,600 square-foot collection area with drive through direct dump floor, as well as associated restrooms, showers, offices, storage, and outdoor truck scales. Recycling area with recycling bins will be a covered area attached to the main transfer station structure. Interior lab will have relocatable 4-foot concrete push walls at various locations for the roll-up door application, as well as washdown perimeter drains. Direct dump floor will have metal chutes to direct waste into walking floor transfer trucks. Retractable garage doors will be opened as necessary to adhere to any traffic that may flow through the facility. Doors will remain closed until facility entrance is required/approved by visual waste screening. Upon facility entrance and during waste dumping, the final screening process will occur. During this process, segregation of material will occur via hand screening for uncontaminated waste materials to be recycled in an attempt to properly regulate waste and volume. The appropriate recyclable materials will be transferred to the proper roll off container located in the recycling section. JWC anticipates primary traffic flow to consist of civilian/pedestrian waste traffic to enter the first bay door in the Collection Area while the remaining two bay doors will be primarily used to facilitate commercial waste traffic. The fourth bay door is designated for the drive-through flow of transfer trucks. A JWC staff member will be continually monitoring traffic flow to ensure the correct facility entrances are used. (Floor Plan, pg. 3). Permitted waste materials to include household garbage, residential and commercial garbage, and small construction debris. Metals, cardboard, papers will be accepted recyclables as well. The aforementioned recyclables will be sorted and stored into roll-off containers in the Recycling section of the property shown on the page 3. Customers intending to drop off recyclable materials only will be directed immediately after initial screening to the Recyclables station and directed to the proper roll-off bin. Recyclables will be transported at a minimum once weekly to the following destinations: Metals to be directly loaded and transported to Harper Scrap and Recycling and Southern Scrap of Meridian, LLC on a weekly basis, or as needed. Papers/cardboard materials are to be baled at the Equipment section of the facility and transported to Atlas of Meridian weekly, or as needed. All household garbage and commercial garbage will be stored in a manner to prevent any harborage for animals, fires, or additional safety hazards. These wastes will be transported off-site a minimum once daily to a permitted municipal solid waste landfill. Hours of operation are to be Monday-Friday (9:00AM to 5:00 PM) and Saturdays (8:00AM to 1:00 PM).

I. Waste Screening

1. Screening Phases:

- o Multiple trained personnel conduct waste load screening, beginning at the on-site weight scale.
 - o Secondary screening takes place at collection area/drive-thru entrance and prior to unloading.
 - o Final screening occurs during unloading, any unauthorized waste will not be permitted to be unloaded and will be sent off premises with the customer.
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II. Tipping Floor Operations:

1. *Waste Unloading:*
 - Waste collection vehicles unload directly onto the tipping floor.
 - Trained personnel oversee the unloading process to ensure safety and compliance with waste handling procedures.
2. *Sorting and Segregation:*
 - On the tipping floor, waste is sorted into different categories (recyclables, non-recyclables).
 - Dedicated areas for specific waste types are marked to streamline the sorting process.
 - Two trained personal will oversee direct dump activities and manually screen waste materials for cull and segregation or unauthorized waste. A trained equipment operator will be pushing waste material from direct dump floor to metal chutes and into transfer trucks.

III. Daily Cleaning Routines:

1. *Floor Cleaning:*
 - Daily cleaning schedules include sweeping, washing, and disinfecting the dump to floor and sorting areas.
 - Daily collection of litter found in and around the perimeter of the facility will occur before the end of operation hours.
2. *Equipment Maintenance:*
 - Regular maintenance checks for machinery and equipment to ensure smooth operations and reduce downtime.
 - Scheduled inspections and lubrication of conveyor belts, compactors, and other machinery.

IV. Fire Prevention Plan:

1. *Fire Suppression Equipment:*
 - Installation of fire extinguishers, sprinkler systems, and fire hoses strategically placed throughout the facility.
 - Regular maintenance and testing of fire suppression equipment.
2. *Combustible Material Management:*
 - Segregation of combustible materials to minimize fire risks.
 - Strict enforcement of no-smoking policies within the facility.

V. Odor Filtration System:

1. *Installation of Odor Control Devices and Ventilation System:*
 - Utilization of state-of-the-art odor filtration systems to minimize unpleasant smells.
 - Airstreme® Odor control Equipment System offered by ECOLO Odor Control Technologies Inc. combined with their Airsolution odor neutralizers will prevent odor from releasing onto the environment.

VI. On-Site Wastewater Treatment:

1. *Wastewater Collection and Treatment:*
 - Collection of runoff and wastewater from cleaning activities.
 - On-site wastewater treatment facility to remove contaminants prior to receiving from onsite holding tank. Then discharged to City Sewer and retreated.
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2. *Compliance with Environmental Regulations:*

- Strict adherence to local environmental regulations regarding wastewater discharge.
- Regular monitoring and reporting to ensure compliance with established standards.

VII. Security and Accessibility:

1. *Fencing and Security Measures:*

- Perimeter fencing to secure the facility.
- Security surveillance systems to monitor and prevent unauthorized access. License plate and drivers license validation required upon entry.

2. *Operational Hours:*

- The facility operates six days a week, eight hours a day, to ensure effective waste management without disrupting the surrounding community.

3. *Scales:*

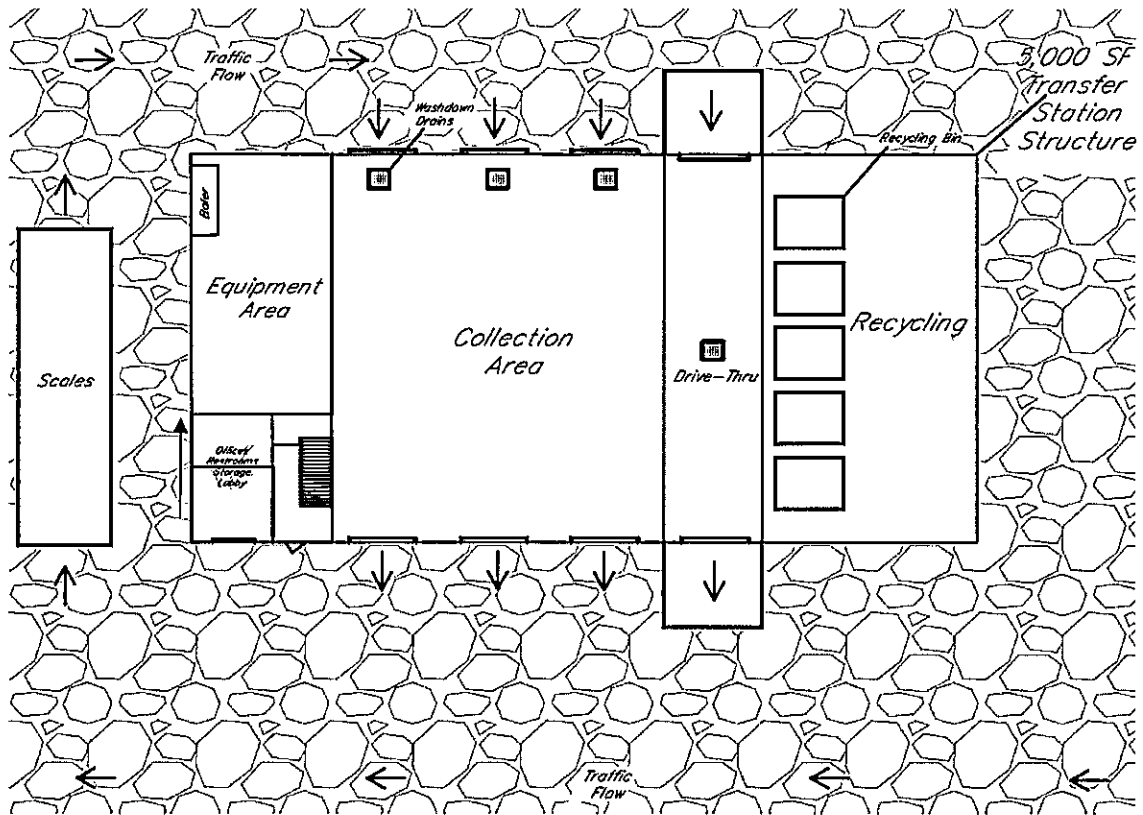
- Truck scales by Fairbanks Scales to be in compliance with all regulations of Weights and Measures Division of the Mississippi Department of Agriculture.
- All vehicles will be scaled upon arrival and departure of facility.
- Scales will be used to report annual facility tonnage via load tickets, physical and digitally retained. This report will be issued by February 28th of each year. The report will include the total amount of waste reviewed at the facility (in tons), the county and state of origin, and the sites where waste was sent for final disposal. This facility, and its record keeping will remain in compliance with Miss Code Ann. §17-17-219.

VIII. Emergency Response:

1. *Emergency Procedures:*

- Clearly defined emergency response procedures in case of accidents, spills, or other unforeseen events. (JWC Environmental Emergency Response Procedures)
 - Regular training sessions for staff on emergency protocols with designated safety officer.
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VIII. Floor Plan



IX. Equipment

1. Equipment Area

- All equipment will be staged in the Equipment Area as shown in the floor plan provided. On-site equipment will include baler and skid steer with dozer blade attachments.

IIX. Waste Management

1. Waste Screening
2. Scaling
3. Sorting
4. Storage / Paper Materials Baling
5. Waste Distribution
6. Cleaning

Engineering Plus, Inc.

Planning • Surveying • Testing • Landscape Design

October 23, 2024

RECEIVED

OCT 28 2024

Mr. William Stacy
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225

Dept. of Environmental Quality


Re: *JWC Environmental Waste Transfer Station – No Exposure Certification for Exclusion
from NPDES Storm Water Permitting
Lauderdale County, MS*

Dear Mr. Stacy

This letter is to address the JWC Environmental Waste Transfer Station's request for consideration to the No Exposure Certification for Exclusion from NPDES Storm Water Permitting. Attached you will find the No Exposure Certification form as well as the facilities plan of operation.

Please feel free to contact me with any questions.

Sincerely,



Lucas Leeper, P.E.
Project Engineer
Enclosure: As noted