AI 1534 MSR002427

ECS
ENVIRONMENTAL COMPLIANCE & SAFETY, INC.

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Jackson Area Office:
109 Millcreek Corners, Suite A
Brandon, MS 39047
www.envirocomp.net
Established in 2002

December 04, 2020

Ms. Florance Bass
401/Stormwater Branch Manager
Environmental Permits Division
Mississippi Department of Environmental Quality
P. O. Box 2261
Jackson, MS 39225-2261

Re: ***Baseline Notice of Intent (BNOI) and Storm Water Pollution Prevention Plan (SWPPP)***
Hankins Timbers, LLC
Grenada, Mississippi
Grenada County

Dear Ms. Bass:

Hankins Timbers, LLC has retained the services of Environmental Compliance & Safety, Inc. (ECS) to prepare the Baseline Notice of Intent (BNOI) form and a Storm Water Pollution Prevention Plan (SWPPP) for the above-referenced facility. Enclosed you will find the BNOI form and SWPPP that reflects facility operations and includes storm water best management practices. The SWPPP has been developed to comply with the requirements of the General Baseline Permit for Stormwater Discharges from Industrial Activities.

If you have any questions concerning the attached information, please feel free to contact me at (662) 840-5945 or Wayne Harlow at (662) 809-8929.

Sincerely,

Caitlin Golding

Caitlin Golding
Project Manager

Enclosures

RECEIVED
DEC 15 2020
MDEQ

BASELINE NOTICE OF INTENT (BNOI)

RECEIVED
DEC 15 2020
MDEQ

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

BASELINE NOTICE OF INTENT (BNOI)

FOR COVERAGE UNDER THE BASELINE STORM WATER GENERAL NPDES PERMIT MSR00 _ _ _ _

(NUMBER TO BE ASSIGNED BY STATE)

INSTRUCTIONS

Applicant must be the owner or operator (i.e., legal entity that controls the facility's operation, or the plant/site manager, not the environmental consultant). The owner or operator that receives coverage is responsible for permit compliance. File at least 60 days prior to the commencement of the regulated industrial activity.

Submittals with this 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: ☑ OWNER ☑ OPERATOR (PLEASE CHECK ONE OR BOTH)

OWNER INFORMATION

Owner Contact Name: Albert B. Hankins, Jr. **Position:** Manager

Owner Company Name: Hankins Timbers, LLC

Owner Street (P.O. Box): P.O. Box 1397

Owner City: Grenada **State:** MS **Zip:** 38902

Owner Phone Number: (662) 809-3380 **Owner Email:** _____

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: (Same as above) **Position:** _____

Operator Company Name: _____

Operator Street (P.O. Box): _____

Operator City: _____ **State:** _____ **Zip:** _____

Operator Phone Number: (____)_____ **Operator Email:** _____

FACILITY INFORMATION

Facility Name: Hankins Timbers, LLC

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

SIC Code: 2 4 2 1 Sawmills and Planing Mills

Receiving Stream: Batupan Bogue 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: 228 Murff Drive **City:** Grenada

County: Grenada **Zip:** 38902

Latitude: 33 **degrees** 42 **minutes** 28 **seconds** **Longitude:** 89 **degrees** 45 **minutes** 46 **seconds**

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

Attach a copy of any existing laboratory data for each storm water outfall. If multiple sampling has been performed, provide a summary for each parameter, including sampling dates and the minimum, average and maximum values.

Is this a SARA Title III, Section 313 facility utilizing water priority chemicals at threshold amounts? ☐ Yes ☑ No
If yes, please attach a list of water priority chemicals present at the facility.

DOCUMENTATION OF COMPLIANCE WITH OTHER REGULATIONS/REQUIREMENTS

Is this notice for a facility that will require other permits? ☑ **Yes** ☐ **No**

If yes, check which one(s): ☑ **Air,** ☐ **Hazardous Waste,** ☐ **Pretreatment,** ☐ **Water State Operating,** ☑ **Individual NPDES, or list Other(s):**

Wet Deck Log Spray General Permit

How will sanitary sewage be collected and treated? Sent to local POTW

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

N/A

Is treatment of storm water provided at any outfall? ☑ **Yes** ☐ **No**

If yes, please describe: Sedimentation/Retention Pond for Wet Deck.

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.

Albert B Hankins

Signature[1] (Must be signed by operator when different than owner)

12/10/20

Date Signed

Albert B. Hankins, Jr.

Printed Name[1]

Manager

Title

[1]This 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

INDUSTRIAL STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

INDUSTRIAL STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

HANKINS TIMBERS, LLC
228 Murff Drive
Grenada, MS 38902

ECS

ENVIRONMENTAL COMPLIANCE & SAFETY, INC.

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"FOR ALL YOUR ENVIRONMENTAL AND SAFETY CONSULTING NEEDS."

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FIGURES:

Figure 1: Site Location Map
Figure 2: Aerial Map
Figure 3: Storm Water Flow Diagram

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
Appendix G: Industrial Baseline Storm Water General Permit for Industrial Activities

RECORD OF REVISIONS

Revision Date	Reason for Revision	Revised Pages, Tables, Figures, or Appendices	Person(s) Responsible for Revisions
12/04/2020	Developed SWPPP to comply with Mississippi Industrial Storm Water General Permit for Industrial Activities.	Entire document.	Casey Creaden (ECS) Caitlin Golding (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.

Signature

12/10/20
Date

Albert B. Hankins, Jr.
Name (Printed)

Manager
Title

Hankins Timbers, 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 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 S. Ketchum, P.E.
Principal, Senior Engineer
Environmental Compliance & Safety, Inc.

12/04/2020
Date

State of Mississippi
Registration No. 13372
(Seal)

BRIAN S. KETCHUM
LICENSED PROFESSIONAL
ENGINEER
13372
STATE OF MISSISSIPPI

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.

Hankins Timbers, LLC (Hankins Timbers) located at 228 Murff Drive in Grenada, Mississippi is classified under Standard Classification Code (SIC) 2421 – Sawmills and Planing Mills. Based on this SIC Code, 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).

Hankins Timbers has prepared a SWPPP for operations at the Grenada, 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:	Hankins Timbers, LLC				
Mailing and Physical Address:	P.O. Box 1397, Grenada, MS 38902 and 228 Murff Drive, Grenada, MS 38902				
Location (GPS):	Latitude:	33° 42' 28.06" N	Longitude:	89° 45' 46.06" W	
SWPPP Contact:	Wayne Harlow, Purchasing Agent				
Office: (662) 294-3000	**Cell:**	(662) 809-8929	**Email:**	wayneharlow@hankinslumber.com	
Storm Water Outfalls:					
SW001	**Latitude:**	33° 42' 32.23" N	**Longitude:**	89° 45' 59.74" W	
SW002	**Latitude:**	33° 42' 26.13" N	**Longitude:**	89° 45' 37.29" W	
SW003	**Latitude:**	33° 42' 35.65" N	**Longitude:**	89° 45' 38.99" N	
Closest Water Body and Route of Entry:	Sheet flow into drainage ditches along the northwest, east, and southeast boundaries before eventually entering Batupan Bogue Creek.				
Water Body on 303d List as Impaired?	No	**Impairment and/or TMDL:**	N/A		
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

Hankins Timbers is located at 228 Murff Drive in Grenada, Mississippi. The entire site encompasses approximately forty-one (41) acres. Approximately 50 percent of the property is covered by impervious material (concrete and asphalt), and the remaining 50 percent is covered with grass or natural vegetation. Approximately 174,000 square feet of manufacturing operations are covered under roof. The facility operations fall primarily within Standard Industrial Classification (SIC) Code 2421, Sawmills and Planing Mills. The adjacent properties are either unoccupied or used for residential 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

Hankins Timbers is a timbers manufacturing mill where small southern yellow pine logs are cut into 4"x4", 4"x6", and 6"x6" timbers. The mill operations include a wet deck and dry deck log storage area, debarking, sawmill, one (1) wood-fired kiln, planer mill, and finished product storage. Offices, a maintenance shop, parking areas, and bulk storage for diesel, gas, and hydraulic oil are also located on the property.

Incoming southern yellow pine logs will be brought to the site by truck and stored onsite. The logs will be sent through the debarker where the bark will be conveyed to a truck loadout and sold off-site. After the logs have been debarked, they will be sent through one of the two (2) cutting lines at the sawmill to be cut to specification with sawdust being sent with bark to the truck loadout. Any non-uniform or miscellaneous timbers will be sent through the chipper and conveyed to a chip bin and sold off-site.

Once the timbers are cut to specification, they will be stacked and dried in the wood-fired kiln. The burner for the kiln will only burn planer shavings (dried wood waste or biomass) from the planer mill that are stored in the fuel silo. Once the dried timbers leave the kiln, they are processed through the planer mill. The planed timbers are stored in the finished product storage area and sold as a final product.

3.3 Site Security

All visitors are required to check-in at the main office before proceeding inside the facility. The site is guarded at all times when the plant is not operational. Riverside Protection Services, Inc. patrols the plant grounds from 5:00 p.m. to 7:00 a.m. on weekdays and twenty-four (24) hours per day on weekends and holidays. Adequate facility lighting is in place for additional security and safety.

3.4 Site Drainage and Storm Water Outfalls

The site is not located in a flood plain or flood-prone area. The property is designed and graded to route storm water to drainage ditches to the northwest, east, and south where storm water exits at three (3) outfall locations. The property, significant exposed materials, storm water flow directions, and storm water outfall locations are shown in Figure 3, and the outfalls are further detailed below:

Outfall	Drainage Area	Drainage Type & Direction	Receiving Body
SW001	*Roof drainage, employee parking, transformers, and fuel containment area. Storm water that falls on the north and northwest portion of the property.*	All storm water is sheet flow to the north and northwest to an unnamed tributary which flows east to Batupan Bogue Creek.	Unnamed tributary to Batupan Bogue Creek.
SW002	*Dry lumber storage, kiln, roof drainage, sawmill, debarking area, and paved parking area. Storm water that falls on the south, southeast, and southwest portion of the property.*	All storm water is sheet flow to the south, southeast, and southwest to an unnamed tributary which flows south to Batupan Bogue Creek.	Unnamed tributary to Batupan Bogue Creek.
SW003	*Wet deck log storage area and log yard pond. Storm water that falls on the east portion of the property.*	All storm water is sheet flow to the east to the log yard pond. Currently permitted as wet deck log spray discharge.	Unnamed tributary to Batupan Bogue Creek 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		
Wayne Harlow	Purchasing Agent	❑ 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		
Albert B. Hankins Jr.	Manager	❑ Signatory Responsibilities for the SWPPP. ❑ Overall responsibility for the Storm Water Program. ❑ Participates in the annual review to assess SWPPP effectiveness.
Corey Neil Woody Thomas Gary Milhollen Howard Gardner	Safety Manager Safety Supervisor Plant Manager Purchasing Manager	❑ Conducts inspections/sampling and maintains records when team leader is out. ❑ 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	Vehicles in Employee and Visitor Parking	Anti-freeze, Fuel, Grease, and Oil	Spills will be immediately cleaned to prevent possible exposure to storm water.	SW001 SW002
2	Untreated Raw Lumber in Process (Debarker)	Total Suspended Solids (TSS), Oil, Grease, and Fuel	Untreated raw lumber being processed is stored in enclosed buildings as much as possible. Routine inspections and periodic cleaning.	SW002
3	Southern Yellow Pine Logs	TSS	Routine inspections and periodic cleaning of bark.	SW002
4	Wet Deck Log Yard	TSS	Routine inspections and periodic cleaning of bark. Log yard drains to log pond where water is collected and recirculated for wet decking.	SW003
5	Finished Lumber	TSS	Finished lumber is stored in covered and enclosed buildings as much as possible.	SW002
6	Fuel Storage Tanks and Fuel Loading/Unloading Area	Diesel fuel and Gasoline	Fuel storage tanks and loading/unloading areas are under roof with concrete containment. Routine inspections and periodic cleaning of containment area.	SW001
7	Solid Waste Dumpster	TSS, Oil, and Grease	Dumpsters are routinely inspected and removed regularly.	SW001 SW002
8	Scrap Metal	Metals, Oil, and Grease	Conduct routine inspections and collect scrap metal in bins to be recycled.	SW002
9	Wood Chips and Saw Dust Storage	TSS	Conduct routine inspections and use as fuel onsite or ship to customer.	SW002
10	Planer Shavings	TSS	Conduct routine inspections and use as fuel onsite or ship to customer.	SW002

ID No.	Exposed Material	Potential Pollutant(s)	BMPs Implemented [1]	Outfall(s)
11	Transformer	Oil and Grease	Transformers are routinely inspected for leaks or damage.	SW001 SW002
12	Heavy Equipment Used on Site	Oil, Grease, Fuel, and Anti-freeze	Routine inspections and cleaning. Periodic maintenance to reduce fluid leaks.	SW001 SW002
13	Wet Deck Pond	TSS	Routine inspections and periodic cleaning of bark.	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:

- Bulk containers (with exception of the silos) and piping used with raw materials are constructed of compatible materials and are stored inside, under cover;
- Roofing over process, shipping, and material storage areas prevent or minimize 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 will be 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 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 complies with the site-specific Spill Prevention Control and Countermeasure (SPCC) Plan, which includes monthly inspections and secondary containment requirements;
- Drums and containers of fluids are properly labeled and kept clean and closed and within containment 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-dry, 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**

  Unloading areas will be routinely inspected and cleaned of any associated debris or incidental releases. Pans will be provided at the area to use at connection points during unloading. 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 if possible 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, inspections of cooling towers for leaks, and inspections of oil-containing equipment (such as 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. Containers of oil-based products and oil-filled equipment exceeding 55 gallons or more are addressed in the facility's **Spill Prevention, Control, and Countermeasure (SPCC) Plan**. Based on current facility processes and the types and quantities of chemicals stored, there is the potential for a significant spill or release; however, there is containment 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 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 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 that comes in contact with the wet deck storage area flows into the Sedimentation/Retention Pond at the facility. When the pond is discharged, it exits the site at Outfall SW003.

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.

Complete and appropriately signed 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 any appreciable amount stored at the site. Small quantities of WPC may be contained in various materials located throughout the facility (i.e., maintenance shop chemicals, aerosol paints, etc.), but are less than the amount that triggers Toxics Release Inventory (TRI), Form R reporting. The Safety Data Sheets (SDS) of all materials are maintained onsite. In the event that WPCs are brought onsite, this plan will be revised, and the following procedures will be followed.

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	Steel Tank	Tank Farm	36 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. Overhangs or door skirts to enclose trailer ends at loading/unloading docks shall be provided as appropriate. 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.

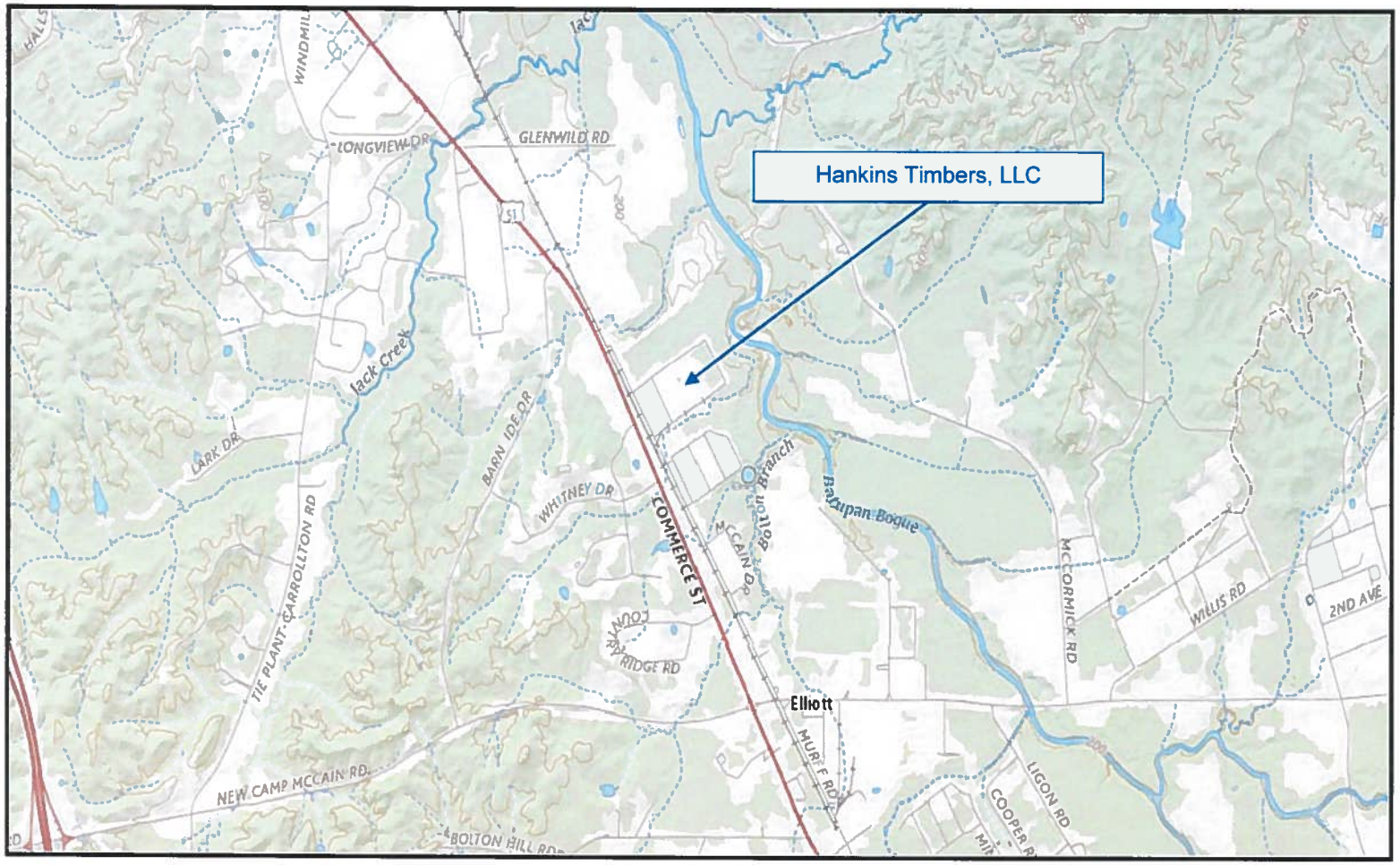
Reporting of Monitoring Results

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
W E
S

Source:
Mytopo.com

Legend:
N/A

Drawn By/Checked By: CRC

Date: 12/02/2020

Hankins Timbers, LLC
228 Murff Drive
Grenada, Mississippi 38901

Figure 1: Site Location Map

ECS
ENVIRONMENTAL COMPLIANCE & SAFETY, INC.
P.O. Box 356
Sherman, Mississippi 38869
(662) 840-5945

FIGURE 2

AERIAL MAP

N
W E
S

Source:
Google Earth (Imagery Date: 12/02/2020)

Legend:
N/A

Drawn By/Checked By: CRC	Date: 12/02/2020

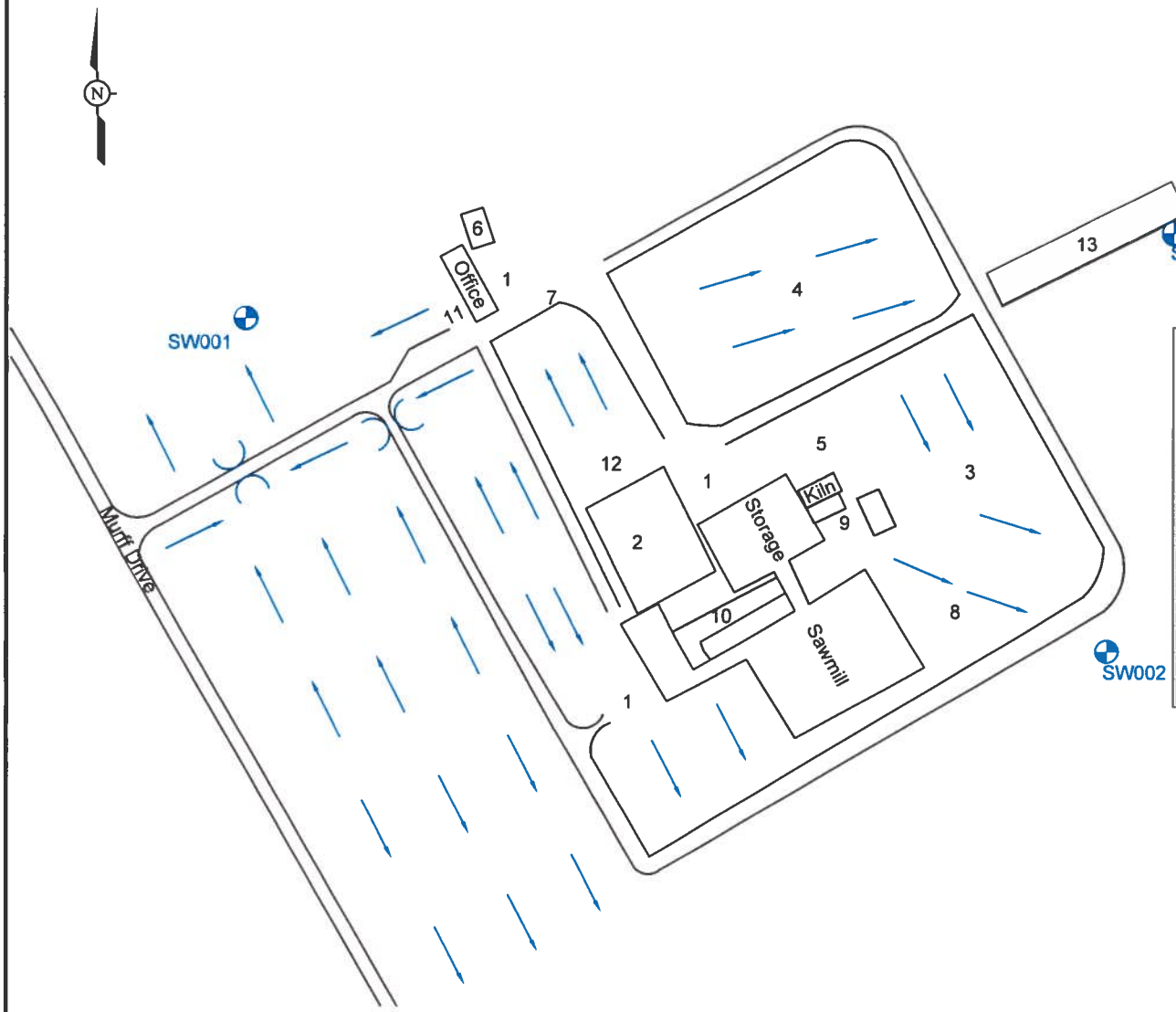
Hankins Timbers, LLC
228 Murff Drive
Grenada, MS 38901

Figure 2: Aerial Map

ECS
ENVIRONMENTAL COMPLIANCE & SAFETY, INC.
P.O. Box 356
Sherman, Mississippi 38869
(662) 840-5945

FIGURE 3

STORM WATER FLOW DIAGRAM



ID No.	Exposed Material
1	Vehicles In Employee And Visitor Parking
2	Debarking Area
3	Southern Yellow Pine Logs
4	Wet Deck Log Yard
5	Finished Lumber
6	Fuel Storage Tanks and Fuel Loading/Unloading Area
7	Solid Waste Dumpster
8	Scrap Metal
9	Wood Chips And Saw Dust Storage
10	Planer Shavings
11	Transformer
12	Heavy Equipment Used Onsite
13	Wet Deck Pond

ECS
ENVIRONMENTAL COMPLIANCE & SAFETY, INC.
P.O. Box 356
Sherman, MS 38869
(662) 840-5945

Hankins Timbers, LLC
228 Murff Drive
Grenada, MS 38901

Storm Water Flow Diagram

Figure 3

Legend:
Storm Water Flow Direction
Outfall Location
Culvert

Scale: NTS
Drawn By: CRC
Date: 12/03/2020

APPENDICES

APPENDIX A

MONTHLY INSPECTION/VISUAL EVALUATION REPORT

BASELINE STORM WATER GENERAL PERMIT
COVERAGE NUMBER (MSR_ _ _ _ _ _)
MONTHLY INSPECTION / VISUAL EVALUATION REPORT
(FOR INDUSTRIAL STORM WATER ACTIVITY)

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

As required by ACT8 of this permit, this inspection / visual evaluation form must be completed on a monthly basis. Completion of this form must be performed by an individual with the knowledge, skills, and training to assess conditions and activities that could impact storm water quality and to evaluate the effectives of best management practices required by this permit. A copy of the completed and signed form shall be maintained on-site with the SWPPP and be available for review by MDEQ personnel upon request.

FACILITY NAME:	**DATE:**
PHYSICAL ADDRESS:	

WEATHER INFORMATION:

- Description of Weather Conditions (e.g., sunny, cloudy, raining, snowing, etc.):

  _____

  _____

- Was the inspection conducted during or immediately after a rain event? ☐ **Yes** ☐ **No** ☐ If yes, conduct a Jar Test at each storm water outfall and attach the results to this form.

I. POTENTIAL POLLUTANT SOURCE, AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION

SWPPP AND SITE MAP:	**Yes**	**No**	**N/A**	**Findings & Remedial Action Documentation**
• Is the Site Map current and accurate?	○	○	○	
• Is the SWPPP inventory of industrial activities, materials and products current?	○	○	○	
VEHICLE/EQUIPMENT AREAS:				
Equipment cleaning:				
• Is equipment washed and / or cleaned using a detergent(s)?	○	○	○	
• If so, is all wash water captured and properly disposed of?	○	○	○	
Equipment fueling:				
• Are all fueling areas free of contaminant buildup and evidence of chronic leaks/spills?	○	○	○	
• Are all chemical liquids, fluids, and petroleum products, stored on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater?	○	○	○	
• Are structures in place to prevent precipitation from accumulating in containment areas?	○	○	○	
• If not, is there any water or other fluids accumulated within the containment area?	○	○	○	

	Yes	No	N/A	Findings & Remedial Action Documentation
Equipment maintenance:				
• Are maintenance tools, equipment and materials stored under shelter, elevated and covered?	○	○	○	
• Are all drums and containers of fluids stored with proper cover and containment?	○	○	○	
• Are exteriors of containers kept outside free of deposits?	○	○	○	
• Are any vehicles and/or equipment leaking fluids? Identify leaking equipment.	○	○	○	
• Is there evidence of leaks or spills since last inspection? Identify and address.	○	○	○	
• Are materials, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)?	○	○	○	
Add any additional site-specific BMPs: _____	○	○	○	
GOOD HOUSEKEEPING BMPS:				
1. Are paved surfaces free of accumulated dust/sediment and debris?	○	○	○	
• Date of last vacuum/sweep _____				
• Are there areas of erosion or sediment/dust sources that discharge to storm drains?	○	○	○	
2. Are there any waste receptacles located outdoors? If yes:	○	○	○	
• In good condition?	○	○	○	
• Not leaking contaminants?	○	○	○	
• Closed when not being accessed?	○	○	○	
• External surfaces and area free of excessive contaminant buildup?	○	○	○	
3. Are the following areas free of accumulated dust/sediment, debris, contaminants, and/or spills/leaks of fluids?				
• External dock areas	○	○	○	
• Pallet, bin, and drum storage areas	○	○	○	
• Maintenance shop(s)	○	○	○	
• Equipment staging areas (loaders, tractors, trailers, forklifts, etc)	○	○	○	
• Around bag-house(s)	○	○	○	
• Around bone yards	○	○	○	
• Other areas of industrial activity: _____	○	○	○	

SPILL RESPONSE AND EQUIPMENT:	Yes	No	N/A	Findings & Remedial Action Documentation
1. Are spill kits available, in the following locations?				
• Fueling stations	○	○	○	
• Transfer and mobile fueling units	○	○	○	
• Vehicle and equipment maintenance areas	○	○	○	
• Process / product formulation areas	○	○	○	
2. Do the spill kits contain all the appropriate necessary items such as:				
• Oil absorbents?	○	○	○	
• A storm drain plug or cover kit?	○	○	○	
• A non-water containment boom?	○	○	○	
• A non-metallic shovel?	○	○	○	
• Other additional items: _____ _____ _____	○	○	○	
3. Are contaminated absorbent materials properly disposed?	○	○	○	
GENERAL MATERIAL STORAGE AREAS:				
• Are damaged materials stored inside a building or another type of storm-resistant shelter?	○	○	○	
• Are all uncontained material piles stored in a manner that minimizes the discharge of impacted storm water?	○	○	○	
• Are scrap metal bins covered?	○	○	○	
• Are outdoor containers covered?	○	○	○	
STORM WATER BMPS AND TREATMENT STRUCTURES: (Visually inspect all storm water BMPs, treatment structures / devices, discharge areas, infiltration, and outfalls shown on the Site Map).				
• Are BMPs and treatment structures in good repair and operational?	○	○	○	
• Are BMPs and treatment structures free from debris buildup that may impair function?	○	○	○	
• Are berms, curbing or other methods used to divert and direct discharges adequate and in good condition?	○	○	○	
OBSERVATION OF STORM WATER DISCHARGES:				
• Is the discharge free of floating materials, visible oil sheen, discoloration, turbidity, odor, foam or any other signs of contamination?	○	○	○	
• Water from washing vehicles or equipment (with detergent), steam cleaning and/or pressure washing is considered process wastewater and is not allowed to comingle with storm water or enter storm drains. Is process water comingling with storm water or entering storm drains?	○	○	○	
• Illicit discharges include domestic wastewater, noncontact cooling water, or process wastewater (including leachate). Were any illicit discharges observed during the inspection?	○	○	○	

MISCELLANEOUS AREAS / ITEMS OF CONCERN: (Evaluations of any matters that are not contained within another section but are covered in the SWPPP [i.e. industrial areas; housekeeping measures; unique BMPs; observations, etc.] should be denoted here.)	Yes	No	N/A	Findings & Remedial Action Documentation

II. CORRECTIVE ACTION AND SWPPP MODIFICATION DESCRIPTIONS: Additional space to describe inspection findings and corrective actions if needed. Provide brief explanation of the general location and the rationale for the additional or different BMPs.

III. CERTIFICATION STATEMENTS AND SIGNATURES:

Inspector - Certification: This section must be completed by the person who conducted the site inspection prior to submitting this form to the person with signature authority or a duly authorized representative of that person.

"I certify that this report is true, accurate, and complete, to the best of my knowledge and belief."

Inspector's Name – Printed	**Inspector's Signature**	**Inspector's Title**	**Date**

APPENDIX B

MONTHLY VISUAL JAR TEST INSPECTION FORM

Monthly Visual Jar Test Inspection Form

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Instructions: As part of inspections conducted during or after storm events, a representative sample of storm water should be collected at each outfall in a clean, clear jar and examined in a well-lit area. Should any of the objectionable characteristics described in the form below be observed, coverage recipient shall investigate upstream from the sample location to identify the potential sources of pollution, implement corrective action, and describe the corrective action in the space provided below. [Baseline General Permit Act8 S-1]

Facility Name:	Physical Address:
Date:	Coverage Number:
Time collected:	Person collecting/examining sample (Print):
Outfall Number/Location sample was collected:	
Was the sample collected during or immediately after a rain event? **Yes or No**	

Parameter	Parameter Description	Description of Sample
Color	Is the water sample colored? **Yes or No**	If yes, describe the color:
Clarity	Is the water sample clear and transparent? **Yes or No**	If no, describe the clarity:
Floating Solids	Are there solids floating at the top of the sample? **Yes or No**	If yes, describe the floating solids:
Settled Solids	Are there solids settled out in the bottom of the sample? **Yes or No**	If yes, describe the settled solids:
Suspended Solids	Are there solids suspended in the water column of the sample? **Yes or No**	If yes, describe the suspended solids:
Foam	Is there foam forming at the top of the sample? **Yes or No**	If yes, describe the foam:
Odor	Does the sample have an odor? **Yes or No**	If yes, describe the odor:
Oil Sheens	Does the sample have an oil sheen? **Yes or No**	If yes, describe the oil sheen:

Detail any concerns noted in the visual jar sample and describe the corrective actions taken:

"I certify under penalty of law that this report is true, accurate, and complete, to the best of my knowledge and belief."

Inspector's Name - Printed	Inspector's Signature	Date

APPENDIX C

MONTHLY SPILL & LEAK LOG SHEET

Facility Name _____

Physical Address _____

Monthly Spill & Leak Log Sheet

Month/Year _____

Coverage Number _____

Instructions: A list of spills and leaks of toxic or hazardous pollutants that have occurred at the facility shall be documented on the Monthly Spill and Leak Log Sheet that is provided in the Baseline Forms Package. A separate form shall be completed for each month that the facility is covered under this general permit. If no spills have occurred, the form shall be completed by checking the available box and signing it as indicated. Coverage recipients may use an alternate form to record this information, so long as it includes all of the information on the above referenced form and it is updated monthly. The completed forms shall be filed on-site with the SWPPP and made available to MDEQ personnel for inspection upon request. [Baseline General Permit ACT5 T-3 (4)]

Date of Spill	Material Spilled	Quantity Spilled (specify units)	Area that Spill Occurred	Did the Spill Result in a Discharge?	Injury / Property Damage?	Person(s) Involved In Clean-up	Date Reported to MDEQ (If significant)
Corrective Action(s) Taken							
Date of Spill	Material Spilled	Quantity Spilled (specify units)	Area that Spill Occurred	Did the Spill Result in a Discharge?	Injury / Property Damage?	Person(s) Involved In Clean-up	Date Reported to MDEQ (If significant)
Corrective Action(s) Taken							
Date of Spill	Material Spilled	Quantity Spilled (specify units)	Area that Spill Occurred	Did the Spill Result in a Discharge?	Injury / Property Damage?	Person(s) Involved In Clean-up	Date Reported to MDEQ (If significant)
Corrective Action(s) Taken							

☐ No spills have occurred this month.	*"I certify under penalty of law that this report is true, accurate, and complete, to the best of my knowledge and belief."*		
	Inspector's Name - Printed	Inspector's Signature	Date

APPENDIX D

EMPLOYEE TRAINING LOG

Employee Training Log

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Instructions: Newly hired employees responsible for implementing and/or complying with the requirements of the permit shall receive initial training prior to performing such responsibilities. Employees shall receive refresher training at a minimum of every twelve (12) months, thereafter. Proper documentation of employee training must be maintained. Include copies of the training agenda and certificates of training when applicable. All training records shall be maintained for at least three years from the date of training. [Baseline General Permit ACT12 S-1]

Facility Name:	Physical Address:
Coverage Number:	Training Date:
Training Topic:	
Training Description:	

Employee Name (printed)	Employee Signature	Worker ID Number	Initial/Refresher

"I certify under penalty of law that this report is true, accurate, and complete, to the best of my knowledge and belief."

Trainer Name (printed)	Trainer Signature	Date

APPENDIX E

ANNUAL SWPPP EVALUATION FORM

BASELINE STORM WATER GENERAL PERMIT
COVERAGE NUMBER (MSR_ _ _ _ _ _)
ANNUAL SWPPP EVALUATION FORM
(FOR INDUSTRIAL STORM WATER ACTIVITY)

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Coverage recipients shall conduct a comprehensive evaluation of the facility's SWPPP by December 31, 2016, and annually thereafter by December 31st of each year. The evaluation shall 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 must be submitted to MDEQ in accordance with ACT7 S-1 (4).

FACILITY NAME:	**EVALUATION DATE:**
PHYSICAL ADDRESS:	

I. DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

INDUSTRIAL ACTIVITIES	**Yes**	**No**	**Findings & Remedial Action Documentation**
• Does the SWPPP have a list of Industrial Activities exposed to storm water?	○	○	
• Has the facility added any Industrial Activities that are exposed to storm water since the previous Annual SWPPP Evaluation?	○	○	
MATERIALS AND POLLUTANTS			
• Does the SWPPP have a list of materials and pollutants exposed to storm water?	○	○	
• Does the SWPPP have a narrative description of the materials and pollultants?	○	○	
• If so, does the narrative contain the following information?			
o Method of storage and disposal.	○	○	
o Management practices employed to minimize contact with storm water.	○	○	
o Structural and non-structural control measures to reduce pollutants in storm runoff.	○	○	
o Any treatment the storm water receives.	○	○	
SPILLS AND LEAKS			
• Does the SWPPP contain a monthly updated list of spills and leaks?	○	○	
• Does the SWPPP contain an updated summary of all storm water samplaing data including a description of associated pollutants?	○	○	

I. DESCRIPTION OF POTENTIAL POLLUTANT SOURCES (CONTINUED)			
SITE MAP	**Yes**	**No**	**Findings & Remedial Action Documentation**
• Does the SWPPP have a site map showing the property layout with site boundaries?	○	○	
• If so, does the site map indicate the following features?			
o Surface water bodies.	○	○	
o Drainage area of each storm outfall by number.	○	○	
o Direction of flow for each drainage area.	○	○	
o Location and description of existing structural and non-structural control measures to reduce the pollutants in storm runoff.	○	○	
o Location of any storm water treatment activities.	○	○	
o Location of any storm drain inlets.	○	○	
o Location of industrial activities, such as: a) Fuel storage and dispensing locations. b) Vehicle/equipment repair, maintenance, and cleaning areas. c) Materials storage and handling areas. d) Loading/unloading areas. e) Process or manufacturing areas.	○	○	
o Location of housekeeping practices.	○	○	
o Storm water conveyances (ditches, pipes, & swales).	○	○	
II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS			
POLLUTION PREVENTION MANAGER/COMMITTEE			
• Does the SWPPP specify individual(s) responsible for developing the SWPPP and assisting the facility manager in its implementation, maintenance, and revision?	○	○	
• If so, have there been any changes in the personnel listed since the previous Annual SWPPP Evaluation?	○	○	
RISK IDENTIFICATION AND MATERIAL INVENTORY			
• Does the SWPPP assess the pollution potential of various sources at the facility including loading and unloading operations; outdoor storage, manufacturing or processing activities; significant dust or particulate generating processes and on-site disposal practices?	○	○	
• If so, have there been any changes in operations or sources of potential pollutants since the previous Annual SWPPP Evaluation.?	○	○	

II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS (CONTINUED)			
SEDIMENT AND EROSION PREVENTION	**Yes**	**No**	**Findings & Remedial Action Documentation**
• Does the SWPPP identify areas with a high potential for soil erosion, and specify prevention measures to limit erosion?	○	○	
• If so, have there been any changes to the facility which would increase the potential for soil erosion since the previous Annual SWPPP Evaluation?	○	○	
PREVENTIVE MAINTENANCE			
• Does the SWPPP contain a preventive maintenance program to insure the inspection and maintenance of storm water management devices?	○	○	
• If so, does the program specify protocol for inspecting and testing of equipment to preclude breakdowns or failures that may cause pollution?	○	○	
GOOD HOUSEKEEPING			
• Does the SWPPP describe and list practices appropriate to prevent pollutants from entering storm water from industrial activities due to poor housekeeping?	○	○	
• If so, do the practices describe or list the following:			
o Designated areas for equipment maintenance and repair.	○	○	
o Provisions for waste receptacles at convenient locations.	○	○	
o Provisions for regular collection of waste.	○	○	
o Adequately maintained sanitary facilities.	○	○	
o Secondary containment around any on-site fuel or chemical container with a capacity greater than 660 gallons or any combination of containers which have an aboveground storage capacity of more than 1,320 gallons.	○	○	
o Secondary containment for raw material stockpiles.	○	○	
SPILL PREVENTION AND RESPONSE PROCEDURES			
• Does the SWPPP identify potential spill areas and their drainage points?	○	○	
• Does the SWPPP specify material handling procedures and storage requirements?	○	○	
• Does the SWPPP have procedures for cleaning up spills?	○	○	
• Have there been any changes at the facility in potential spill areas and/or their drainage points since the previous Annual SWPPP Evaluation?	○	○	
EMPLOYEE TRAINING			
• Does the SWPPP specify periodic training for personnel that are responsible for implementing and/or complying with the requirements of the SWPPP? (see ACT12)	○	○	

II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS (CONTINUED)			
ILLICIT CONNECTIONS EVALUATION AND CERTIFICATION	**Yes**	**No**	**Findings & Remedial Action Documentation**
• Does the SWPPP contain an illicit connection certification?	○	○	
• If so, was the certification evaluation and certification completed within the last 5 years?	○	○	
• Does the certification include the following?: o Method of evaluation, date(s), observation point(s), and result(s).	○	○	
ROUTINE VISUAL SITE INSPECTIONS			
• Does the SWPPP describe the policy and procedures for routine visual inspections, including frequencies and areas to be inspected?	○	○	
• Does the SWPPP inspection policy describe procedures for collecting storm water if the inspection is conducted during or after a storm event?	○	○	
• If so, does the SWPPP inspection policy outline procedures consistent with the requirements of ACT8 S-1 to investigate, correct, and document instances in which visible pollutants are observed?	○	○	
STORM WATER MANAGEMENT			
• Does the SWPPP provide for the management of storm water volume through its diversion, infiltration, storage or re-use?	○	○	
III. NON-STORM WATER DISCHARGE MANAGEMENT			
NON-STORM WATER MANAGEMENT			
• Does the SWPPP identify any allowable non-storm water discharges identified in ACT2 T-3?	○	○	
• Does the SWPPP identify and ensure the implementation of appropriate Best Management Practices (BMPs) for the non-storm water component of any discharge?	○	○	
• Have there been any changes or additions to the allowable non-storm water discharges since the previous Annual SWPPP Evaluation?	○	○	
IV. FACILITY CHANGES			
SWPPP AMENDMENT			
• Has there been a change in design, construction, operation, or maintenance, which may increase the discharge of pollutants to waters of the State or has the SWPPP been ineffective in controlling storm water pollutants? **If so, amend the SWPPP and submit it to the MDEQ within 30 days of amendment. (ACT7 S-1 (4))**	○	○	

V. MONTHLY INSPECTION SUMMARY (Previous 12 months)

DATE (mm/dd/yy)	TIME	ANY DEFICIENCIES?		IF YES, WERE CORRECTIVE ACTIONS TAKEN?		INSPECTOR(S)
		YES	NO	YES	NO	

SWPPP EVALUATION CERTIFICATION STATEMENT AND SIGNATURE:

SWPPP Evaluation and Certification: This section must be completed by the person who conducted the SWPPP evaluation prior to submitting this form to the person with signature authority or a duly authorized representative.

"I certify that this report is true, accurate, and complete to the best of my knowledge and belief."

Name-Printed	**Signature**	**Title**	**Date**

RO/DAR CERTIFICATION AND SIGNATURE

Permittee-Certification:

☐ The SWPPP is in compliance with the terms and conditions of the Baseline Industrial Storm Water General Permit.

☐ The SWPPP is out of compliance with the terms and conditions of the Baseline Industrial Storm Water General Permit. The SWPPP will be amended and submitted to MDEQ within 30 days of amendment.

"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 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."

Printed Name of person with Signature Authority or a Duly Authorized Representative[1]	**Signature of person with Signature Authority or a Duly Authorized Representative[1]**	**Date**

[1]A person is a Duly Authorized Representative only if 1) the authorization is made in writing and submitted to the permit board by a person described in ACT 14 T-9 [*"Signatory Requirements"*], and 2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated activity, such as: manager, operator of a well or well field, superintendent, person of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company.

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	10/30/2020	Visual Inspection	N/A	No	N/A	Catlin Golding (ECS) Casey Creaden (ECS)
SW002	10/30/2020	Visual Inspection	N/A	No	N/A	Catlin Golding (ECS) Casey Creaden (ECS)
SW003	10/30/2020	Visual Inspection	N/A	No	N/A	Catlin Golding (ECS) Casey Creaden (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.
Albert B. Hankins, Jr. Manager	(662) 809-3380
C. Signature	**D. Date Signed**
Albert B Hankins Jr	12/10/20

[1] Allowable non-storm water discharges addressed in an individual NPDES permit are not included in this evaluation.

APPENDIX G

BASELINE STORM WATER GENERAL PERMIT