AI: 85476

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Rec'd via email: 01/29/2024

INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

FOR COVERAGE UNDER THE INDUSTRIAL STORMWATER GENERAL NPDES PERMIT MSR00 2526

(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: Bill Paul **Position:** Sr. Vice President

Owner Company Name: Alden Group Renewable Energy

Owner Street (P.O. Box): 9595 Six Pines Drive, Suite 6370

Owner City: The Woodlands **State:** TX **Zip:** 77380

Owner Phone Number: (832) 400-1239 **Owner Email:** bpaul@AldenGroup.com

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: Bill Paul **Position:** Sr. Vice President

Operator Company Name: Alden Group Renewable Energy

Operator Street (P.O. Box): 102 Industrial Park Rd, Raleigh, MS 39153

Operator City: Raleigh **State:** MS **Zip:** 39153

Operator Phone Number: (832)400-1239 **Operator Email:** bpaul@AldenGroup.com

O.C

FACILITY INFORMATION

Facility Name: Alden Group Renewable Energy

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

SIC Code: ___ ___ ___ ___ Other Nonhazardous Waste Treatment and Disposal NAICS Code 562219

Receiving Stream: Clear 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: 102 Industrial Park Road **City:** Raleigh

County: Smith **Zip:** 39153

Latitude: 32 degrees 2 minutes 18.2868 seconds **Longitude:** 89 degrees 32 minutes 34.0836 seconds

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

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):**

Note: Pretreatment Application in process to determine if necessary

How will sanitary sewage be collected and treated? Raleigh Municipal Wastewater

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

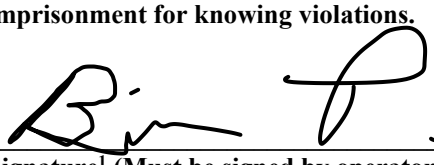
N/A

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)

11/13/2023

Date Signed

Bill Paul

Printed Name[1]

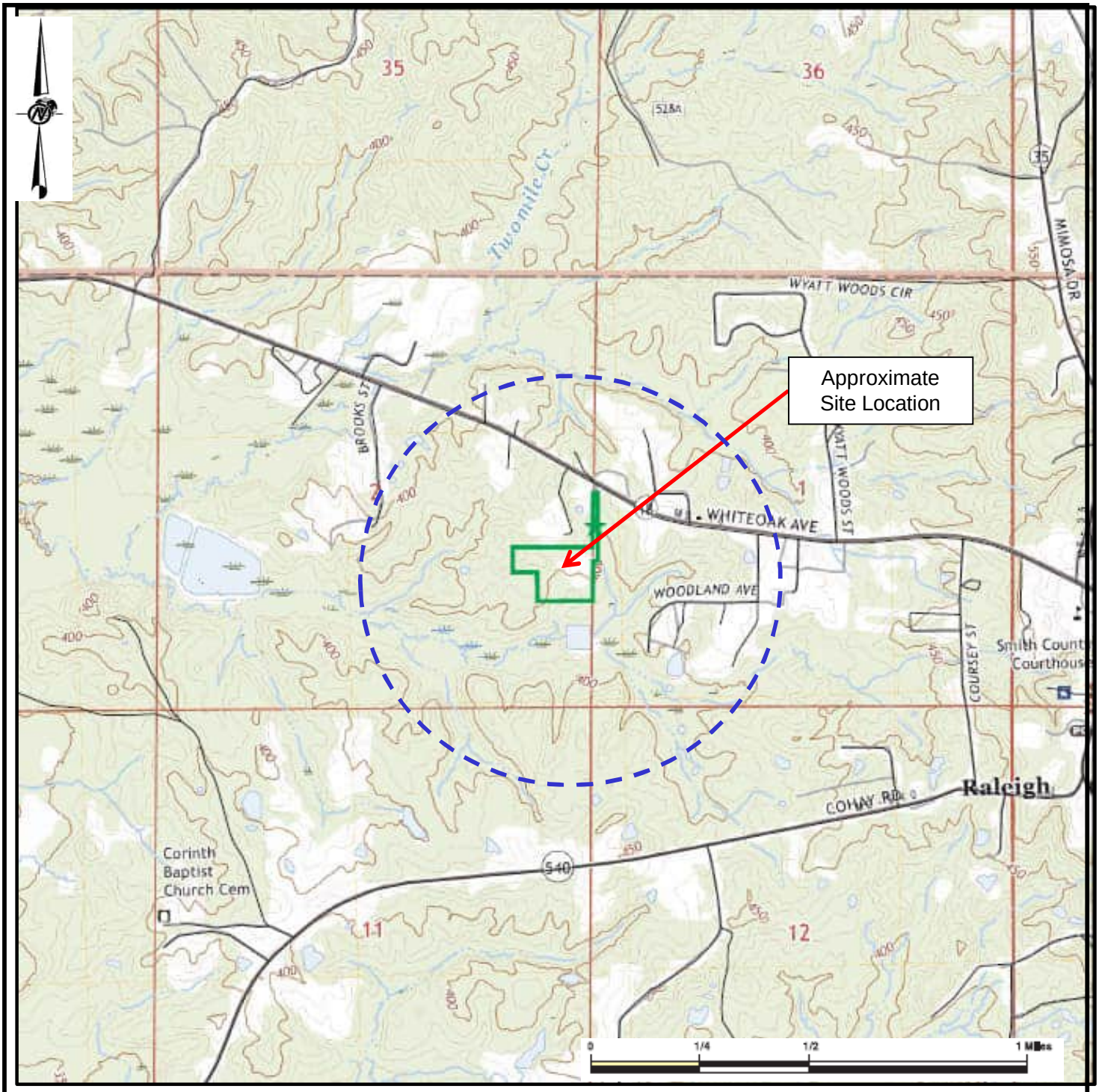
Sr VP Operations

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



Reference: The EDR Radius Map™ Report with Geo Check®, 102 Industrial Park Rd102 Industrial Park Rd Raleigh, MS 39153, January 28, 2022, Map for 2020 Raleigh, MS.

CLIENT/PROJECT **102 Industrial Park Rd** **Raleigh, MS 39153**		USGS TOPOGRAPHIC MAP: RALEIGH MAP YEAR: 2020 SERIES: 7.5 SCALE: 1:24000
TITLE **Site Location Map**		

DRAWN	CHECKED	REVIEWED	DATE	SCALE	JOB NO.	FIGURE
TK	CH	AWD	11-07-23	As Shown	31405045.001	**1**

STORM WATER POLLUTION PREVENTION PLAN

Alden Group Renewable Energy
102 Industrial Park Rd, Raleigh MS 39153

Submitted to:

Alden Group Renewable Energy

9595 Six Pines Drive, Suite 6370
The Woodlands, Texas 77389

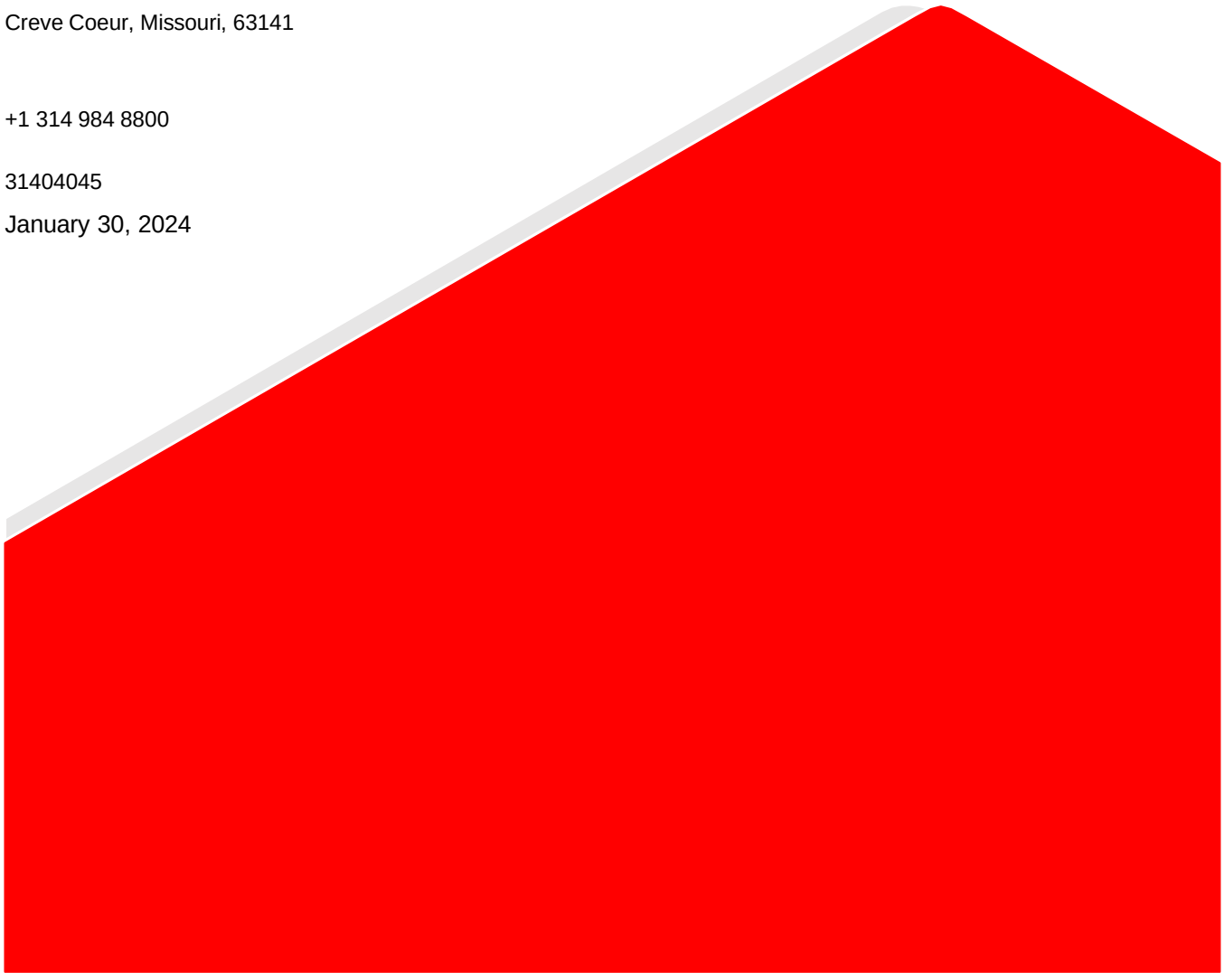
Submitted by:

WSP USA Inc.
701 Emerson Road, Suite 250
Creve Coeur, Missouri, 63141

+1 314 984 8800

31404045

January 30, 2024



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Appendix B - Quarterly Storm Water Monitoring and Inspection Forms
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1.0 SITE INFORMATION

1.1 Purpose

The purpose of this Stormwater Pollution Prevention Plan (SWPPP) is to identify potential pollution sources and practices that can be used to minimize and control pollutants in storm water runoff at the Alden Group Renewable Energy (AGRE) Site located at 102 Industrial Park Road, Raleigh, Mississippi (Subject Property). This document will serve as a guide to assist AGRE in identifying possible sources of storm water pollution and to implement Best Management Practices (BMPs) to minimize pollution in storm water discharges at the site. This plan should be reviewed by the operator and consulted as needed to address specific questions regarding facility compliance.

The control measures outlined in this plan have been developed to meet the requirements for the SWPPP listed in Act 5 of the Industrial Stormwater General Permit. Act 5 of the Industrial Stormwater General Permit outlines specific requirements of the operating permit for the Site. A copy of the operating permit for this facility is included in Appendix A and should be consulted as needed to address specific questions of compliance.

1.2 General Site Information

The AGRE facility is located at 102 Industrial Park Road, Raleigh, Mississippi 39153, in Smith County. The facility is bordered by an agricultural property and Highway 18 to the north, residential properties to southwest, and vacant wooded properties to the south and east. The facility is approximately 12.81 acres and slopes downward to the southeast. The location of the facility and surrounding areas are shown on Figure 1.

The facility has not had a spill or release of a reportable quantity of oil or other contaminant into the environment. AGRE will maintain a record of any reportable spills.

1.3 Facility Operations

The Raleigh facility is owned by AGRE of The Woodlands, Texas. AGRE processes oil waste from food manufacturing or cooking operations for use as biodiesel. The facility consists of three vacant building structures: one-single-story 44,300-square-foot building (Building 1), one-single-story 850-square-foot open pavilion (Building 2), and one single-story 250 square-foot building (Building 3). Historical uses included office and manufacturing space (Building 1), rest area (Building 2), and space utilized by Maxx South Broadband (Building 3).

1.4 Regulatory Background

The U.S. Environmental Protection Agency (EPA) developed the storm water regulatory program through the authority of the Clean Water Act amendments of 1987, to reduce discharges of contaminated storm water associated with industrial facilities. The National Pollution Discharge Elimination System (NPDES) program is the means by which the EPA regulates discharges of potentially contaminated wastewater and storm water into waters of the United States through the issuance of permits applicable to specific sources. Storm water general permits are available for coverage of certain industrial sectors, which have a relatively low potential for releasing pollutants into storm water. The State of Mississippi has developed the Industrial Stormwater Permit, which is the NPDES permit for storm water discharges from industrial activities in the State of Mississippi. In many cases, a site-specific permit is issued with respect to the characteristics of and conditions at a particular facility. A site-specific permit specifically addresses the type of activity at the facility, the nature of its discharge and the characteristics of the receiving water.

This plan is intended to fulfill the operating permit requirements for a site-specific SWPPP.

1.5 Permit Requirements

The requirements for an Industrial Stormwater Permit in the state of Mississippi are outlined in Act 16 of the Industrial Storm Water General Permit for Industrial Activities released by the Mississippi Department of Environmental Quality (MDEQ). The permit requirements outlined in Act 16 do not supersede federal NDPES regulations.

1.6 Plan Availability

A copy of this plan will be maintained at the site and will be made available to the MDEQ or other interested parties as required by the operating permit. A copy of this plan must be maintained at the site at all times. The site will make this plan, site compliance inspection reports, or other information available upon request to the MDEQ, the USEPA, or any other authorized representative of these agencies.

1.7 Plan Compliance

This SWPPP is a "living" document that is updated following the procedures set forth in this plan. The SWPPP shall describe and ensure the implementation of best management practices which will reduce pollutants in stormwater discharges and assure compliance with the terms and conditions of this permit. A summary of the required inspection and monitoring activities is listed below.

2.0 Pollution Prevention Committee [ACT 5, T-6 (1)]

Table 1: Pollution Prevention Committee

AGRE Spill Response Team Contacts (1 required)			
Name	Title	Phone Number(s)	
Gary Claborn	Regional Operations Manager	Cellular:	(769) 232-0133
Federal, State & Local Agencies		**Phone Number(s)**	
National Response Center (NRC)		1(800) 424-8802	
Mississippi Emergency Management Agency		(601) 933-6362 or (800) 222-6362	
U.S. EPA Region 4		1(800) 241-1754	
MDEQ Emergency Release Hotline		1(800) 222-6362	
Smith County Emergency Management		(601)-782-9151	
Local Emergency Contacts		**Phone Number(s)**	
Raleigh Police Department		911 (Emergency) 601-782-9992 (Non-Emergency)	
Raleigh Fire Protection District		911 (Emergency) 919-996-6392 (Non-Emergency)	
Jasper General Hospital Emergency Department – Jasper General Hospital		911 (Emergency) 601-764-2101 (Non-Emergency)	
Local Utility Companies			
Entergy Mississippi Inc.(Electric)		(601) 969-2336	
Atmos Energy Corporation (Gas)		(601) 420-5000	
Spill Response Contractors		**Phone Number(s)**	
US Environmental Services		(888) 279-9930	
E3 OMI		1(844) 333-0939	
In Transit Environmental Services		(601) 212-1459	

3.0 Risk Identification and Assessment/Material Inventory [ACT 5, T-6 (2)]

The table below identifies the tanks and containers at the facility with the potential for an oil discharge, the mode of failure, the flow direction and potential quantity of the discharge, and the secondary containment method and containment capacity that is provided.

Table 2: Potential Discharge Volume and Direction of Flow

Location or Container	Type of Failure	Probable Discharge Rate	Potential Discharge Volume (gallons)	Direction of Flow for Uncontained Discharge	Secondary Containment Method	Secondary Containment Capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers						
Above Ground Storage Tanks (14)	Failure of automatic pump shut-off, Tank seam failure	Gradual to instantaneous	0-22,000	Towards secondary containment trench via sloped floors and berms.	Spill catchment trench slump, spill response vacuum trucks	24,000 (trench), 8 x 5,000 (vacuum trucks)
ISO tanks (6)	Failure of automatic pump shut-off, Tank seam failure	Gradual to instantaneous	0-22,000	Towards secondary containment trench via sloped floors and berms.	Spill catchment trench slump, spill response vacuum trucks	24,000 (trench), 8 x 5,000 (vacuum trucks)
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)						
Truck loading bay, truck unloading bay	Fitting leak or failure; seal or seam failure	Gradual to instantaneous	<1 – 200	Towards secondary containment trench via sloped floors and berms.	Spill catchment trench slump, spill response vacuum trucks, spill response equipment (absorbent pads, universal pillows)	24,000 (trench), 8 x 5,000 (vacuum trucks)
Piping, Valves, etc.						

Location or Container	Type of Failure	Probable Discharge Rate	Potential Discharge Volume (gallons)	Direction of Flow for Uncontained Discharge	Secondary Containment Method	Secondary Containment Capacity (gallons)
Piping between 8 22,000 ASTs	Fitting leak or failure; seal or seam failure	Gradual to instantaneous	<1 – 1,000	Towards secondary containment trench via sloped floors and berms.	Spill catchment trench slump, spill response vacuum trucks, spill response equipment (absorbent pads, universal pillows)	24,000 (trench), 8 x 5,000 (vacuum trucks)
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)						
Truck loading bay, truck unloading bay	Fitting leak or failure; seal or seam failure	Gradual to instantaneous	<1 – 200	Towards secondary containment trench via sloped floors and berms.	Spill catchment trench slump, spill response vacuum trucks, spill response equipment (absorbent pads, universal pillows)	24,000 (trench), 8 x 5,000 (vacuum trucks)
Other Oil-Handling Areas or Oil-Filled Equipment						
None						

4.0 Sediment and Erosion Prevention [ACT 5, T-6 (3)]

This SWPPP requires the facility to provide sediment and erosion control sufficient to prevent or control sediment loss from the site. Sediment and erosion control should be developed in compliance with general water quality criteria, effluent limits and/or benchmarks detailed in the permit. Site-specific sediment and erosion control procedures are listed in the table below:

Table 3: Sediment and Erosion Control

Location	Activities	Sediment and Erosion Control Procedures
Plant Access Road	All traffic entering or leaving the site	Pavement of all site access roads. Roads and drainage ditches and discharge cuts protected with BMPs. Routine inspections of road, drainage ditches and discharge cuts.
Various unpaved facility grounds	General site traffic and activities.	Diversion of runoff to settling ponds, vegetation, landscaping, and screens as necessary to control sediment loading.

5.0 Preventive Maintenance [ACT 5, T-6 (4)] and good House Keeping, [ACT 5, T-6 (5)]

5.1 Best Management Practices

BEST MANAGEMENT PRACTICES (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to waters of the United States. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

BMPs are described in this section for each of the potential pollutant sources listed in Section 4.0. These BMPs include measures (non-structural or procedural) and controls (structural or preventative) implemented to promote good housekeeping, preventative maintenance, spill prevention and response procedures, inspections, employee training, recordkeeping, and non-storm water discharge. Materials will be managed to minimize the potential for contact with storm water. The operating permit requires the following minimum BMPs:

- Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, or warehouse activities and thereby prevent the contamination of storm water from these substances.
- Provide collection facilities and arrange for proper disposal of waste products including but not limited to petroleum waste products and solvents.
- Store all paint, solvents, petroleum waste products (except fuels), and storage containers (such as drums, cans, or cartons) so that these materials are not exposed to storm water

or provide other prescribed BMP's such as plastic lids and/or portable spill pans to prevent the commingling of storm water with container contents. Commingled water may not be discharged under this permit. Provide spill prevention control, and/or management sufficient to prevent any spills of these pollutants from entering waters of the state. Any containment system used to implement this requirement shall be constructed of material compatible with the substances contained and shall also prevent the contamination of groundwater.

- Provide good housekeeping practices on the site to keep solid waste from entry into waters of the state.
- Provide sediment and erosion control sufficient to prevent or control sediment loss off the property. This could include the use of straw bales, silt fences, or sediment basins, if needed, to comply with effluent limits.

The site has implemented the following structural and non-structural control measures: settling ponds, good housekeeping practices, training, and concrete roads. Additional site-specific BMPs are listed in Table 6. The BMPs listed in Table 6, as applicable, will be inspected during the monthly CSCE. Inspection reporting forms are available in Appendix B.

5.1.1 Overflow Containment

Fuel levels in the bulk storage tanks are determined using automatic gauges and pumps will shut off when a certain level is reached. Overflow capacity is considered 1,000 gallons less than total tank capacity.

5.1.2 Secondary Containment

Facility management has determined that use of the secondary containment and readily available spill response equipment to prevent discharged oil from reaching navigable waters is practical and effective for all portions of the facility.

To prevent spills, unloading operations depend on proper procedures and training of oil delivery vehicle drivers and AGRE employees, well-maintained equipment, and the availability and use of sorbent and storm drain/curb inlet sealing materials that can be quickly deployed in the event of a spill. Approximately 5 to 10 tanker trucks get unloaded onsite per day and up to 4 loads are transported from the site per day.

5.1.3 Designated Washout Areas

There is a grated catchment area (trench sump) in the warehouse level in place to catch any leaks or spills. The capacity of the secondary containment structure is 24,000 gallons and the maximum capacity in tanks is 1,000 gallons less than total tank capacity. All tanker trucks perform loading and unloading over the top of the catchment area to prevent spills. In the event of a spill or release, spill response equipment will be deployed. Containment equipment and diversionary structures will allow AGRE to contain oil-product releases on-site until clean up can occur. Emergency response contractors will be contacted in the event that AGRE cannot contain a spill or release.

Diked secondary containment structures are observed at the truck loading station and the truck unloading station. Stormwater is processed as inbound waste.

5.2 Vehicle Fueling and Maintenance Practices

This procedure is applicable to all bulk material transfer processes from a tanker truck to the bulk storage tank and from the bulk storage tank to the integrated emergency generator fuel tanks. All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation. AGRE ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading products, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose. Loading and unloading operations cannot be left unattended.

6.0 Spill Prevention and Response Procedures [ACT 5, T-7 (6)]

In the event of a significant leak or spill of oil or other hazardous substance, the procedures set forth in the Spill Prevention, Control and Countermeasures (SPCC) Plan for this site shall be followed. The SPCC Plan is available upon request.

6.1 Emergency Response Plan

The spill response procedures listed below will generally be followed, as appropriate, for situations involving spills or releases. Procedures are reviewed and upgraded when appropriate to improve operations and reduce the possibility of petroleum product spills. Under no circumstances should any person undertake cleanup activities for which they have not received proper training.

1. Evaluate the situation for personnel safety:
    - Evacuate personnel away from the spill area and areas where vapors may travel or accumulate.

2. Stop the release if safely possible:
    - Close valves.
    - Close off small holes with nonmetallic expandable rubber plugs or caps.
    - Remove product from the tank to below the level of hole where the product is being released, if applicable.
3. Identify and mitigate fire, explosion, and vapor hazards:
    - Eliminate possible sources of ignition.
    - Extinguish fires.
    - Remove or shut off engines, if necessary.
    - Shut off or isolate electrical power, if necessary.
4. Contain the spill and stop it from spreading:
    - Soak up spill with absorbent materials.
    - Identify drainage routes of spill and locate capture site to prevent spill from reaching storm water drains.
    - Seal storm drains with storm drain covers.
    - Isolate the drainage to a capture site using dikes constructed of sand, soil, liners, booms, absorbent pillows, etc.
    - Install ‘CAUTION’ tape or other temporary barriers to prevent unauthorized personnel from entering the spill area.
5. Notify the Facility Manager
    - Secure on-site equipment and personnel.
    - Define the size, position, content, direction, and speed of movement, risk to on-site and off-site human health and safety, likelihood of reaching sensitive habitats, and the extent of environmental harm which may result.
    - Determine if the release is “reportable” by regulation to the City, County, ODEQ and/or USEPA.

6. Cleanup spill and/or assist spill response contractor:
    - Continue to monitor and mitigate fire and safety hazards posed by vapors or free product.
    - Ponded product may be pumped or vacuumed into storage tanks or 55-gallon drums for off-site removal. Pumping or vacuum equipment shall be explosion proof or HAZMAT rated. Any recovered product that will not be reused shall be disposed of according to applicable state and federal requirements.
    - Storage of collected product shall be placed inside secondary containment.
    - If absorbent pads or booms are used to remove the product, wringing of free product into drums (for recycling or reclaiming the product) would be implemented first. Then sorbents will be containerized and disposed of properly.
    - Clean the affected ground surface of residual product.
    - Dispose of all contaminated soils/debris and cleanup materials properly and according to applicable state and federal requirements.
    - Final treatment and remediation for the site cleanup are beyond the scope of this document. A site-specific remediation plan will be developed as necessary by the facility.
7. Report and document:
    - Document the spill as outlined in Section 11.2.
    - Complete the *Discharge Reporting Form* included in Appendix E and notify the proper authorities, as outlined in Section 11.2 below.
    - After cleanup is complete, the SPCC Coordinator will review the spill report for additional spill prevention procedures.

7.0 Employee Training [ACT 5, T-7 (7), also ACT 12)]

Facility personnel who handle oil and fuel products shall participate in annual training that teaches them to perform their duties in a way to prevent the discharge of harmful quantities of oil or hazardous substances. New oil-handling personnel shall be instructed within one week after entering the facility. Transient personnel shall be advised of applicable spill prevention measures upon entering the facility.

All initial training shall be conducted by, or under the supervision of, the SPCC Coordinator or their designated representative. Supervisors may then conduct training for facility workers. Training must be conducted a minimum of once annually to assure adequate understanding of the following topics:

- General facility operation and contents of the SPCC Plan.
- Operation and maintenance of equipment, including oil transfer procedures, to prevent discharge of oil.
- Spill and emergency response procedures, including reporting, stopping, containing, cleaning up, and disposing of all spill materials, as well as emergency communications.
- Any known discharges or failures, malfunctioning components and any recently developed precautionary measures.
- Applicable pollution control laws, rules, and regulations.
- In-house inspection forms for equipment.

Records of training are maintained on-site in the same appendix included in employee records.

8.0 Visual Site Inspections [ACT 5, T-8 (9)]

The personnel performing inspections shall be knowledgeable about storage facility operations, the type of container and its associated components, and characteristics of the liquid stored. Records of inspections signed by the inspector must be kept with this Plan for at least three years within Appendix A. All tanks containing oil products shall be examined visually for physical condition and the need for maintenance on a monthly basis by an inspector who is familiar with the facility and can identify changes and developing problems. The Steel Tank Institute (STI) SP001 industry standard was considered during development of the inspection program for the facility. At a minimum, the visual inspection will include the following items as applicable:

- Containment structures should be checked for water, debris, fire hazards, and signs of leakage.
- Liquid level gauges (if applicable) or other overfill prevention systems should be operational and in good condition.
- The outside of the containers shall be observed for visible signs of leakage around the tank, foundation, and containment structure. Any deficiencies found shall be promptly repaired.

- All aboveground valves, hoses, and piping shall be examined for general condition of items such as supports, flange joints, expansion joints, valve glands and bodies, locking mechanisms, metal surfaces and drip pans. Any faulty equipment found shall be promptly repaired or replaced.
- The area surrounding the tanks is inspected for proper drainage. Any ground settling or ponding of water observed near the tank is promptly corrected.
- Spill response equipment shall be examined for inventory to ensure sufficient spill response capacity is available.
- Oil-filled operational equipment shall be inspected monthly for signs of deterioration, corrosion, and need for regular maintenance.
- Steam return or exhaust lines for the steam coils should be monitored for oil contamination from tank products.

Formal integrity testing is not required for any container at the AGRE facility. Monthly visual inspections have been deemed sufficient for verifying container integrity, which is consistent with the STI SP001 standard.

9.0 Storm Water Management [ACT 5, T-9 (10)]

Storm water flow is directed via sheet flow, which infiltrates into the surrounding soil, or to the storm water drains located on the Site. The storm water was reported to eventually discharge to the municipal storm water system. In the event of a spill or release, facility drainage and containment equipment or absorbent materials will prevent oil from migrating off-site. Spills or releases can be contained and recovered on-site before flowing off-site to navigable waters. The nearest navigable water body is an unnamed pond located approximately 720 feet to the southeast of the site.

10.0 Non-Storm Water Discharge Management [ACT 5, T-3 (10)]

Alden accepts DAF float from USDA regulated food processing facilities. The DAF float is processed through a 3-phase solid liquid separation process. The used cooking oil phase is sold for renewable diesel, the solids are taken for landfill or composting, and the liquids are further treated. The liquid further treatment consists of a dissolved air floatation (DAF) unit and pH adjustment. The DAF unit is used to remove residual suspended solids. The pH is adjusted with sodium hydroxide to neutral or to meet discharge requirements. Solids generated during the treatment process are landfilled.

The Site sanitary wastewater is discharged into a sanitary sewer system maintained by the Town of Raleigh. Sanitary facilities are adequately maintained.

11.0 RECORDKEEPING AND TRAINING

11.1 Log of Changes to the SWPPP

Table 4: Initial Plan Certification and List of Revisions

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 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.			
Authorized Representative:			
Signature:		Date:	
List of Revisions			
Number	Date	Author	Signature of Authorized Representative
1			
2			
3			
4			

FIGURES

Reference: Aerial Photograph, EDR-Map data © 2022 Imagery © 2022, Maxar Technologies, USDA Farm Service Agency.

LEGEND

1. Residential
2. Warehouse
3. Vacant land
4. Agricultural

A. Gate
B. Pole-mounted transformer

Building 1 – Warehouse
Building 2 – open pavilion
Building 3 – used by Maxx South Broadband

Oil Tank

Perimeter Fence

Approximate Site Boundary

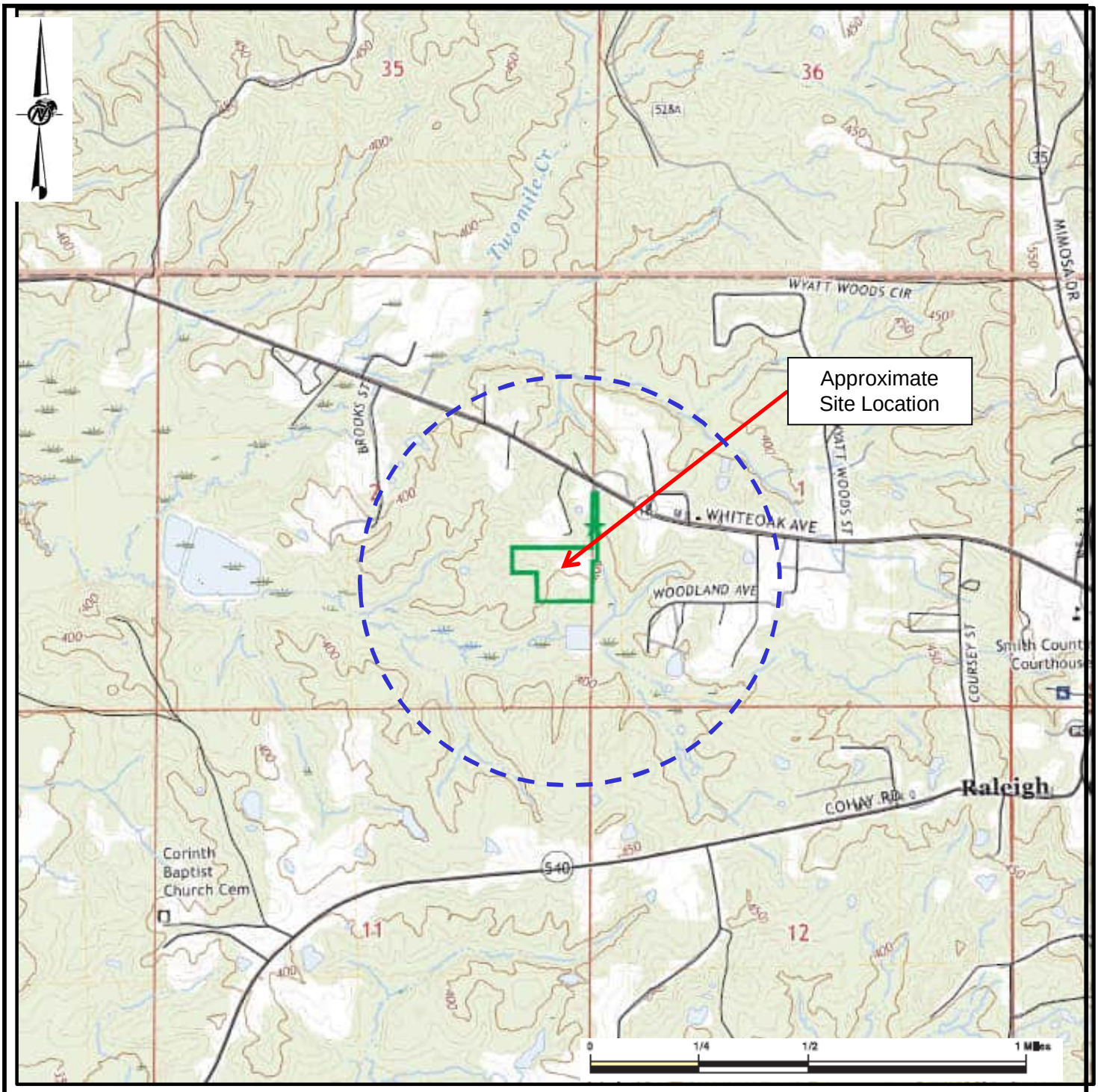
CLIENT/PROJECT

102 Industrial Park Rd
Raleigh, MS 39153

TITLE

SWPPP Location Map

DRAWN	CHECKED	REVIEWED	DATE	SCALE	JOB NO.	DWG NO.	SUBTITLE	REV. NO.	FIGURE
AMW	JR	AWD	01-26-2023	As Shown	31404045.001	NA	NA	NA	1



Reference: The EDR Radius Map™ Report with Geo Check®, 102 Industrial Park Rd102 Industrial Park Rd Raleigh, MS 39153, January 28, 2022, Map for 2020 Raleigh, MS.

CLIENT/PROJECT **102 Industrial Park Rd Raleigh, MS 39153**		USGS TOPOGRAPHIC MAP: RALEIGH MAP YEAR: 2020 SERIES: 7.5 SCALE: 1:24000
TITLE **USGS Topographic Map: Raleigh, MS Map**		

DRAWN	CHECKED	REVIEWED	DATE	SCALE	JOB NO.	FIGURE
TK	CH	AWD	11-07-23	As Shown	31405045.001	**2**

APPENDIX A

Mississippi State Operating Permit

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

FOR COVERAGE UNDER THE INDUSTRIAL STORMWATER GENERAL NPDES PERMIT MSR00 ___ _ _

(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: Bill Paul **Position:** Sr. Vice President

Owner Company Name: Alden Group Renewable Energy

Owner Street (P.O. Box): 9595 Six Pines Drive, Suite 6370

Owner City: The Woodlands **State:** TX **Zip:** 77380

Owner Phone Number: (832) 400-1239 **Owner Email:** bpaul@AldenGroup.com

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: Bill Paul **Position:** Sr. Vice President

Operator Company Name: Alden Group Renewable Energy

Operator Street (P.O. Box): 102 Industrial Park Rd, Raleigh, MS 39153

Operator City: Raleigh **State:** MS **Zip:** 39153

Operator Phone Number: (832)400-1239 **Operator Email:** bpaul@AldenGroup.com

FACILITY INFORMATION

Facility Name: Alden Group Renewable Energy

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

SIC Code: ___ ___ ___ ___ Other Nonhazardous Waste Treatment and Disposal NAICS Code 562219

Receiving Stream: Clear 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: 102 Industrial Park Road **City:** Raleigh

County: Smith **Zip:** 39153

Latitude: 32 degrees 2 minutes 18.2868 seconds **Longitude:** 89 degrees 32 minutes 34.0836 seconds

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

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):**

Note: Pretreatment Application in process to determine if necessary

How will sanitary sewage be collected and treated? Raleigh Municipal Wastewater

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

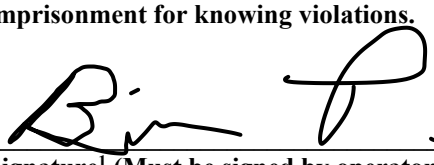
N/A

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)

11/13/2023

Date Signed

Bill Paul

Printed Name[1]

Sr VP Operations

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

APPENDIX B

Quarterly Storm Water Monitoring and Inspection Forms

ALDEN GROUP RENEWABLE ENERGY

RALEIGH, MISSISSIPPI FACIITY

PERIODIC INSPECTION LOG AND CHECKLIST

Completed By:_____ Date:_____

Monthly Inspection (A detailed visual inspection of the tanks, tank supports, drums, pipelines/hoses, valves, connections, and appurtenances must be performed monthly, including an inspection of the primary and interstice of double-wall tanks.)

This checklist to be completed at least monthly by staff familiar with oil storage system and kept on file in the facility for a minimum of three years.

Containers (tanks, totes, drums, roll-off boxes)

No corrosion/drip marks/leaks/damage	❑ Yes	❑ No
Shell/seams show no signs of leakage	❑ Yes	❑ No
Vents (if present) not obstructed	❑ Yes	❑ No
All containers labeled with contents; tanks labeled with capacity	❑ Yes	❑ No
Drainage valves closed; lids secured	❑ Yes	❑ No
Tank drainage valves locked	❑ Yes	❑ No
Tank level gauge(s) working	❑ Yes	❑ No

Observations/Corrective Action Required: _____

_____

_____

_____

Containment (dike and berm)

No cracks/deterioration/seepage	❑ Yes	❑ No
No puddles containing spilled/leaked material	❑ Yes	❑ No
No standing water	❑ Yes	❑ No
If water present, no visible sheen	❑ Yes	❑ No
Unloading plastic catch vessels intact; not leaking	❑ Yes	❑ No
Sufficient capacity is available in containment berm	❑ Yes	❑ No

Observations/Corrective Action Required: _____

_____

_____

_____

Piping/hosing/valves/fittings/pumps

No deterioration, leaks, seepage	❑ Yes	❑ No
No discoloration/stains/drip marks	❑ Yes	❑ No
No kinking/twisting	❑ Yes	❑ No
No pooling of oil	❑ Yes	❑ No
Adequate piping support (i.e. no sagging in pipe)	❑ Yes	❑ No

Observations/Corrective Action Required: _____

_____

_____

_____

ALDEN GROUP RENEWABLE ENERGY

RALEIGH, MISSISSIPPI FACIITY

PERIODIC INSPECTION LOG AND CHECKLIST

Completed By:_____ Date:_____

Driveways/general housekeeping

No significant oil “tracking”/no pools of oil	❑ Yes	❑ No
No significant staining	❑ Yes	❑ No
No standing water that is significantly contaminated (e.g. visible sheen)	❑ Yes	❑ No
Storage areas neat and orderly	❑ Yes	❑ No
General plant housekeeping sufficient	❑ Yes	❑ No

Observations/Corrective Action Required: _____

_____

_____

_____

Security

Facility lighting – no burnt out lamps	❑ Yes	❑ No
Facility doors – locks in place	❑ Yes	❑ No
Outside trailer – locks in place	❑ Yes	❑ No
Outside tank truck – drainage valve locked	❑ Yes	❑ No

Observations/Corrective Action Required: _____

_____

_____

_____

Spill Cleanup Materials/Spill Response Protocol

Supplies adequate and accessible	❑ Yes	❑ No
Protocol in place for responding to/reporting spills	❑ Yes	❑ No

Observations/Corrective Action Required: _____

_____

_____

_____

Training

Spill prevention briefings current (at least every year)	❑ Yes	❑ No
Training records on file	❑ Yes	❑ No

Observations/Corrective Action Required: _____

_____

_____

_____

REPORT ALL LEAKS TO BRANCH MANAGER AND TAKE APPROPRIATE ACTION IMMEDIATELY

Signature:_____ Date:_____

ALDEN GROUP RENEWABLE ENERGY

RALEIGH, MISSISSIPPI FACIITY

SPILL RESPONSE EQUIPMENT INVENTORY

(Inside or within close proximity to each Spill - Kit)

Location	Item	Quantity	Check
Storage Building	Socks		
Storage Building	Booms		
Storage Building	Absorbent pads		
Storage Building	Granular Absorbent		

APPENDIX C

Training Documentation

TRAINING DOCUMENTATION		

APPENDIX D

CERCLA Regualtions

ACT5 (ISGP) Stormwater Pollution Prevention Plan (SWPPP) Development and Content:

T-1 STORMWATER POLLUTION PREVENTION PLAN (SWPPP) DEVELOPMENT:

A SWPPP shall be developed and implemented for each facility subject to this permit. A SWPPP shall be prepared in accordance with sound engineering practices and shall identify potential sources of pollution, which may reasonably be expected to affect the quality of stormwater discharges associated with industrial activity from the facility. The SWPPP shall describe and ensure the implementation of best management practices which will reduce pollutants in stormwater discharges and assure compliance with the terms and conditions of this permit. For assistance in developing a SWPPP, applicants are encouraged to reference the Mississippi Stormwater Pollution Prevention Plan (SWPPP) Guidance Manual for Industrial Facilities or other recognized manual of design, such as EPA's "Developing Your Stormwater Pollution Prevention Plan" (February, 2009), which are available at: https://www.mdeq.ms.gov/industrial-stormwater/ [11 Miss. Admin. Code Pt. 6, Ch. 1.]

T-2 MINIMUM SWPPP COMPONENTS/DESCRIPTION OF POTENTIAL POLLUTANT SOURCES:

Each plan shall identify all activities and significant materials which may potentially pollute stormwater discharges, including:

(1) A list of industrial activities exposed to stormwater (e.g., storage; equipment fueling; maintenance and cleaning; loading/unloading; process areas, discharge location, etc.);

(2) A list of the materials and pollutants associated with each of the activities identified above (e.g., used oil, zinc, sulfuric acid, solvents, etc.);

(3) A narrative description of the materials and pollutants identified above. The narrative shall include, but not be limited to:

(A) Method of storage or disposal,

(B) Management practices employed to minimize contact of these materials with stormwater,

(C) Existing structural and non-structural control measures to reduce pollutants in stormwater runoff, and

(D) Any treatment the stormwater receives. [11 Miss. Admin. Code Pt. 6, Ch. 1.]

ACT5 (continued):

T-3 (4) 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, which can be found on the MDEQ website at https://www.mdeq.ms.gov/industrial-stormwater/. 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;

(5) An updated summary of all stormwater sampling data (if available), including a description of associated pollutants of concern (see ACT17, T-15 Definitions).

T-4 (6) The owner or operator shall prepare a detailed scaled site map showing the property layout with site boundaries and indicating the following features:

(A) Surface water bodies,

(B) Drainage area of each stormwater outfall identified by number,

(C) Direction of flow for each area (designated by arrow),

(D) Location and a description of existing structural and nonstructural control measures to reduce pollutants in stormwater runoff,

(E) Location of any stormwater treatment activities,

(F) Location of any storm drain inlets,

(G) Location of industrial activities, such as:
- (i) Fuel storage and dispensing locations,
- (ii) Vehicle/equipment repair, maintenance and cleaning areas,
- (iii) Materials storage and handing areas,
- (iv) Loading/unloading areas,
- (v) Process or manufacturing areas,

(H) Location of housekeeping practices,

ACT5 (continued):

(I) Stormwater conveyances (ditches, pipes, & swales), and

T-5 (J) Any post-construction control measures.

(7) A topographic map extending at least 1/2 mile beyond the facility property boundaries. This may be part of the above required site map; and

(8) A summary of the types of pollutants likely to be present for each area of the facility generating stormwater discharges with a reasonable potential for containing significant amounts of pollutants. [11 Miss. Admin. Code Pt. 6, Ch. 1.]

T-6 MINIMUM SWPPP COMPONENTS/DESCRIPTION OF STORMWATER MANAGEMENT CONTROLS:

The coverage recipient shall describe appropriate stormwater management controls addressing identified potential pollution sources and implement such controls. The description shall include a schedule for implementing the following minimum components:

(1) Pollution Prevention Manager/Committee. The SWPPP shall specify individual(s) responsible for developing the SWPPP and assisting the facility manager in its implementation, maintenance, and revision.

(2) Risk Identification and Assessment/Material Inventory. The SWPPP shall 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 waste disposal practices. Factors to consider include the toxicity and quantity of chemicals used, produced, or discharged, the likelihood of contact with stormwater and history of significant leaks or spills of toxic or hazardous pollutants. The plan shall include an inventory of materials handled. Based on the Risk Identification and Material Inventory, the plan shall specify management controls, and, if necessary, structural controls to reduce or eliminate the potential for pollutants in the stormwater discharges.

(3) Sediment and Erosion Prevention. The SWPPP shall identify areas with a high potential for soil erosion, and specify prevention measures to limit erosion (using grading, berming or curbing to prevent runoff of contaminated flows and divert run-on away from these areas; locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge; etc.).

(4) Preventive Maintenance. A preventive maintenance program shall require inspection and maintenance of stormwater management devices (cleaning oil/water separators, catch basins, etc.) and the inspecting and testing of equipment to preclude breakdowns or failures that may cause pollution.

ACT5 (continued):

T-7 (5) Good Housekeeping. The owner or operator shall describe and list practices appropriate to prevent pollutants from entering stormwater from industrial activities due to poor housekeeping. The owner or operator shall:

(A) Designate areas for equipment maintenance and repair;

(B) Provide waste receptacles at convenient locations (outdoor waste receptacles must be covered).

(C) Provide regular collection of waste;

(D) Provide protected storage areas for chemicals, paints, solvents, fertilizers, and other potentially toxic materials;

(E) Provide adequately maintained sanitary facilities;

(F) Provide secondary containment around any on-site single fuel or chemical container with a capacity greater than 660 gallons or any combination of containers which has an above ground bulk storage capacity of more than 1,320 gallons; and

(G) Provide secondary containment for raw material stockpiles (if required to prevent material from entering waters of the State).

(6) Spill Prevention and Response Procedures. The SWPPP shall clearly identify potential spill areas and their drainage points. The plan should specify material handling procedures and storage requirements. Procedures for cleaning up spills shall be identified and made available to the appropriate personnel. The necessary clean up equipment should be available to personnel.

(7) Employee Training. The SWPPP shall specify periodic training for personnel that are responsible for implementing and/or complying with the requirements of the SWPPP (see ACT14).

(8) Illicit Connections- Evaluation and Certification. The coverage recipient shall certify at least every five (5) years that stormwater discharges have been evaluated for the presence of non-allowable, non-stormwater 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. The certification shall be filed on-site with the SWPPP and made available to MDEQ personnel for inspection upon request.

This certification may not be feasible if the coverage recipient does not have access to the discharge before it enters the ultimate receiving conduit. In such cases, the SWPPP shall include why the certification required by this part was not feasible. [11 Miss. Admin. Code Pt. 6, Ch. 1.]

ACT5 (continued):

T-8 (9) Routine Visual Site Inspections. The purpose of conducting visual site inspections is to make sure stormwater discharges are free from objectionable characteristics in observable amounts (i.e., turbidity, color, sheen, etc.). The SWPPP shall describe the policy and procedures for routine visual site inspections, including frequencies and areas to be inspected. Areas to be inspected must include all industrial activities exposed to stormwater identified in ACT5, T-2 (1). These areas must be checked for evidence of pollutants entering the stormwater drainage system and also identify conditions which may give rise to contamination of stormwater runoff.

The frequency of inspections shall be performed as often as needed but no less than once monthly. If feasible, the inspections should be conducted during or after storm events. As part of the inspection, stormwater should be collected in a clean, clear jar and examined in a well-lit area. The SWPPP should outline procedures consistent with the requirements of ACT10, R-1 to investigate, correct and document instances in which visible pollutants are observed.

T-9 (10) Stormwater Management. The SWPPP should provide for the management of stormwater volume through its diversion, infiltration, storage or re-use.

(11) Non-Stormwater Discharge Management. The SWPPP must identify any allowable non-stormwater discharges, identified in ACT 2, T-3, except for flows from actual firefighting activities, which are combined with stormwater discharges associated with industrial activity at the site. Non-stormwater discharges should be eliminated or reduced to the extent feasible. The SWPPP must identify and ensure the implementation of appropriate Best Management Practices (BMPs) for the non-stormwater component of the discharge. [11 Miss. Admin. Code Pt. 6, Ch. 1.]

APPENDIX E

Current Years Discharge Monitoring Report

CURRENT YEARS DISCHARGE MONITORING REPORTS		

WSP.com