

2020

BASELINE NOTICE OF INTENT (BNODEQ

FOR COVERAGE UNDER THE BASELINE STORM WATER GENERAL NPDES PERMIT MSR00 2 4 0 4

(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 BNOI must include a Storm Water Pollution Prevention Plan (SWPPP) with the minimum components found in ACTs 5 and 6 of the Baseline Storm Water 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: X OWNER OPERATOR (PLEASE CHECK ONE OR BOTH)

OWNER INFORMATION

Owner Contact Name: Kevin Jobe	Position:	Regional Environmental Manager
Owner Company Name: Drax Biomass, Inc.		
Owner Street (P.O. Box): 1500 North 19th Street, Suite 501		
Owner City: Monroe	State:	Zip: 71201
Owner Phone Number: (318) 376-8314 Owner Email: key	vin.jobe@draxbion	nass.com

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: Daniel Watt	Position: Plant Manager			
Operator Company Name: Amite BioEnergy, LLC / Drax Biomass, Inc.				
Operator Street (P.O. Box): 1763 Georgia Pacific Road #2				
Operator City: Gloster State: MS	Zip:39638			
Operator Phone Number: (318) 351-0127 Operator Email: daniel.w	att@draxbiomass.com			

FACILITY INFORMATION

Facility Name:Amite BioEnergy, LLC			
Nature of Business (Include 4-digit Standard Industrial Classification Code (SIC) and description): SIC Code: 2 4 9 9 Wood Products, Not Elsewhere Classified			
Receiving Stream: Little Beaver 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: 1763 Georgia Pacific Road #2 City: Gloster			
County: Amite Zip: 39638			
Latitude: <u>31</u> degrees <u>11</u> minutes <u>7</u> seconds Longitude: <u>-91</u> degrees <u>2</u> minutes <u>3</u> seconds			
Method Used to Determine Lat & Long (GPS of plant entrance) or Map Interpolation):			
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

This is a re-coverage form Is this notice for a facility that will require other permits? X Yes INo			
If yes, check which one(s): 🛛 Air, 🗌 Hazardous Waste, 🗌 Pretreatment, 🗌 Water State Operating, 🗌 Individual NPDES, or list Other(s):			
Existing Construction Air Permit: 0080-00031			
How will sanitary sewage be collected and treated? City sewer Note: this is a re-coverage form			
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? XYes No			
If yes, please describe: Natural sedimentation and biodegradation by retention ponds			
associated with each outfall (3 ponds, 3 outfalls)			

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.

h Wats

Signature¹ (Must be signed by operator when different than owner)

Daniel G. Watt

Printed Name

¹This application shall be signed according to the General Permit, ACT 14, 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

O4/27/20 Date Signed

Plant Manager



STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

AMITE BIOENERGY, LLC WOOD PELLET MANUFACTURING FACILITY 1763 GEORGIA PACIFIC ROAD #2 GLOSTER, MISSISSIPPI AMITE COUNTY

PPM PROJECT NO. 30065102

APRIL 2020



STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

FOR

AMITE BIOENERGY, LLC WOOD PELLET MANUFACTURING FACILITY 1763 GEORGIA PACIFIC ROAD #2 GLOSTER, MISSISSIPPI AMITE COUNTY

PREPARED FOR:

DRAX BIOMASS, INC. 1500 NORTH 19[™] STREET SUITE 501 MONROE, LOUISIANA 71201

PPM PROJECT NO. 30065102

PREPARED BY:

PPM CONSULTANTS, INC. 289 COMMERCE PARK DRIVE SUITE E RIDGELAND, MISSISSIPPI 39157

APRIL 2020

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Form 2 – Monthly Inspection Report Form

Form 3 – Monthly Visual Jar Test Inspection Form

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MISSISSIPPI'S BASELINE STORM WATER GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT CROSS-REFERENCE

Condition No.	Plan Section		
ACT5			
T-1	This Plan – Developed in accordance with MDEQ Baseline Storm Water General Permit requirements		
T-2 (1-2)	3.3 Summary of Potential Pollutant Sources3.5 Risk Identification		
T-2 (3)	3.3 Summary of Potential Pollutant Sources4.7 Management of Storm Water Runoff		
T-3 (4-5)	3.6Significant Spills and LeaksAppendix C – Worksheets		
T-4	Appendix B – Figures, Figure 2 – Site Map		
T-5 (7)	Appendix B – Figures, Figure 1 – Site Location Map		
T-5 (8)	3.3 Summary of Potential Pollutant Sources4.8 Sampling and Analysis of Storm Water Discharges		
T-6 (1)	2.0 Storm Water Pollution Prevention Team		
T-6 (2)	3.5 Risk Identification4.0 Best Management Practices and Controls (Entire Section)		
T-6 (3)	4.1 Sediment and Erosion Control		
T-6 (4)	4.4 Preventive Maintenance		
T-7 (5)	4.2 Good Housekeeping		
T-7 (6)	4.3 Spill Prevention and Response Procedures		
T-7 (7)	4.6 Employee Training and Communication Appendix F – Employee Training Logs		
T-7 (8)	 3.4 Non-Storm Water Discharges 7.0 Authorized Representative Certification Appendix C – Worksheets 		
T-8, T-9	 5.2 Weekly Visual Site Inspections 5.3 Monthly Routine Site Inspections Appendix D – Facility Inspection Forms (Monthly) 		

MISSISSIPPI'S BASELINE STORM WATER GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT CROSS-REFERENCE

Condition No.	Plan Section		
АСТ6			
T-1, T-2	Not applicable.		
ACT7			
S1 (1-2)	1.1 Purpose and Scope		
S-1 (3-6)	6.1.2 SWPPP Modifications		
S-2	1.1 Purpose and Scope		
ACT8			
	5.2 Weekly Visual Site Inspections		
S-1	5.3 Monthly Routine Site Inspections		
	Appendix D – Facility Inspection Forms (Monthly)		
	5.4 Annual Site Evaluation		
S-2	6.3 Annual Comprehensive Evaluation		
	Appendix E – Annual Comprehensive SWPPP Evaluation Report		
ACT12			
S183	4.6 Employee Training and Communication		
S-1 & 2	Appendix F – Employee Training Logs		



1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

The Amite BioEnergy, LLC (Amite) Wood Pellet Manufacturing Facility requires coverage under the National Pollution Discharge Elimination System (NPDES) through the State of Mississippi's Baseline Storm Water General NPDES Permit. The Mississippi Department of Environmental Quality (MDEQ) has issued a permit to discharge storm water from the facility under Baseline Storm Water General NPDES Permit Coverage No. MSR002404. A copy of the current permit is included in **Appendix A**.

This Storm Water Pollution Prevention Plan (SWPPP) has been prepared in general accordance with the requirements of Mississippi's SWPPP Guidance Manual, the Baseline Storm Water General Permit for Industrial Activities, and the facility's NPDES Discharge Permit

The plan identifies potential sources of pollution that may reasonably be expected to affect the quality of storm water discharges from the facility. The plan also describes and ensures implementation of practices that will be used to reduce pollutants in storm water discharges from the facility and facilitate compliance with the requirements of the permit.

A copy of this SWPPP must be maintained on-site and made available to Federal, State, and local agencies for review at the time of an on-site inspection or upon request. The plan will be available upon request to the Agency and upon written request to the general public.

Should the Agency review the SWPPP and recommend modifications, the facility shall make the required changes to the SWPPP and submit to the Agency within thirty (30) calendar days of receipt of such notification. A written certification that the requested changes have been made will accompany the plan.

The SWPPP will be amended whenever there is a change in design, construction, operation, or maintenance at the facility which has a significant effect on the discharge, or potential for discharge of pollutants from the facility. During inspections or investigations where it is determined that SWPPP is ineffective in eliminating or significantly minimizing pollutants from on-site sources, or is otherwise not achieving the general objectives of controlling pollutants in discharges from the facility. Amite will revise control measures accordingly



The SWPPP is consistent (and updated as necessary to remain consistent) with applicable State and/or local storm water regulations to the extent these apply to the facility. The Plant Manager will have the responsibility for revising the plan so that it reflects current conditions at the facility, and for documenting these revisions to reflect the facility's efforts to control pollution from storm water runoff.

The SWPPP will be retained at the facility until a date three years after the last modification or amendment is made to the plan, and at least three years following termination. Records of all monitoring information will be retained for at least three years from the date of measurement, report, or application.

1.2 SITE LOCATION AND PROPERTY DESCRIPTION

The Amite Wood Pellet Manufacturing facility is located at 1763 Georgia Pacific Road #2 in Gloster, Amite County, Mississippi at approximately 31.185306 North Latitude, 91.034300 West Longitude. The site location is shown in **Figure 1**, **Site Location Map** located in **Appendix B**. The facility's topography is relatively flat with an elevation of approximately 400 feet above mean sea level (MSL) and a slight slope to the west, south, and southwest according to the National Geodetic Vertical Datum (NGVD).

1.3 DESCRIPTION OF FACILITY OPERATIONS

The Amite facility manufactures wood pellets under the Standard Industrial Classification (SIC) Code 2499. Operations can be divided into five areas: initial log processing area, drying area, hammermill areas, pelletizers, and pellet coolers area, and pellet screen and loadout area.

The facility currently is permitted with three storm water outfalls (Outfalls 001 through 003). Outfall 001 is located at the southwestern corner of the facility and receives storm water from a nearby supply/storage yard. Outfall 002 is located at the southeastern corner of the facility and receives water from the process areas. Outfall 003 is located at the northeastern corner of the facility and receives water from the nearby fire water pump and the office parking area. Site features, including storm water outfall locations, are included in **Figure 2, Site Map** located in **Appendix B**.

Sources of storm water pollution at the facility include (but are not limited to) storage of wood debris/dust, lubricant/oil storage, diesel fuel storage, on-site transformers, and caustic storage. The facility maintains a Spill Prevention, Control, and Countermeasures (SPCC), and facility personnel will respond to spills and emergencies in accordance with the SPCC Plan.



2.0 STORM WATER POLLUTION PREVENTION TEAM

The following staff has been identified by Amite to comprise the facility's SWPPP team.

Team Member	Title	Telephone Number
Jamaria Warren	Safety Manager	781-530-6755 (Mobile)
Daniel Watt	Plant Manager	318-351-0127 (Mobile)

The members of the SWPPP team are delegated specific storm water management tasks for the development, implementation, and revision of the SWPPP. Members of the SWPPP team are assigned the following tasks:

- Entire Team
 - SWPPP Development
 - SWPPP Implementation
 - SWPPP Training
 - Identification of Potential Pollutant Source
 - Best Management Practice (BMP) Selection
- Plant Manager
 - Communication of Non-Compliance and Corrective Measure Implementation
 - Final Approval of Annual Comprehensive SWPPP Inspection Report
 - Signatory Authority
- Safety Manager
 - SWPPP Revisions
 - Spill Response and Documentation
 - Inspections and Annual Evaluations
 - Record Maintenance
 - Preventive Maintenance
 - New Equipment and/or Equipment Maintenance
 - Good Housekeeping



3.0 DESCRIPTION OF FACILITY AND POTENTIAL POLLUTANT SOURCES

3.1 DESCRIPTION OF FACILITY STORM WATER FLOWS

The facility discharges storm water through three outfalls. A description of each outfall and sources of discharge water for the outfall is presented below.

<u>Outfall 001</u>

Outfall 001 is located at the southwestern corner of the facility. Storm water discharging to Outfall 001 originates from a storage yard area (on the western portion of the site), where wood debris/dust piles, fuel/oil tanks, and empty drums/containers are stored. Storm water discharge from the storage yard either sheet flows or flows through designated pipes/culverts into the pond associated with Outfall 001. Accumulated storm water in the pond then discharges westward through Outfall 001 into an unnamed tributary of Little Beaver Creek.

<u>Outfall 002</u>

Outfall 002 is located at the southeastern corner of the facility. Storm water discharging to Outfall 002 originates from the process areas, which are bowled-in by natural and constructed earthen berms, of the facility. Process areas include drying, hammermilling, pelletizing, cooling, screening, and loadout processes. Storm water from the process areas flows through a series of drains, culverts, and underground piping to the pond associated with Outfall 002. Accumulated storm water in the pond then discharges southward through Outfall 002 into an unnamed tributary of Little Beaver Creek.

<u>Outfall 003</u>

Outfall 003 is located at the northeastern corner of the facility. Storm water discharging to Outfall 003 originates from the fire water pump area and the office parking lot (both located on the northern portion of the facility). Storm water from these areas flows through a series of culverts and underground piping to a smallholding pond, which is connected to an on-site drainage ditch. Outfall 003 is located where the drainage ditch and the facility fence line intersect.

Figure 2, Site Map, depicts storm water conveyances and features at the site, the direction of storm water flow to the outfalls; discharge structures, and structural control measures designed to reduce pollutants in storm water.



3.2 DESCRIPTION OF RECEIVING WATERS

Stormwater discharges into Little Beaver Creek which is not on the Mississippi 2018 Section 303(d) List of Impaired Waterbodies and does not have a set Total Maximum Daily Load (TMDL) for a pollutant of concern.

3.3 SUMMARY OF POTENTIAL POLLUTANT SOURCES

The storm water runoff drainage areas described in Section 3.1 were inspected to identify exposed significant materials within the drainage areas, which have the potential to contribute pollutants to the storm water runoff. The term "significant materials" includes, but is not limited to: raw materials, fuels, solvents, finished products, hazardous substances, chemicals the facility is required to report pursuant to Section 313 of Title III of Superfund Amendments and Reauthorization Act (SARA), and waste products that have the potential to be released with storm water runoff.

An inventory of exposed significant materials, potential pollutant sources, specific pollutant parameters of concern (where applicable) that can reasonably be associated with each source, existing materials management practices, and structural controls designed to prevent or minimize storm water contamination is included below.

Exposed Material / Potential Pollutant Source	Pollutant of Concern	Management Practices / Controls
Log Piles	Wood debris/dust	Retention pond, monthly inspections,
Chip Piles	Wood debris/dust	and monthly jar testing of Outfall 001
Bark Piles	Wood debris/dust	
Wet Side Mechanical Conveyors	Wood debris/dust	Retention pond, monthly inspections, and monthly jar testing of Outfall 002
Dryer, Cyclones, Wet Electrostatic Precipitator (WESP), and Regenerative Thermal Oxidizer (RTO)	Wood debris/dust	
Dry Side Mechanical Conveyors	Wood debris/dust	
1 st Stage Hammermills and Dust Collection	Wood debris/dust	-
2 nd Stage Hammermills and Dust Collection	Wood debris/dust	
Pelletizing	Wood debris/dust	
Pelletizing Dust Collection	Wood debris/dust]
Pellet Silos and Loadout	Wood debris/dust	1



Exposed Material / Potential Pollutant Source	Pollutant of Concern	Management Practices / Controls
Chemical Storage Building	Lubricants/oils	Oil-containing drums are situated inside the building, which has curbed, concrete secondary containment. Vertically-oriented drums are situated on a spill pallet. Retention pond, monthly inspections, and monthly jar tests of Outfall 002
Fire Pump Building with 300-gallon Diesel Storage Tank	Diesel	Double-walled AST located in weather-tight enclosure to prevent storm water exposure. Fill port is securely capped and tank is located inside a covered concrete building.
Ten 480-Volt Transformers (425 gallons each)	Transformer oil	Retention pond, monthly inspections, and monthly jar tests of Outfall 002
10,000-gallon Diesel	Diesel	Double-walled AST with securely
Storage Tank and Fuel Station		capped fill port. Retention pond, monthly inspections, and monthly jar
500-gallon Diesel Mobile Tank	Diesel	tests of Outfall 002.
Caustic (Sodium Hydroxide) Storage Tank	Sodium hydroxide	Secondary containment, retention pond, monthly inspections, and monthly jar tests of Outfall 002
Hazardous Waste	Hazardous waste	If present, stored inside chemical storage building, which has curbed concrete secondary containment. Retention pond, monthly inspections, and monthly jar tests of Outfall 002.
Generator Base Tank	Diesel	Double-walled AST with a securely capped fill port. Retention pond, monthly inspections, and monthly jar tests of Outfall 002.
One 4160-Volt Transformer	Transformer oil	Retention pond, monthly inspections, and monthly jar tests of Outfall 002

3.4 NON-STORM WATER DISCHARGES

A non-stormwater discharge includes any process or domestic wastewater. Connection of a non-stormwater discharge to the stormwater collection or outfall requires an Individual NPDES permit since the discharge may pose a significant deterioration of water quality.



However, specific non-stormwater discharges that do not require an Individual NPDES Permit have been approved by the Environmental Protection Agency (EPA) and include the following:

- Discharges from firefighting activities and fire hydrant flushings;
- Potable water sources including water line flushings;
- Uncontaminated air conditioning or compressor condensate;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with manufacturer's instructions;
- Water from the routine washing of pavement conducted without the use of detergents and where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed);
- Water from the routine external washing of buildings conducted without the use of detergents;
- Springs and other non-contaminated groundwater; and,
- Water from foundation or footing drains where flows are not contaminated with process materials such as solvents.

As required by Amite's General Permit, storm water will be evaluated for the presence of nonallowable, non-stormwater discharges every five years. The certification will include methods of evaluation, dates, observation points, and results. The certification will be filed on-site with the SWPPP and made available to MDEQ personnel for inspection upon request. An assessment of potentially unidentified non-storm water discharges at the facility is included as a worksheet in **Appendix C**.

3.5 **RISK IDENTIFICATION**

Liquid-filled storage tanks/containers/equipment and wood/chip/dust piles are the most likely pollutant sources at the facility that pose a risk of contaminating storm water discharges to Little Beaver Creek. The liquid stored in these tanks/containers/equipment includes diesel, oil, and caustic. Loading/unloading activities consist of transferring the same aforementioned materials.

The information contained in **Section 3.3** of this SWPPP documents Amite's assessment of the potential pollutants and pollutant sources within each storm water drainage area of the facility.



3.6 SIGNIFICANT SPILLS AND LEAKS

The EPA has defined "significant spills" to include hazardous substances released within a 24hour period in excess of reportable quantities under Section 311 of the Clean Water Act and Section 102 of the CERCLA. Reportable quantities are set amounts of substances in pounds, gallons, or other units and are listed in 40 CFR Part 117 and 40 CFR Part 302. Releases are defined to include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment.

Documenting spills and leaks can minimize incident recurrence, initiate appropriate cleanup activities and comply with legal requirements. Records of significant spills and leaks should include the following, as appropriate:

• The date, weather conditions, duration, cause, environmental problems, response procedures, parties notified, recommended revisions to the SWPPP and operating procedures, and/or equipment needed to prevent recurrence.

An attached form included in Appendix C, Worksheet #2B – List of Significant Spills and Leaks (or comparable) may be used to document applicable spills or leaks should they occur. It is noted that there have been no reportable spills at the facility.

A Monthly Spill & Leak Log Sheet is provided in **Appendix D** that is required to be completed each month by ACT5 T-2(4) of the facility's General Storm Water Permit. A separate form is required each month. If no spills or leaks have occurred, the form shall be completed by checking the available box and signing it as indicated.



4.0 BEST MANAGEMENT PRACTICES AND CONTROLS

The focus of the following sections of the SWPPP is to document Best Management Practices (BMP) and other storm water management practices/controls identified that the Amite facility has implemented to minimize and/or prevent the discharge of potential pollutants to storm water runoff from the facility.

4.1 SEDIMENT AND EROSION CONTROL

The main areas of erosion are surrounding log, chip, and bark piles on the site. Runoff collected by the storm water conveyance system near these piles flows to a retention pond that settles solids and promotes biodegradation of organics that may be present in the runoff. After the runoff accumulates in one of three on-site ponds, it discharges through one of three outfalls (Outfalls 001 through 003). Jar tests are performed monthly for each Outfall, following a rain event, in order to observe if excessive sediment is present in discharged storm water from the facility.

4.2 GOOD HOUSEKEEPING

Measures designed to maintain a clean, orderly, and safe work environment also contribute to the prevention of pollutants comingling with and impacting storm water runoff. Good housekeeping also reduces the potential for accidental spills caused by the mishandling of significant materials, thereby enhancing the safety of plant personnel.

4.1.1 Operation and Maintenance

The following general practices are incorporated into Amite's good housekeeping program:

- Regularly pick up and dispose of garbage, debris or waste material found in, and around the facility including containment areas;
- Routinely perform cleanup operations where pollutants may enter storm water discharges;
- Provide waste receptacles at convenient locations and adequately maintain sanitary facilities;
- Conduct monthly inspections for signs of erosion; and,
- Conduct monthly inspections for leaks that could lead to discharges of chemicals and petroleum products or for conditions where storm water contacts raw materials, waste materials, or final products.



4.1.2 Material Storage Practices

The following proper storage techniques will be followed:

- Storage containers and drums are moved away from direct traffic routes to prevent accidental spills;
- Adequate aisle space is maintained to facilitate material transfer and easy access for inspections and will be inspected once every month; and
- Chemicals, oils, and petroleum products will be stored indoors or inadequate secondary containment whenever possible. Any chemical containers stored outdoors will be wiped clean of any residue prior to storage.

4.1.3 Material Inventory Procedures

The following inventory procedures will be followed:

- Chemicals, oils, and petroleum products added to the process or stored on site will be added to the description of the exposed significant material list located in Section 3.3. Safety data sheets (SDS) will be retained on-site for all chemicals used in the workplace.
- Containers will be labeled to show the name, type of substance, stock number, expiration date, health hazards, suggestions for handling, and first aid information; and
- Materials, including but not limited to hazardous and recyclable materials that require special handling, storage, use, and special consideration will be clearly marked on the container.

4.3 SPILL PREVENTION AND RESPONSE PROCEDURES

It is Amite's policy that spills/releases of significant materials with the potential to impact storm water runoff from the site will be properly responded to in accordance with spill prevention and response measures and applicable regulations.

The use of detergents, emulsifiers, or dispersants to clean up spilled product is prohibited except where necessary to comply with state or federal safety regulations (i.e., requirement for non-slippery work surface). In all such cases, initial cleanup will be done by physical removal and chemical usage will be minimized.

Materials spilled/released will be properly contained, recovered, and disposed of following state and federal regulations, to prevent contamination of storm water. Significant spill incidents



requiring notification to regulatory agencies will be reported in accordance with state and federal regulations and in accordance with the facility's SPCC Plan.

4.4 PREVENTIVE MAINTENANCE

The preventive maintenance program involves the monthly inspection and maintenance of storm water management devices and the inspection of potential pollutant sources to preclude breakdowns or failures, which could result in discharges of polluted storm water.

Equipment maintenance, performed as part of this program, and other routine maintenance programs include the following:

- Cleaning manufacturing equipment stored outdoors;
- Cleaning accumulated sediment and oily soils from containment areas and loading areas;
- Inspecting areas for erosion;
- Clearing of debris from drainage conveyances; and
 - Checking containment structures.

A comprehensive SWPPP evaluation will be conducted annually at the site. A monthly inspection related to the facility's preventive maintenance program is included in **Appendix D**, **Form 2 – Monthly Inspection Report Form**.

4.5 INSPECTIONS AND RECORDS

The outfalls are checked daily for the presence of sheen, deposits, or stains. Formal inspections are conducted monthly and documented on the checklist attached in Appendix E - Facility Inspection Forms (Monthly). Detailed information regarding weekly and monthly inspections is included in Sections 5.2 and 5.3 of this SWPPP.

A formal site inspection is conducted annually as part of the required comprehensive site evaluation. Areas of the facility identified in Section 3.3 of this plan, as well as existing BMPs, are evaluated and inspected. Results of these annual inspections will be retained with the SWPPP for a period of at least three years from the date of the inspection. Further information about the annual site evaluation/inspection is included in Sections 5.4 and 6.3 of this SWPPP. The formal site inspection form is provided in Appendix E, Annual Comprehensive SWPPP Evaluation Report.



4.6 EMPLOYEE TRAINING AND COMMUNICATION

Training will be provided to all employees that work in areas where industrial materials or activities are exposed to storm water and for employees who are responsible for implementing BMP's identified in the SWPPP. Training will be provided upon initial hire and annually thereafter. Unscheduled training may be conducted as a follow-up to any significant spill or leak that may occur at the facility.

This training will, at a minimum, address:

- Housekeeping and pollution prevention requirements;
- Spill prevention and response procedures;
- Installation, maintenance, and inspection of erosion and sediment controls for construction activities;
- Installation, maintenance, and inspection of BMPs for industrial storm water and/or postconstruction storm water;
- Procedures for monitoring compliance with non-numeric and numeric limitations prescribed in the General Storm Water Permit for the facility;
- Recordkeeping, reporting, and record retention requirements (includes understanding the records filing system and being able to produce the required permit documentation during a regulatory on-site inspection);
- Release reporting and non-compliance notification requirements; and,
- Standard requirements contained in the General Storm Water Permit for the facility.

Pollution prevention training will be documented as to the date training occurred, employees present, and topics covered (see **Appendix F**, **Employee Training Logs**). Training records will be maintained for at least three years from the date of the training.

4.7 MANAGEMENT OF STORM WATER RUNOFF

Amite's SWPPP is intended to address appropriate and reasonable avenues for maintaining the integrity of storm water runoff and preventing water pollution from the facility. Traditional storm water management measures like drainage conveyances, ditches, drains, underground piping, and culverts are in place at the facility and are designed to divert runoff from coming into contact with potential pollutant sources. Additionally, source control measures are used to prevent runoff from contacting potential pollutant sources.



4.8 SAMPLING AND ANALYSIS OF STORM WATER DISCHARGES

Routine storm water sampling is not required for the facility's three outfalls. Every month, a storm water sample from each outfall will be collected in a clear jar and will be inspected in accordance with MDEQ guidelines, using the **Monthly Visual Jar Test Inspection Form** included in **Appendix D**.

4.9 FACILITY SECURITY

A Facility Security Plan (FSP) is not required for this facility. The site is well-lit by exterior lighting, and the perimeter is fenced. Also, the AST areas are secured at all times and only accessible to authorized personnel.



5.0 LIMITATIONS, INSPECTIONS, AND EVALUATIONS

5.1 STORM WATER DISCHARGE NON-NUMERICAL LIMITATIONS

The following non-numerical limitations apply to storm water at the facility. Storm water will be free from:

- Debris, oil scum, and other floating materials other than in trace amounts;
- Eroded soils and other materials that will settle to form objectionable deposits in receiving streams;
- Suspended solids, turbidity and color at levels inconsistent with receiving streams; and
- Chemicals in concentrations that would cause violation of state water quality criteria in receiving streams.

5.2 WEEKLY VISUAL SITE INSPECTIONS

The Safety Manager or designee will perform weekly visual inspections of facility equipment and material handling areas for evidence of pollutants comingling with storm water effluent and verify the description of potential pollutant sources and the implementation of management controls. The following areas will be inspected:

- Waste storage areas;
- Loading/unloading areas;
- Chemical, oil, and petroleum storage areas;
- Containment dikes;
- Process areas;
- Potential erosion areas;
- Debris areas;
- Vehicle parking areas; and
- Storm water conveyance areas.



5.3 MONTHLY ROUTINE SITE INSPECTIONS

Monthly routine visual site inspections will be performed and documented on the Monthly Inspection Form (**Appendix D**). Storm water inspections will be performed as often as needed but not less than once monthly. If feasible, inspections will be conducted during or after storm events. If deficiencies in the SWPPP are discovered during an inspection, the identified deficiencies must be corrected as soon as possible.

As part of the inspection, storm water will be collected at each storm water outfall in a clean, clear jar and examined in a well-lit area. Should objectionable characteristics be observed, Amite will investigate upstream of the sample location to identify and correct potential sources of pollution. The results of the jar test inspection will be recorded on the Jar Test Form, provided in **Appendix D**. The results of inspections and corrective actions will be documented on the appropriate forms in **Appendix D**.

Records obtained during the monthly inspection will be retained on-site for a minimum of three years from the date of the inspection. The Safety Manager will be responsible for implementing record-keeping procedures.

5.4 ANNUAL SITE EVALUATION

A comprehensive SWPPP evaluation must be conducted at least annually by December 31 of each year in addition to monthly visual inspections. The objective of the evaluation is to assess the overall effectiveness of the SWPPP, assess the implementation of the BMPs, and to modify or improve the SWPPP, as needed. The Annual Comprehensive SWPPP Evaluation form is provided in **Appendix E**. Findings documented from monthly visual inspections will be considered as part of the annual site evaluation.

The annual site/SWPPP evaluation will address the following elements:

- Determine if pollution prevention measures are accurately identified in the plan and are in place and working;
- Inspect areas of storm water conveyance for evidence of pollutants which may adversely affect the receiving stream;
- Verify and update potential pollutant sources;
- Document findings;
- Modify or update the site map to reflect current conditions; and



• Complete needed SWPPP modifications.

Records obtained during the annual site evaluation will be retained on-site for a minimum of three years from the date of the annual site evaluation. The Safety Manager will be responsible for implementing recordkeeping procedures.



6.0 **REPORTING**

6.1 CHANGES TO THE SWPPP

6.1.1 Annual SWPPP Update

Based upon the findings of the annual site evaluation, Amite will amend the SWPPP whenever there is a change in design, construction, operation, or maintenance, which may potentially increase the discharge of pollutants to State Waters, or the plan proves to be ineffective in controlling storm water pollutants. Amite will submit the amended SWPPP to the MDEQ within 30 days following any amendments.

6.1.2 SWPPP Modifications

If at any time Amite is alerted by the MDEQ that the SWPPP does not meet the minimum requirements, the SWPPP will be amended. A written certification and the amended SWPPP will be submitted to the Executive Director within 30 days of the amendment.

The SWPPP will be modified whenever there is a change in design, construction, operation, or maintenance, which may increase the discharge of pollutants to state waters or the SWPPP proves to be ineffective in controlled storm water pollutants. The amended SWPPP will be submitted to the MDEQ within 30 days of amendment.

If a specific waste-load allocation is established that would apply to the facility's discharge, Amite will implement steps necessary to meet that allocation.

6.2 GENERAL STORM WATER PERMIT RE-COVERAGE

When the General Storm Water Permit for the facility is renewed, the SWPPP is not required to be submitted if it is on-site, current, and effective in controlling storm water pollutants at the facility. At re-issuance, the facility will complete the SWPPP Certification Form for the General Storm Water Permit Re-Coverage certifying that the SWPPP is on-site, current, and effective in controlled storm water pollutants.

If the SWPPP is no longer current or does not effectively control storm water pollutants at the facility, a revised SWPPP will be submitted to MDEQ as an attachment to the General Storm Water Permit Re-Coverage form submitted for re-issuance of the permit. Please note that the General Permit Re-coverage forms must be submitted at least 180 days prior to permit expiration.



6.3 ANNUAL COMPREHENSIVE EVALUATION

The completed Annual Comprehensive SWPPP Evaluation form (**Appendix E**) is no longer required to be submitted to the MDEQ, but it must be retained on-site for a minimum of three years from the date of the annual site evaluation. The Safety Manager will be responsible for implementing recordkeeping procedures.

6.4 PLANNED CHANGES REPORTING

Amite will give notice to MDEQ's Permit Board if planned physical alterations or additions, including but not limited to changes in facility operations, equipment, and/or maintenance. Notice is required if the alteration or addition:

- May meet one of the criteria for determining whether the facility is a new source in 40 CFR 122.29(b);
- Could significantly change the nature or increase the quantity of pollutants discharged.
- Results in a significant change in the facility's sludge use or disposal practices.

6.5 NON-COMPLIANCE REPORTING

In the event of anticipated non-compliance, Amite will give at least ten days advance warning, if possible, before any planned non-compliance with the facility's General Storm Water Permit.

In the event of an unanticipated non-compliance event, Amite will notify the MDEQ orally within 24 hours from the time that facility management becomes aware of the unanticipated non-compliance.

A written notice will be provided to the MDEQ within five working days of the time that facility management becomes aware of the circumstances. The written report must include the following:

- Description of the non-compliance and its cause;
- The period of non-compliance (including exact dates and times);
- The anticipated time the noncompliance is expected to continue (if it has not been corrected yet); and,
- The steps are taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.

Amite will report all other instances of noncompliance not reported under the 24-hour reporting requirements at the time monitoring reports are submitted or within 30 days from



the end of the month in which the noncompliance occurs. The reports must contain the same above information.

6.6 UNAUTHORIZED DISCHARGES REPORTING

Amite will report unauthorized discharges that may impact human health or the environment, and spills that exceed reporting thresholds will be reported to all applicable agencies. If the discharge involves more than 42 gallons of oil or could result in an emergency condition, the Safety Manager will immediately call the

- National Response Center (800) 424-8802
- EPA Region IV (404) 562-8700
- Mississippi Emergency Management Agency (EMA) (601) 250-0087
- Local Police 911

An emergency condition is a condition that could reasonably be expected to endanger or impact the health or safety of the public; cause significant adverse impact to the land, water, or air; or cause severe damage to property. Notification required by this section must be made regardless of the amount of discharge. Written follow-up notification will be provided within five days of the time that Amite becomes aware of the circumstances.

The written report will contain the following information:

- A description of the non-compliance and its cause
- The period of non-compliance, including exact dates and times, and the anticipated time until non-compliance is corrected (if the non- compliance has not been corrected).
- Steps taken to reduce, eliminate, and prevent recurrence of the non-complying discharge

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the EPA Regional Administrator whenever the facility discharges (as defined in 40 CFR 112.1(b)) *more than 1,000 gallons of oil in a single event,* or discharges (as defined in 40 CFR 112.1(b)) *more than 42 gallons of oil in each of two discharge incidents within 12 months.* The following information must be submitted to the EPA Regional Administrator within 60 days:

- Name of the facility
- Name of the owner/operator
- Location of the facility



- Maximum storage or handling capacity and normal daily throughput
- Corrective action and countermeasures are taken, including a description of equipment repairs and replacements
- Description of facility, including maps, flow diagrams, and topographical maps
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including failure analysis of the system and subsystem in which the failure occurred
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence
- Other pertinent information requested by the Regional Administrator



7.0 AUTHORIZED REPRESENTATIVE CERTIFICATION

This SWPPP has been developed for the Amite facility to ensure the implementation of BMPs, which will reduce pollutants in storm water discharges and assure compliance with the terms and conditions of Coverage No. MSR002404.

I certify under penalty of law that the information submitted is, to the best of my knowledge, true, accurate and complete.

Signature: Muth. Wats Name (Printed): Daniel G. Watt Title: Mant Manager

Date: 04/27/20

Telephone: <u>318-351-012</u>7

APPENDICES



