March 1, 2024

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

Re: ***Storm Water Major Modification & Storm Water Pollution Prevention Plan Update***
Marietta Dry Kiln, LLC
Fulton, Mississippi (Itawamba County)
Coverage No.: MSR002387

Dear Ms. Barefoot:

Marietta Dry Kiln, LLC retained the services of Environmental Compliance & Safety, Inc. (ECS) to prepare the Major Modification form and update the Storm Water Pollution Prevention Plan (SWPPP) for the above-referenced facility. The SWPPP was updated to include adjacent property (former Tombigbee Lumber site). Attached you will find the Major Modification form, and SWPPP that reflects the facility's current and planned operations and storm water best management practices.

If you have any questions or concerns regarding the enclosed request or updated plan, please feel free to contact me at (662) 840-5945 or Craig Pharr of Marietta Dry Kiln, LLC at (662) 728-9874.

Sincerely,

Summer Duncan

Summer Duncan
Environmental Services Manager

Attachment I: Major Modification Form
Attachment II: Storm Water Pollution Prevention Plan (SWPPP)

ATTACHMENT I

MAJOR MODIFICATION FORM

AI: 6219

Rec'd via hard copy: 03/14/2024

MAJOR MODIFICATION FORM
FOR INDUSTRIAL STORMWATER GENERAL PERMIT

Coverage No. MSR00 2387 **County** Itawamba

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

INSTRUCTIONS

Coverage recipients shall notify the Mississippi Department of Environmental Quality at least 30 days in advance of the following activities (check all that apply). This form should be submitted with a modified Storm Water Pollution Prevention Plan (SWPPP), updated USGS topographic map, Corps of Engineers Section 404 documentation and wastewater collection and treatment information, as appropriate.

- ☐ **Facility operations are proposed to change.**
- ■ **"Footprint" identified in the original ISNOI is proposed to be enlarged.**
- ☐ **Stormwater Quality BMPs are proposed to be modified.**

This form must be signed by the current coverage recipient under Mississippi's Industrial Stormwater General Permit, an attached SWPPP must be included, and documentation of the changes compared to the previous approved SWPPP are attached.

Coverage recipients are authorized to discharge storm water associated with proposed new operations, additional areas of activity, or modified BMPs, under the conditions of the General Permit, only upon receipt of written notification of approval by MDEQ. All other modifications must be in accordance with ACT9, S-1 (6) and S-2 (7) of the General Permit.

ALL INFORMATION MUST BE COMPLETED (indicate "N/A" where not applicable)

COVERAGE RECIPIENT INFORMATION

COVERAGE RECIPIENT CONTACT NAME: Craig Pharr TEL # (662) 728-9874

COMPANY NAME: Marietta Dry Kiln, LLC

STREET OR P.O. BOX: 401 Career Technical Drive

CITY: Fulton STATE: MS ZIP: 38843 E-MAIL: mws9874@aol.com

PROJECT INFORMATION

PROJECT NAME: Addition of Adjacent Property (Former Tombigbee Lumber)

CITY: Fulton, MS

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.

Craig Pharr
Signature (must be signed by coverage recipient)

3-8-24
Date

Craig Pharr
Printed Name

President
Title

Please submit this form to:

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

O.C

ATTACHMENT II

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

INDUSTRIAL STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

MARIETTA DRY KILN, LLC
401 Career Technical Drive
Fulton, Mississippi 38843

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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RECORD OF REVISIONS

Revision Date	Reason for Revision	Revised Pages, Tables, Figures, or Appendices	Person(s) Responsible for Revisions
12/29/2021	Updated SWPPP to comply with Mississippi Industrial Storm Water General Permit For Industrial Activities.	Entire document.	Jake Rucker, P.E (ECS) Summer Duncan (ECS) Caleb James (ECS)
3/1/2024	Updated SWPPP to include acquired adjacent property (former Tombigbee Lumber site).	Entire document.	Summer Duncan (ECS) Brian Ketchum, P.E. (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.

Craig Pharr
Signature

3.8.24
Date

Craig Pharr
Name (Printed)

President
Title

Marietta Dry Kiln, LLC
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.

Brian Ketchum
Brian Ketchum, P.E.
Principal, Senior Engineer
Environmental Compliance & Safety, Inc.

03/01/2024
Date

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.

Marietta Dry Kiln, LLC (MDK), located at 401 Career Technical Drive, Fulton, Mississippi, is classified under Standard Classification Code (SIC) 2426, Hardwood Dimension and Flooring Mills. 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).

MDK has prepared a SWPPP for operations at the Fulton, 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:	Marietta Dry Kiln, LLC				
Mailing and Physical Address:	401 Career Technical Drive, Fulton, Mississippi				
Location (GPS):	Latitude:	34° 16' 52" N	Longitude:	88° 25' 08" W	
SWPPP Contact:	Shelly Green, Office Manager				
Office: (662) 862-9494	**Cell:**	(662) 401-1390	**Email:**	sgreenmdk@gmail.com	
Storm Water Outfalls:					
SW001	**Latitude:**	34° 16' 48.7" N	**Longitude:**	88° 25' 04.7" W	
SW002	**Latitude:**	34° 16' 52.7" N	**Longitude:**	88° 25' 12.1" W	
SW003	**Latitude:**	34° 16' 50.34" N	**Longitude:**	88° 24' 55.78" W	
Closest Water Body and Route of Entry:	Cummings Creek and Tennessee-Tombigbee Waterway				
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

Marietta Dry Kiln, LLC (MDK) is located at 401 Career Technical Drive in Fulton, Mississippi. The entire site encompasses approximately 34 acres. Approximately 48 percent of the property is covered by impervious material (concrete, asphalt, compacted gravel, roofing), and the remaining 52 percent is covered with grass, natural vegetation, or gravel. Approximately 65,250 square feet of manufacturing operations are covered under roof. The facility operations fall primarily within Standard Industrial Classification (SIC) Code 2426, Hardwood Dimension and Flooring Mills. The adjacent properties are used for industrial and educational 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

MDK operates a lumber drying and planing facility adjacent to the Tennessee-Tombigbee Waterway and Cummings Creek. Operations include lumber storage, five (5) kilns, and a planer operation. Green dimensional lumber is received via truck. The lumber is dipped into an anti-sap stain, then stacked in sheds to dry. Lumber is then dried, stacked, packaged, and shipped. In some instances, lumber may bypass the kiln and be planed and/or ripped, according to customer requested specifications, prior to packaging and shipping.

3.3 Site Security

Primary access to the site is limited to two (2) entrances located on Career Technical Drive. Locked gates are used at the site on the east and west sides of the building. Visitors to the facility must check in with the front office. When not operating, the gates and building are locked. To assist further in security measures, the facility is adequately lit with security lighting.

3.4 Site Drainage and Storm Water Outfalls

The site is partially located within the 100-year flood zone due to close proximity to Cummings Creek and the Tennessee-Tombigbee Waterway. The site is designed and graded to route storm water via sheet flow to Cummings Creek to the south. A small portion of the site is graded such that storm water sheet flows into Career Technical Drive's roadside ditch which flows north directly into the Tennessee-Tombigbee Waterway. Storm water runoff exits the site at three (3) 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	*Scrap Wood Containers/Piles, Uncovered Wood Storage Areas, Covered Wood Storage Areas, Truck Loadout, Diesel Tank and Other Oil-Filled Tanks, Empty Diesel Tank, Kilns, Dip Tank and Dip Tank Chemicals, Loaders and Other Motorized Equipment, Solid Waste Containers, Scrap Metal Container/Piles, Equipment Laydown, Transformers, and End Wax Operations.* Storm water that falls on the South and central portion of the property.	Sheet flow to drainage ditches and culverts to an unnamed drainage ditch, which flows south into Cummings Creek.	Unnamed drainage ditch to Cummings Creek
SW002	*Scrap Wood Containers/Piles, Uncovered Wood Storage Areas, Diesel Tank and Other Oil-Filled Tanks, Loaders and Other Motorized Equipment, Vehicles in Employee and Visitor Parking, Loading Dock, and End Wax Operations.* Storm water that falls on the northwest portion of the property.	Sheet flow to a drainage ditch that flows east to an unnamed tributary, which flows north to Tennessee-Tombigbee Waterway.	Unnamed drainage ditch to Tennessee-Tombigbee Waterway
SW003	*Scrap Wood Containers/Piles, Uncovered Wood Storage Areas, Covered Wood Storage Areas, Scrap Metal Container/Piles, Equipment Laydown, Saw Dust Pile, and Gravel Pile.* Storm water that falls on the South and central portion of the property.	Sheet flow to drainage ditch which flows south into Cummings Creek.	Unnamed drainage ditch to Cummings 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		
Shelly Green	Office 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.
SWPP Team Members		
Craig Pharr	President	❑ Signatory Responsibilities for the SWPPP. ❑ Overall responsibility for the Storm Water Program. ❑ Participates in the annual review to assess SWPPP effectiveness.
Lisa Pharr	Vice President	❑ Coordinates SWPPP development and implementation. ❑ Ensures annual SWPPP training is conducted. ❑ 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	Scrap Wood Container/Piles	Total Suspended Solids (TSS)	Routine inspections are conducted for excessive accumulation of organic material present from operations.	SW001 SW002 SW003
2	Uncovered Wood Storage Area	TSS	Routine inspections are conducted for excessive accumulation of organic material present from operations.	SW001 SW002 SW003
3	Covered Wood Storage Area	TSS	Routine inspections are conducted for excessive accumulation of organic material present from operations.	SW001 SW003
4	Truck Loadout	TSS	Routine inspections are conducted for excessive accumulation of organic material present from operations. Materials or spills will be immediately cleaned to prevent exposure to storm water.	SW001
5	Diesel Tank & Other Oil-Filled Tanks	Diesel	Secondary containment is provided. Locked drain valve for containment; regular inspections of area to check for releases. Materials or spills will be immediately cleaned to prevent exposure to storm water.	SW001 SW002
6	Empty Diesel Tank	Diesel	Routine inspections are conducted to ensure that the container integrity is adequate. Materials or spills will be immediately cleaned to prevent exposure to storm water.	SW001
7	Kilns	TSS	Routine inspections are conducted for excessive accumulation of organic material present from operations.	SW001
8	Dip Tank and Dip Tank Chemicals	Various Chemicals	Routine inspections are conducted to ensure that the container integrity as well as the secondary containment integrity are adequate. Materials or spills will be immediately cleaned to prevent exposure to storm water.	SW001

ID No.	Exposed Material	Potential Pollutant(s)	BMPs Implemented [1]	Outfall(s)
9	Loaders and Other Motorized Equipment	Fuel, Oil, and Grease	Equipment is maintained in good condition and routinely serviced in a covered/indoor location. Incidental leaks or spills will be cleaned immediately with absorbents.	SW001 SW002
10	Solid Waste Containers	Biochemical Oxygen Demand (BOD), TSS, Grease	The solid waste container is kept covered when not in use to minimize stormwater exposure. Materials or spills will be immediately cleaned to prevent exposure to storm water. The solid waste container is routinely emptied to avoid overfilling.	SW001
11	Scrap Metal Container/Piles	Metal, Oil and Grease	Routine inspections are conducted for any scrap metal accumulated with oils and grease. The dumpster is routinely emptied to avoid overfilling or prolonged exposure.	SW001 SW003
12	Vehicles in Employee and Visitor Parking	Anti-freeze, Fuel, Grease, Oil	Routine inspections are conducted for any spills or leaks. Spills or leaks will be immediately cleaned to prevent possible exposure to storm water.	SW002
13	Loading Dock	Anti-freeze, Fuel, Grease, Oil (from trucks)	Routine inspections are conducted for any spills or leaks. Loading docks have an overhang to provide partial cover to trailers. Spills will be immediately cleaned to prevent possible exposure to storm water.	SW002
14	Equipment Laydown	Oil and Grease	Routine inspections are conducted for any spills or leaks. Equipment is drained of any liquids and/or accumulated materials (e.g., grease) prior to storage.	SW001 SW003
15	Transformers	Oil	Routine inspections are conducted for any materials or spills. Materials or spills will be immediately cleaned to prevent exposure to storm water and leaking transformers will be immediately repaired or replaced.	SW001
16	End Wax Operations	Various Chemicals, TSS	Routine inspections are conducted for excessive accumulation of organic material present from operation. Materials or spills will be immediately cleaned to prevent exposure to storm water.	SW001 SW002
17	Saw Dust Pile	TSS	Routine inspections are conducted for excessive accumulation of organic material present from this area.	SW003
18	Gravel Pile	TSS	Routine inspections are conducted for excessive accumulation of material present from this area.	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:

- Roofing over process, shipping, and material storage areas prevent contact with storm water;
- Drainage ditches and culverts are maintained to provide adequate storm water flow to prevent erosion or ponding on site;
- Vegetated areas of the site are maintained to prevent erosion;
- The site is excavated, graded, and contoured in a way to minimize erosion from storm water and direct storm water to the designated outfalls;
- Impervious areas have been minimized to help reduce runoff and improve water quality of storm water leaving the site;
- Routine monthly site inspections per the requirements of the Industrial Storm Water General Permit, as well as the annual evaluations, are conducted to evaluate exposed materials and the effectiveness of the management practices;
- For containers, equipment, and transfer areas containing oil, the facility has provided containment, cover, keeps drainage valve locked when not in use, and conducts routine inspections for bulk storage containers.
- Drums and containers of chemicals are properly labeled, kept closed, and under cover when not in use;
- Site vehicles and equipment are routinely inspected for any fluid leaks as part of the facility's preventive maintenance program;
- Equipment maintenance is conducted indoors or under cover when feasible and equipment is not washed down using chemicals or detergents outdoors;
- 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.

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. Areas where condensation is discharged from air conditioners or air compressors are routinely inspected for evidence of contamination.

- **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 loadout area will be routinely inspected and cleaned of any associated debris or incidental releases. Waste will be disposed of regularly and transported to an approved landfill.

- **Outdoor Material Storage**

  Outdoor storage areas are routinely inspected to ensure that stored materials are in their designated areas and are free of accumulated sediment, debris, and any spills/leaks of fluid. 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, with waste disposed 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 dust collectors and inspections of oil-containing equipment (such as loaders and 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. Containers are plainly labeled to aid in proper handling and response and secondary containment is used when feasible. Based on current facility processes and the types and quantities of chemicals stored, there is not the potential for a significant spill or release; 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, SW002, and SW003) 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 have been 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. Sediment and erosion controls shall be maintained, as necessary. Accumulated sediment in a control structure shall be removed when it reaches one-half (1/2) the height of the control and properly disposed or repositioned. Nonfunctioning controls shall be repaired, replaced, or supplemented with functional controls within 24 hours of discovery or as soon as field conditions allow. Temporary controls will be removed when permanent controls have been established and are properly functioning.

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.

Numeric Limitations are not specified in the Industrial Storm Water General Permit. Also, there are no specific Federal effluent limitations guidelines applicable to storm water discharges at the site.

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) of an appreciable amount stored at the site. Small quantities of WPC may be contained in various materials located throughout the facility (i.e., dip tank chemicals, diesel fuel, etc.). The Safety Data Sheets (SDS) of all materials are maintained onsite.

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

313 Chemical	Product Type	Storage Container	Area stored	Quantity
Naphthalene	Liquid	Storage Tank and Plastic Tote	Stored in Diesel Tank with containment and cover and near Dip Tank.	500 gal 270 gal
Ethylbenzene	Liquid	Storage Tank	Stored in Diesel Tank with containment and cover.	500 gal
Diethylene Glycol Monomethyl Ether	Liquid	Plastic Tote	Stored near Dip Tank.	270 gal
Ethylene Glycol	Liquid	Plastic Tote	Stored near Uncovered Wood Storage Area.	270 gal

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 shall 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, pressure vessels, process and material handling equipment, and material bulk storage area shall 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.

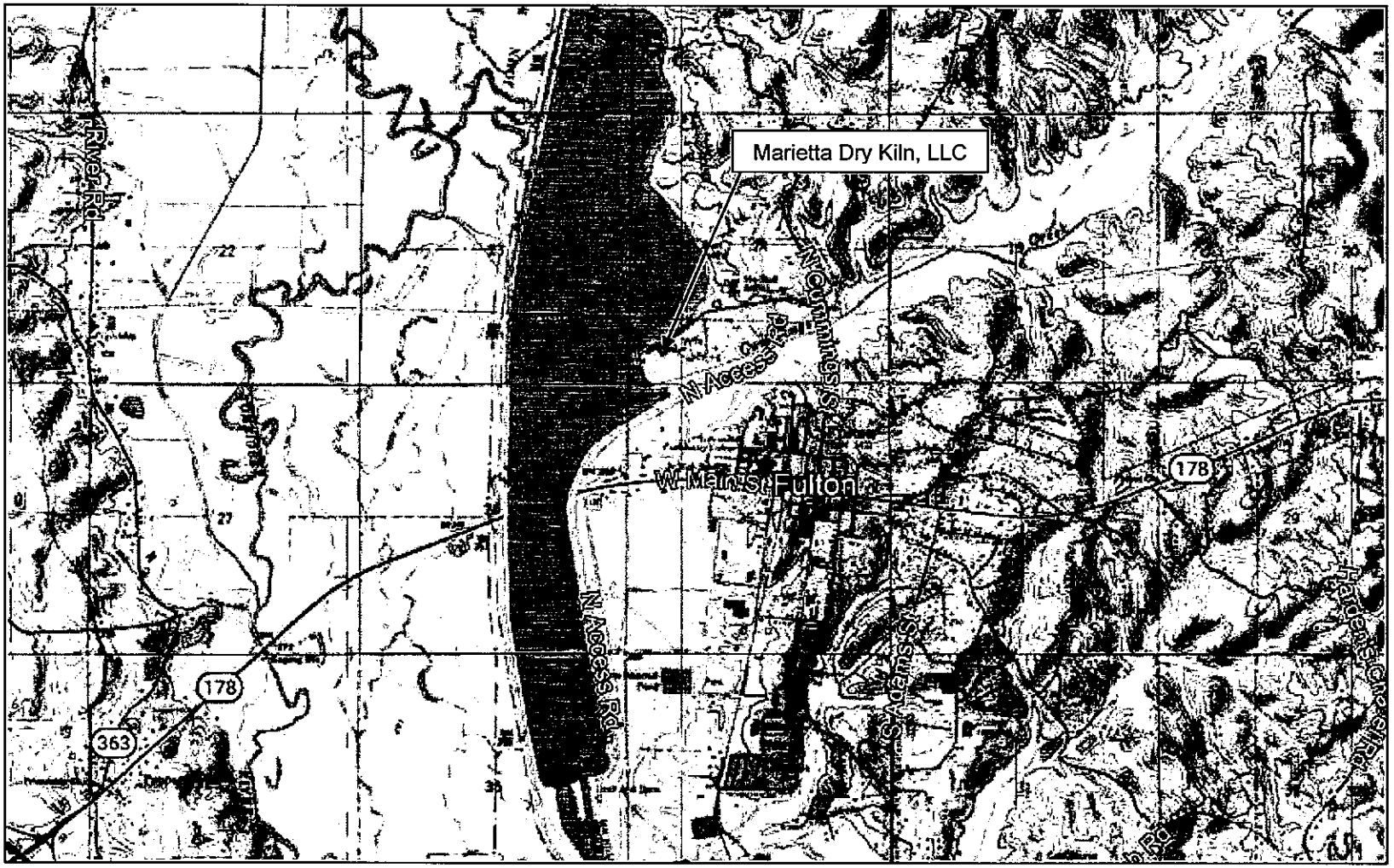
Reporting of Monitoring Results

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

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Source:
Google Earth
Topographic Map
(May 2022)

Legend:
N/A

Drawn By/Checked By: SDD/BSK

Date: 01/12/2024

Marietta Dry Kiln, LLC
401 Career Technical Drive
Fulton, Mississippi

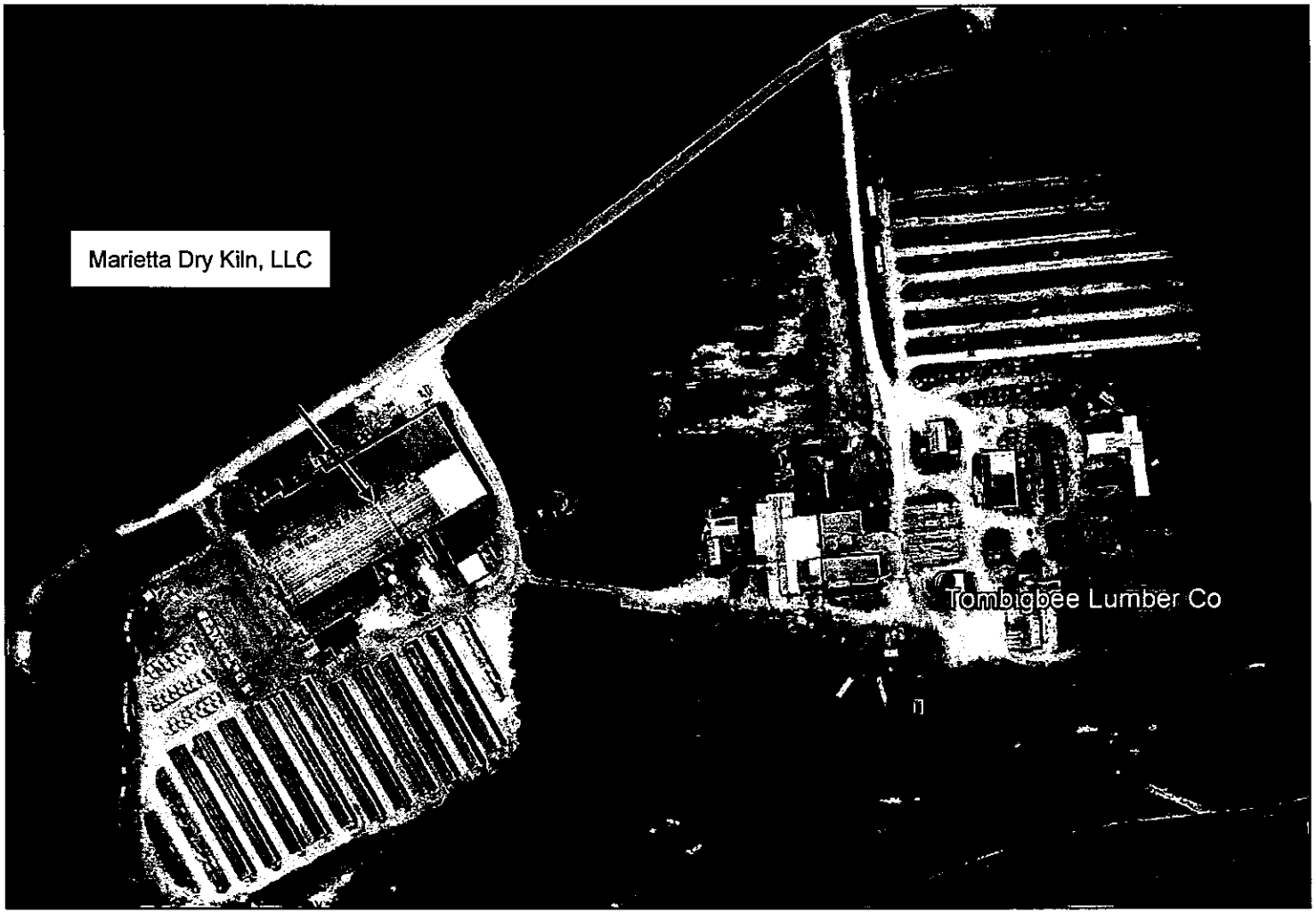
Figure 1: Site Location Map

ENVIRONMENTAL COMPLIANCE & SAFETY
ECS

P.O. Box 356
Sherman, MS
38869
(662) 840-5945

FIGURE 2

AERIAL MAP



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Source:
Google Earth (Imagery Date: 05/2022)

Legend:
N/A

Drawn By/Checked By: SDD/BSK	Date: 1/12/2024

Marietta Dry Kiln, LLC
401 Career Technical Drive
Fulton, Mississippi

Figure 2: Aerial Map

ENVIRONMENTAL COMPLIANCE & SAFETY
ECS

P.O. Box 356
Sherman, MS
38869
(662) 840-5945

FIGURE 3

STORM WATER FLOW DIAGRAM

ID No.	Exposed Material
1	Scrap Wood Container/Piles
2	Uncovered Wood Storage Area
3	Covered Wood Storage Area
4	Truck Loadout
5	Diesel Tank & Other Oil-Filled Tanks
6	Empty Diesel Tank
7	Kilns
8	Dip Tank and Dip Tank Chemicals
9	Loaders and Other Motorized Equipment

Enviromental Compliance
& Safety, Inc.
P.O. Box 356
Sherman, MS 38869
(662) 840-5945

n Pipes
r Flow
Outfall(s)

Exposed Materials ①
Property Boundary

Drawn By: SDD
Date: 3/1/2024

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	1/5/2024	Visual Inspection	N/A	No	N/A	Thomas Gann (MDK) Summer Duncan (ECS)
SW002	1/5/2024	Visual Inspection	N/A	No	N/A	Thomas Gann (MDK) Summer Duncan (ECS)
SW003	1/5/2024	Visual Inspection	N/A	No	N/A	Thomas Gann (MDK) Summer Duncan (ECS)

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.
Craig Pharr, President	(662) 728-9874
C. Signature Craig Pharr	**D. Date Signed** 3.8.24

[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