



INDUSTRIAL STORMWATER GENERAL PERMIT RE-COVERAGE FORM

FOR COVERAGE UNDER MISSISSIPPI'S REISSUED
INDUSTRIAL STORMWATER GENERAL PERMIT MSR00
GENERAL NPDES COVERAGE NO. MSR00 110049

INSTRUCTIONS

The submittal of this form is required to receive coverage under the reissued Industrial Stormwater General Permit. This form must be completed and returned to the address printed at the bottom of page 2.

The signatory of this form must be the owner or operator who is the current coverage recipient (rather than the plant/site manager or environmental consultant). The coverage recipient is responsible for permit compliance.

Amendments to the Storm Water Pollution Prevention Plan (SWPPP) are required to be attached if the plan is not current or is ineffective in controlling storm water pollutants.

If the facility is out of business or no longer a regulated facility, please request termination of coverage by completing the Request for Termination (RFT) Form found in the Industrial Stormwater Forms Package. Facilities that continue to discharge wastewater without applicable permit coverage are in violation of state law.

Do not submit this form if submitting a "Request for Termination" (RFT).

Do not submit this form if submitting a "No Exposure Certification."

ALL INFORMATION MUST BE COMPLETED (Enter "NA" if not applicable).

COVERAGE RECIPIENT INFORMATION

CONTACT NAME & POSITION: John Risher, EHS Manager

EMAIL ADDRESS: jrisher@howard-ind.com

COMPANY NAME: Howard Industries

STREET OR P.O. BOX: P.O Box 1588

CITY: Laurel STATE: Mississippi ZIP: 39441

PHONE NUMBER (INCLUDE AREA CODE): 601-422-1919

FACILITY INFORMATION

FACILITY NAME: Howard Industries

CONTACT NAME & POSITION: John Risher, EHS Manager

CONTACT PHONE NUMBER (INCLUDE AREA CODE): 601-422-1919

PRIMARY STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODE & DESCRIPTION OF INDUSTRIAL ACTIVITY:
3012 Power Distribution and Speciality Transformers

re-received via email 3/18/21

PHYSICAL SITE ADDRESS
STREET: 3225 Pendorf Road

CITY: Laurel **COUNTY:** Jones **ZIP:** 39441

PROVIDE THE COORDINATES OF THE PLANT ENTRANCE:
LATITUDE: N31 degrees 39 minutes 23.8 seconds **LONGITUDE:** W89 degrees 10 minutes 37.9 seconds

NEAREST NAMED RECEIVING STREAM FOR STORM WATER LEAVING THE SITE: Tallahoma Creek

IS RECEIVING STREAM ON MDEQ's 303(d) LIST? YES NO

IF YES, HAS A TMDL BEEN ESTABLISHED FOR THE RECEIVING STREAM SEGMENT? YES NO

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

IS A COPY OF THE SWPPP AT THE PERMITTED SITE? YES NO

IS THE SWPPP UP-TO-DATE AND EFFECTIVE IN CONTROLLING STORM WATER POLLUTANTS? YES NO

IF NO, PLEASE ATTACH REQUIRED SWPPP AMENDMENTS (see Instructions on front page).

AUTO SALVAGE FACILITIES ONLY

FOR AUTO SALVAGE FACILITIES, A REVISED SWPPP TO COMPLY WITH THE NEW PERMIT MUST BE SUBMITTED TO MDEQ NO LATER THAN JANUARY 31, 2022.

DOES THE SWPPP REQUIRE CHANGES TO COMPLY WITH THE NEW PERMIT? YES NO

IS A REVISED COPY OF THE SWPPP ATTACHED? YES NO

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 fines and imprisonment for knowing violations.

I further certify that I understand when coverage is terminated the facility is no longer authorized to discharge storm water associated with industrial activity under this general permit. I understand that discharging pollutants in storm water associated with industrial activity to waters of the state without NPDES coverage is in violation of state law.

Jack Delk
 Signature¹

Jack Delk
 Printed Name¹

March 17, 2021
 Date

Executive Vice President
 Title

¹This form shall be signed according to ACT16, T-9 of the General Permit, 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, 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, Mississippi 39225



HOWARD INDUSTRIES, INC.

P. O. Box 1588, Laurel, MS 39441 Telephone: (601) 425-3151 Facsimile: (601) 422-1195

March 17, 2021

Ms. Florance Bass
OPC/Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225-2261

Re: Re-Coverage Form for Baseline Storm Water General NPDES Permit
Howard Industries – Mendenhall Facility AI ID: 14684
Water – NPDES Permit #: MSR001883
Howard Industries – Laurel Facility AI ID: 1064
Water – NPDES Permit #: MSR110049
Howard Industries – Ellisville Facility AI ID: 17987
Water – NPDES Permit #: MSR001766
Howard Industries – Sandersville Facility AI ID: 23242
Water – NPDES Permit #: MSR001860

Dear Ms. Bass:

Howard Industries respectfully submits the enclosed Re-coverage Form requesting a permit for storm water discharge under Mississippi's Baseline Storm Water General National Pollution Discharge Elimination System (NPDES) Permit for the above referenced facilities.

In 2020, Howard Industries – Laurel Facility began adding a concrete pad northeast of the tank farm across Industrial Boulevard which was completed in January of 2021. The concrete pad will be used as a transformer storage yard, taking the place of the transformer boneyard previously named in the Appendix C tables of the SWPPP. The concrete pad, named the Delphi Transformer Storage Yard, is also shown in the updated Figure 2 in Appendix B of the SWPPP. The pages that have been updated in the SWPPP are attached to the Re-coverage Form.

If you have any questions or concerns pertaining to this information, please contact me at (601) 422-1919.

Sincerely,



John Risher
EHS Manager

Enclosure

**Record of SWPPP Review Amendments
Howard Industries – Laurel Facility**

Date	Reviewer	Section	Amendments	Responsible Party Initials
November 2010	PPM Consultants, Inc.	All	Technical Update of Entire Plan	PPM Consultants, Inc.
March 2017	EnSafe Inc.	All	Technical Update of Entire Plan	FE/GP
January 2021	EnSafe, Inc.	Appendix C-Facility Oil Storage	Update to Include new Delphi Storage Yard	JH/GP

3.0 INVENTORY OF POTENTIAL POLLUTANT SOURCES AND CORRESPONDING BMPs

Tables C-1 through C-3 in Appendix C provide an inventory of oil storage containers and other sources of potential pollutants:

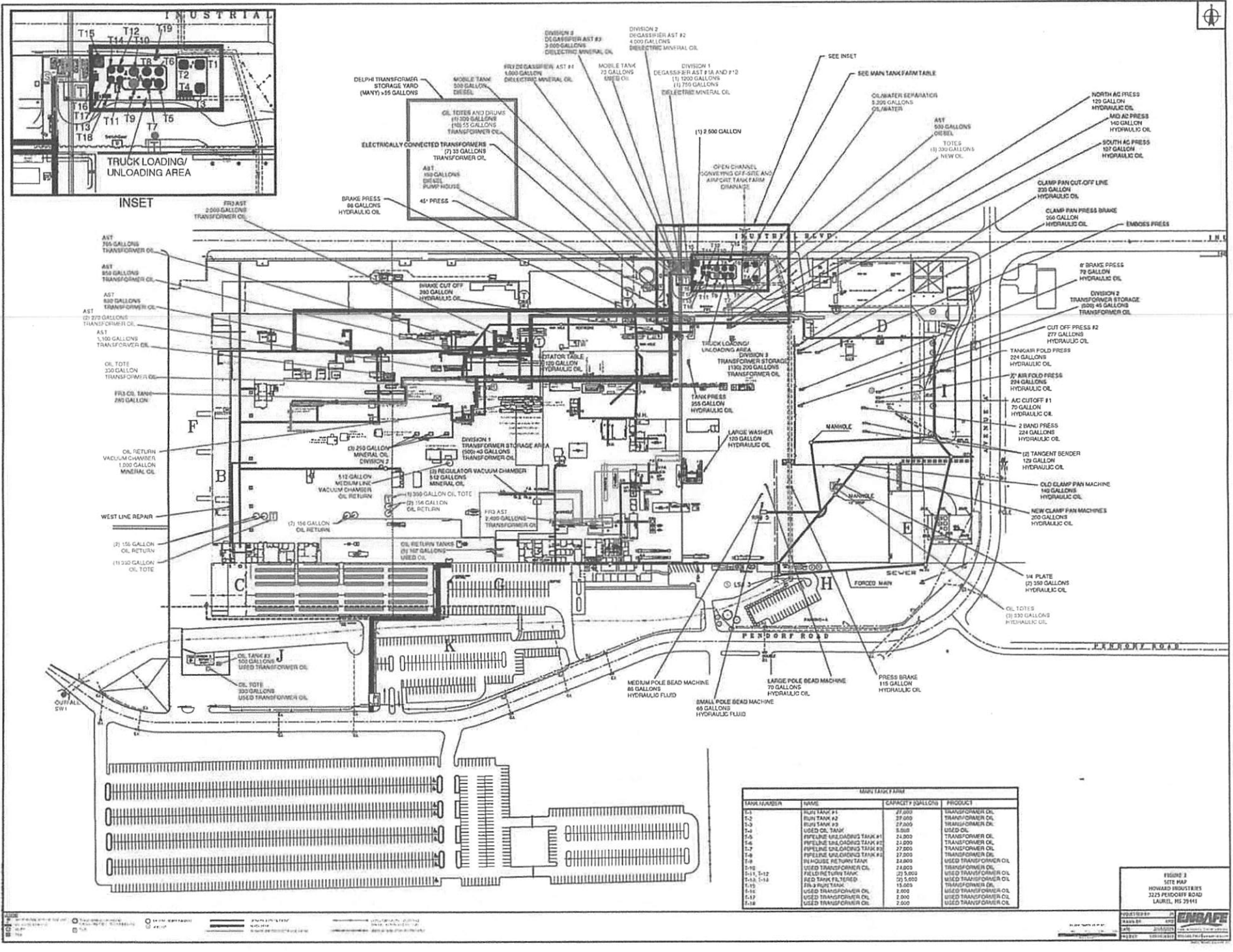
- Table C-1, Facility Oil Storage and Potential Pollutant Inventory — Aboveground Storage Tanks, Totes and Drums
- Table C-2, Facility Oil Storage and Potential Pollutant Sources Inventory — Oil-Filled Operational Equipment
- Table C-3, Facility Oil Storage and Potential Pollutant Sources Inventory — Oil-Water Separators

The tables describe the type of material potentially exposed to storm water, the type and location of storage, flow direction, existing structural and nonstructural controls, and existing and needed BMPs. In 2020, Howard Industries began adding a concrete pad northwest of the tank farm across Industrial Boulevard which was completed in January of 2021. The concrete pad will be used as a transformer storage yard, taking the place of the transformer boneyard previously named in the Appendix C tables. The concrete pad, named the *Delphi Transformer Storage Yard*, is shown in the updated Figure 2 in Appendix B.

3.1 BMPs

U.S. EPA emphasizes implementing pollution prevention measures and BMPs that reduce possible pollutant discharges at the source. Source reduction measures include, among others, preventive maintenance (PM), chemical substitution, spill prevention, good housekeeping, training, and proper materials management. Where such practices are not appropriate to a particular source or do not effectively reduce pollutants in storm water discharges, U.S. EPA supports using source control measures and BMPs such as material segregation or covering, water diversion, and dust control. Like source reduction measures, source control measures and BMPs are intended to keep pollutants out of storm water. The remaining classes of BMPs, which involve recycling or storm water treatment, allow reusing storm water or attempting to lower pollutant concentrations before discharge.

BMPs are to be implemented to the MEP. Due to changing technology, MEP is an ever-changing goal. The SWPP Team will continue to review activities at the HI Laurel location to determine what additional BMPs should be implemented at the facility. Additional BMP needs could result from



MAIN TANK FARM

TANK NUMBER	NAME	CAPACITY (GALLONS)	PRODUCT
T-1	RUN TANK #1	27,000	TRANSFORMER OIL
T-2	RUN TANK #2	27,000	TRANSFORMER OIL
T-3	RUN TANK #3	27,000	TRANSFORMER OIL
T-4	USED OIL TANK	5,000	USED OIL
T-5	PIPELINE ISOLATING TANK #1	27,000	TRANSFORMER OIL
T-6	PIPELINE ISOLATING TANK #2	27,000	TRANSFORMER OIL
T-7	PIPELINE ISOLATING TANK #3	27,000	TRANSFORMER OIL
T-8	PIPELINE ISOLATING TANK #4	27,000	TRANSFORMER OIL
T-9	HOUSE FILLER TANK	28,000	USED TRANSFORMER OIL
T-10	USED TRANSFORMER OIL	28,000	TRANSFORMER OIL
T-11, T-12	FILLING TANK	275,000	USED TRANSFORMER OIL
T-13, T-14	SEW TANK FILTERED	275,000	USED TRANSFORMER OIL
T-15	FR-3 RUN TANK	18,000	TRANSFORMER OIL
T-16	USED TRANSFORMER OIL	2,000	USED TRANSFORMER OIL
T-17	USED TRANSFORMER OIL	2,000	USED TRANSFORMER OIL
T-18	USED TRANSFORMER OIL	2,000	USED TRANSFORMER OIL

FIGURE 3
 SITE MAP
 3275 PENDORF ROAD
 LAUREL, MS 39111

ENBAPE



Facility Oil Storage Inventory Oil-Filled Operational Equipment											
Location or Building No.	Container Type	Product Stored	Container Capacity (gallons)	Model No. or Equipment Type	Container Material	Good Engineering Practices	Type of Failure	Lighting/Fencing	Flow Direction and Distance/Receiver/Drainage Basin	Containment or Diversion Structure	Description of Key Best Management Practices/Deficiencies
Electrically-Connected Transformers for the Plant											
Transformers A-L (see map for locations: one inside building, the rest are located around the perimeter of the plant)	Transformer	Transformer Oil	12 @ 538	NA	Steel	None	Leaking	Y / Y	Outside / Storm drain inlets / Ditch / West to Outfall #1 / DB#1	None	Preventive maintenance, inspection and spill response / None
Transformers M-T (located east of the Fire Pump House)	Transformer	Transformer Oil	7 @ 35	NA	Steel	None	Leaking	Y / Y	Outside / South to ditch / West to Outfall #1 / DB#1	None	Preventive maintenance, inspection and spill response / None
Transformer Storage Areas											
Division 1 — Transformer Storage Area	Transformer	Transformer Oil	500 @ 40	NA	Steel	None	Leaking	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 2 — Transformer Storage Area	Transformer	Transformer Oil	600 @ 45	NA	Steel	None	Leaking	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 3 — Transformer Storage Area	Transformer	Transformer Oil	130 @ 200	NA	Steel	None	Leaking	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Delphi Transformer Loading Yard	Transformer	Transformer Oil	400 @ 200	NA	Steel	None	Leaking	Y / Y	Outside / South to ditch / West to Outfall #1 / DB#1	None	Preventive maintenance, inspection and spill response / None
Southwest Corner Transformer Loading Yard	Single Phase Pad Transformer	Transformer Oil	Many @ 50	NA	Steel	None	Leaking	Y / Y	Outside / South to ditch / West to Outfall #1 / DB#1	None	Preventive maintenance, inspection and spill response / None
North Central Transformer Loading Yard	Transformer	Transformer Oil	Many @ >55	NA	Steel	None	Leaking	Y / Y	Outside / South to ditch / West to Outfall #1 / DB#1	None	Preventive maintenance, inspection and spill response / None
Delphi Transformer Storage Yard	Transformer	Transformer Oil	Many @ >55	NA	Steel	None	Leaking	Y / Y	Outside / South to ditch / West to Outfall #1 / DB#1	None	Preventive maintenance, inspection and spill response / None
Division 3 — Inside Manufacturing Building											
Division 1 & 2 / Southeast corner of Manufacturing Building	Clamp Pan Machine	Hydraulic Oil	140	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / Southeast corner of Manufacturing Building	New Clamp Pan Machine	Hydraulic Oil	200	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / Southeast corner of Manufacturing Building	Press Brake	Hydraulic Oil	115	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / Southeast corner of Manufacturing Building	Large Pole Bead Machine	Hydraulic Oil	70	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / Southeast corner of Manufacturing Building	Medium Pole Bead Machine	Hydraulic Oil	86	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / Southeast corner of Manufacturing Building	Small Pole Bead Machine	Hydraulic Oil	86	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / Southeast corner of Manufacturing Building	B/W clamp Pan Machines	Hydraulic Oil	200	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / Southeast corner of Manufacturing Building	Near Clamp Pan Machines	Hydraulic Oil	2 @ 350	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / South central area of Manufacturing Building	Regulator Vacuum Chamber	Mineral Oil	512	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None
Division 1 & 2 / South central area of Manufacturing Building	Large Washer	Hydraulic Oil	120	NA	Steel	None	Leakage	Y / Y	Inside Manufacturing Building / Building equipped with diked floor drains / DB#1	Inside Building	Inside Manufacturing Building / Building equipped with diked floor drains / None