

AI: 86349

MSR002533



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Mississippi Department of Environmental Quality

INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

FOR COVERAGE UNDER THE INDUSTRIAL STORMWATER
GENERAL NPDES PERMIT MSR00 2533
(NUMBER TO BE ASSIGNED BY STATE)

INSTRUCTIONS

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

Submittals with this ISNOI must include a Storm Water Pollution Prevention Plan (SWPPP) with the minimum components found in ACTs 5-8 of the Industrial Stormwater General Permit. In addition, a United States Geological Survey (USGS) quadrangle map (or a copy) showing site location and extending at least 1/2 mile beyond the site's property boundary is required. If a copy is submitted, provide the name of the quadrangle map that is found in the upper right hand corner. Maps can be obtained from the MDEQ, Office of Geology at 601-961-5523.

ALL FORM BLANKS MUST BE COMPLETED (enter "NA" if not applicable)

THE APPLICANT IS: OWNER OPERATOR (PLEASE CHECK ONE OR BOTH)

OWNER INFORMATION

Owner Contact Name: Carl Smith Position: Site Manager

Owner Company Name: Brainerd Chemical Southeast, LLC

Owner Street (P.O. Box): 50 Midland Road

Owner City: Scooba State: MS Zip: 39358

Owner Phone Number: (662)-883-8322 Owner Email: csmith@brainerdchemical.com

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: _____ Position: _____

Operator Company Name: _____

Operator Street (P.O. Box): _____

Operator City: _____ State: _____ Zip: _____

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

O.C

FACILITY INFORMATION

Facility Name: Brainerd Chemical Southeast LLC

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

SIC Code: 5169 Chemicals and Allied Products NEC

Receiving Stream: Bodka 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: 50 Midland Road City: Scooba

County: Kemper Zip: 39358

Latitude: 32 degrees 47 minutes 23.2 seconds Longitude: 88 degrees 27 minutes 32.0 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.

None.

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.

Sulfuric Acid

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):

How will sanitary sewage be collected and treated? Municipal sewer system

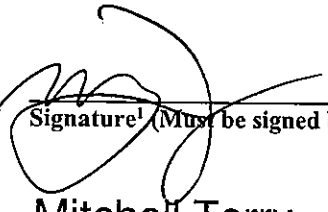
Indicate any local storm water ordinance with which the facility must comply and submit any documentation of approval.

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

If yes, please describe: _____

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


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

Mitchell Terry
Printed Name¹

April 15, 2024

Date Signed

Director of Health, Safety, and Environmental

Title

¹This application shall be signed according to the General Permit, ACT 16, T-9, as follows:

- For a corporation, by a responsible corporate officer.
- For a partnership, by a general partner.
- For a sole proprietorship, by the proprietor.
- For a municipal, state or other public facility, by principal executive officer, the mayor, or ranking elected official.

After signing please mail to:

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



ENCO ENVIRONMENTAL CO., INC.

"THE Environmental Authority"

PO Box 1352
Sand Springs, OK 74063

Phone: (918) 398-9436

E-mail: jmdunn@tulsaeenvironmentalconsultant.com

FAX: (918) 703-4733



BRAINERD CHEMICAL COMPANY STORMWATER POLLUTION PREVENTION PLAN

Adopted by:

Prepared By:

John M. Dunn, PE
ENCO Environmental Co., Inc.
PO Box 1352
Sand Springs, OK 74063
(918) 398-9436

April 15, 2024

Preface

ENCO Environmental Co., Inc. was retained by Brainerd Chemical Co., Inc. ("Brainerd") to update the Stormwater Pollution Prevention Plan (SWP3) for its facility located in Scooba, Mississippi. The SWP3 was updated according to the Mississippi Department of Environmental Quality General Permit MSR00 for stormwater discharges from industrial facilities under the multi-sector industrial general permit which became effective December 10, 2020. The site location is depicted on the site vicinity map provided in Section 1. A site plan that depicts the on-site drainage and discharge conveyances has been provided in Section 1. In accordance with the General Permit program requirements, a Stormwater Pollution Prevention Plan has been developed to identify the industrial activities associated with this site that could adversely impact stormwater discharges from the facility and to describe control practices that will be performed to improve stormwater quality prior to discharge.

This SWP3 provides the following information: designates the pollution prevention team; current facility information; potential pollutant sources; existing and planned management practices to improve the quality of stormwater runoff leaving the site; a table for comparing analytical results; and a regulatory compliance summary outlining Brainerd's annual reporting and monitoring responsibilities.

Brainerd is primarily engaged in chemical transportation and is therefore largely exempt from these regulations due to the primary SIC code of 5169. However, the facility also engaged in blending and repackaging, and therefore comes under the Mississippi Stormwater Regulations because of its secondary SIC code of 2869. The facility is governed by Acts 2 and 8 of the General Permit.

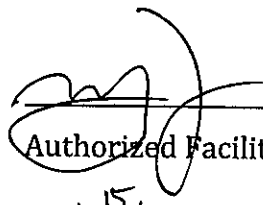
It should be noted that this SWP3 has been completed in accordance with the Industrial Stormwater General Permit (ISGP) requirements outlined in Mississippi Administrative Code Part 6, Chapter 1.

A copy of the General Permit has been copied to CD and can be located in Tab 2 of this plan. Additionally, the permit may be viewed on the internet at MDEQ's website.

Non-Stormwater Discharge Assessment and Certification

In accordance with the General Permit regulations, I have performed a non-stormwater discharge assessment. All outfalls were visually inspected to identify the presence of non-stormwater discharges. The purpose of this inspection was to reveal other discharge sources that could adversely impact the quality of stormwater discharged from the facility and verify that the outfall #1 receives only stormwater. I certify that no illicit discharges or any nonexempt discharges including discharges into the storm sewer system such as water from non-contact cooling water, mop sinks, floor drains, etc. have occurred. This certification should be kept with the SWP3 for the duration of the permit term. I understand that allowable non-stormwater discharges include the following:

- Fire hydrant flushings;
- Potable water including drinking fountain water and waterline flushings;
- Uncontaminated air conditioning or compressor condensate;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer are applied in accordance with manufacturer's instructions;
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed);
- Routine external building wash down that does not use detergents;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials such as solvents;
- Incidental windblown mist from the cooling tower 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); and
- Discharges or flow from emergency fire fighting activities will be allowed, if measures are taken to reduce any such pollutant releases to avoid or minimize the impacts on water quality and to ensure public health and safety.



Authorized Facility Representative

4/15/24
Date

Certification of SWP3

I certify under penalty of law that I have read and understand the requirement for this Stormwater Pollution Prevention Plan. 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.



Authorized Facility Representative

4/15/24

Date

There are five sections of this plan. In the Site Assessment and BMP section, a discussion of what pollutants are present at the facility, as well as the general status of the facility and steps will be outlined to prevent the contamination of stormwater by these chemicals. The second section will discuss the members of the pollution prevention team, their individual roles and responsibilities. The third section will discuss the implementation of the plan and the training to the employees in general. The fourth section will contain the records of annual site compliance evaluations, as well as any relevant record keeping, and internal reporting (including spills, clean-ups, etc.). The fifth section will allow for plan revisions. This plan also contains Appendix A, which contains blank forms which are to be used to record data pursuant to the terms of the permit. The remaining Appendixes are to be used to store completed forms and demonstrate compliance.

EMERGENCY TELEPHONE NUMBERS AND CONTACTS

This information is provided for quick reference in the event of a discharge.

- **If there is a fire or other imminent threat call 911**
- **Determine the source of the discharge**
- **Call the following:**

Facility Information

Emergency Contact: Carl Smith	Work Phone: (662) 883-8322
Title: Site Manager	24-Hour Phone: (601) 937-8171
Secondary Contact: Garrett Woodson	Work Phone (405) 362-2000
Title: Regional Manager	24-HourPhone: (405) 208-1124

- **After reporting the discharge to the appropriate personnel, efforts shall be made to contain the discharge and prevent the product from reaching drainage structures.**

The Operations Manager will make the following calls if the release is of a reportable quantity or if outside assistance is deemed necessary:

USEPA National Response Center:	(800) 424-8802
State Spill Hotline:	(800) 222-6362
Local Spill Hotline:	911

Type of Manufacturer: Chemical Distributor
Individual NPDES # MSR00

Section 1: Site Assessment / BMP Selection

Site Assessment

The facility is located at 50 Midland Road in Scooba, Mississippi and occupies approximately 6.75 acres. The facility is composed of a single building that houses the office and warehouse. There is also a concrete pad located near the rail spur, equipped with a secondary containment unit which contains two bulk storage tanks. The northern third of the property is covered in concrete. The remainder of the facility is covered in native grasses. There is a roadway that travels around the perimeter of the property, to permit vehicles ingress and egress to the back part of the facility. There is a rail spur that runs along the west side of the facility. The facility has one outfall which is located along the rail spur on the west side of the facility. Water will flow to the south, therefore the outfall is located in the southwest corner of the property.

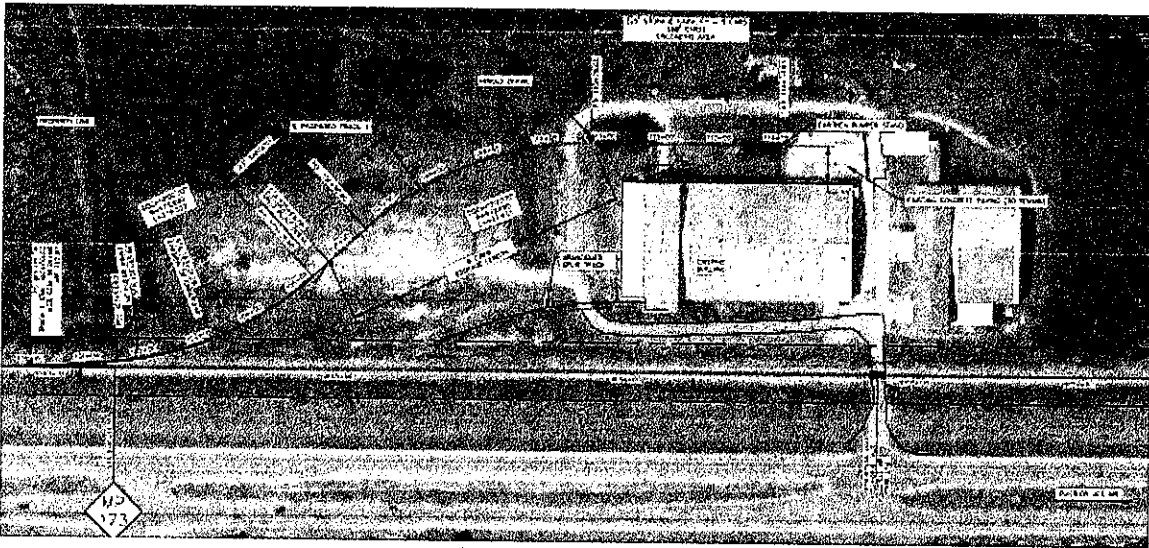


Photo 1: Facility Layout

Potential Pollutant Sources

In accordance with the regulatory requirements, industrial operations which have the potential to adversely affect the quality of stormwater discharged through discrete conveyances from the site must be addressed using appropriate measures and controls to limit the impact of the operations on the quality of stormwater. In addition, other areas and operations which could degrade stormwater quality, but which are not discharged through regulated conveyances, also warrant management considerations to improve stormwater runoff

The property houses both solids and liquids that comprise several different classes of products, including acids, oxidizers, and bases. Some of these chemicals are simply repackaged for commercial sale while others are reacted to form new products or diluted to form concentrations for commercial sale.

Some products arrive in bulk, either by railcar or tanker truck. Those products are offloaded from the tanker or railcar to bulk storage in the facility through a series of flexible piping and solid pipe to bulk storage. This product transfer presents the potential for stormwater contamination through drips as the result of potential leaks from fittings or joints in the line. In order to prevent this type of contamination, the facility places buckets under the joints during the loading and unloading process. When lines are not in use, they are stored with their ends connected to prevent product spill or contamination of the soil.

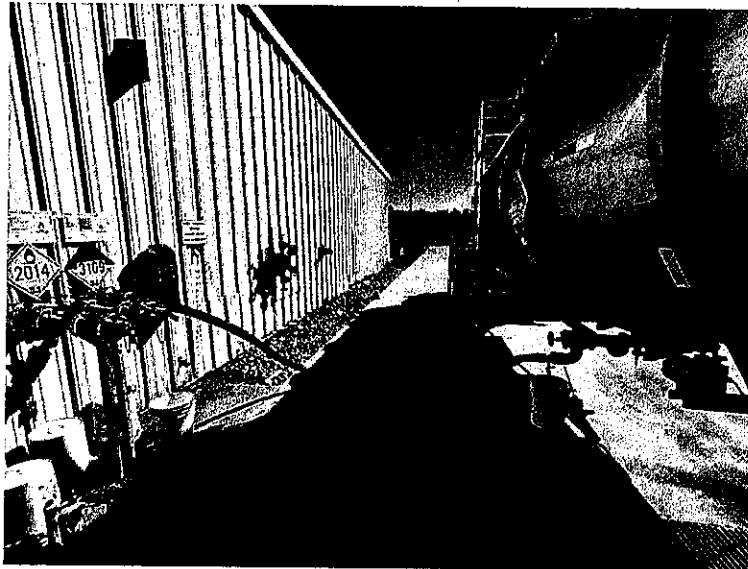


Photo 2: Product being Unloaded from Tanker Truck

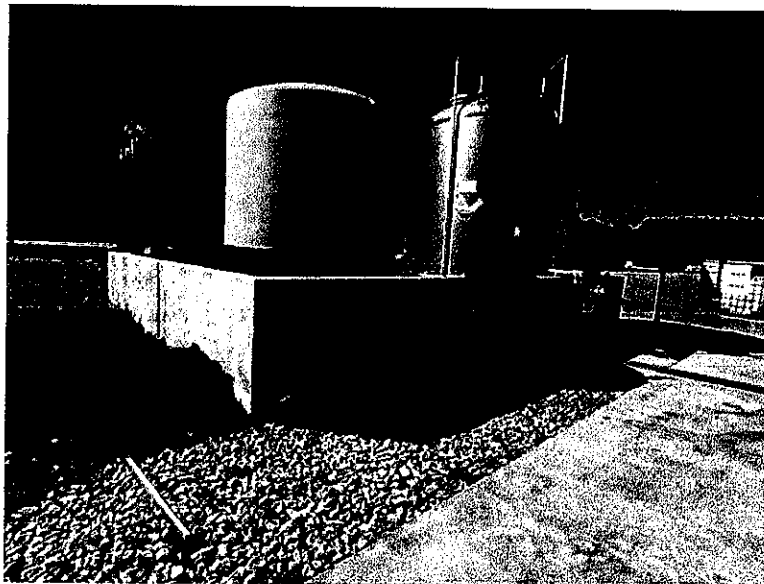


Photo 3: Hydrogen Peroxide Bulk Storage

There is only one outdoor storage area located near the rail spur. That bulk storage unit houses two bulk tanks – specifically hydrogen peroxide and acetic acid. These bulk tanks

are surrounded with secondary containment. No secondary containment unit contains bulk storage for incompatible materials. The secondary containment unit has a drain which would permit the drainage of stormwater from the unit. The drains are closed when not in use.



Photo 4: Stormwater Drain from Secondary Containment

Products that arrive in bulk that are not transferred to the outdoor storage tanks are transferred to bulk storage tanks located in the warehouse. In addition, there are products manufactured at the facility that are loaded into bulk tankers. This loading and unloading takes place through an onsite loading rack.

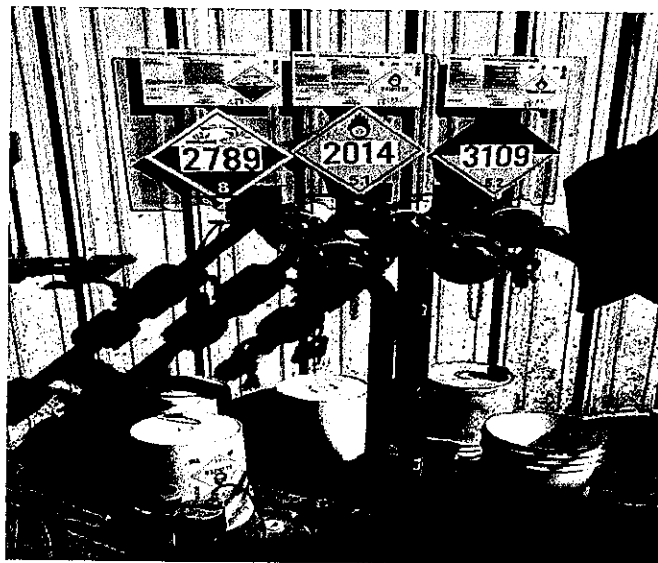


Photo 5: Loading rack for inside bulk storage

Other products arrive at the facility by truck in totes or drums. Other products are shipped out after being packaged in totes or drums. These totes are transported using

fork trucks. When the product arrives at the facility, the truck pulls next to the loading dock. A fork truck picks up the containers from the truck and transport them into the warehouse for storage or to the receiving vehicle for transport.

The facility uses fork trucks to move products around and to load and unload drums and totes from trucks. These fork trucks present the risk of hydrocarbon contamination if they drip oil or hydraulic fluid. These drips can pose a risk of contamination to the stormwater.

The facility creates waste through its various operations. Non-hazardous waste or other refuse is placed in trash dumpsters for removal. These dumpsters are water-tight and are equipped with lids that are kept closed to prevent rainwater from entering.

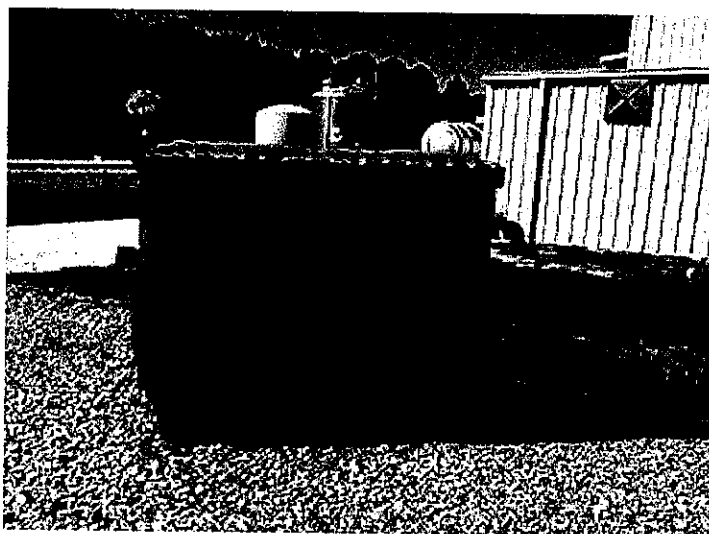


Photo 6: Trash dumpster and recycle bin

The final concern is the potential for “floatable debris” – commonly referred to as litter. This contaminate can have its source in one of several places. It could blow out of a trash bin. The debris could be the remnants of a crushed pallet or an improperly discarded piece of packing material. Finally, the debris could simply be trash that has been discarded by an employee returning from lunch or break. This contamination is unsightly and is easily dealt with by proper housekeeping measures.

Chemicals at the Facility

The attached chemicals are expected to be present at the facility and the manner in which they are handled and stored.

- Hydrogen peroxide – 50% in tanker truck offloaded to stainless steel tank by rail spur – sometimes cut down to lesser percent and prepared for sale. This process takes place inside the warehouse.
- Acetic acid – stored in rail car until it is needed. It is then offloaded to tanks inside building. It is exclusively used in the production of Peracetic Acid onsite.

- Sulfuric Acid – Arrives in totes, offloaded from truck using fork-truck and brought inside.
- Sodium Carbonate – This product is produced onsite by mixing Soda Ash and Water. It is used in another product.
- Sodium Bisulfate – Arrives in totes offloaded from truck using fork-truck and brought inside. This product is used to make another product known as “Sulfolox”.
- Ferrous Chloride – Arrives on a tanker truck. It is then offloaded to totes inside door Northwest corner of the warehouse.
- Diphenylamine (Powder) - Arrives at the facility on pallets and is offloaded using fork-trucks. It is used on site as a reactant to manufacture Peracetic Acid.
- Dequest – Arrives in totes, offloaded from truck using fork-truck and brought inside. This product is used on site as a reactant to manufacture Peracetic Acid.
- Peracetic acid – This chemical is created as a product on sight through reacting other chemicals listed above to create this product. It is then transferred from the reactor to tanker truck or totes for sale.

Section 313 Chemicals

Of the chemicals listed above, the only chemical in inventory that is a 313 chemical that may require reporting is Sulfuric Acid. That chemical arrives at the facility in a closed and sealed tote, which is off-loaded from the truck by fork truck and transferred inside of the warehouse. These totes are constructed of compatible materials and are stored in the warehouse, which will act as secondary containment for a tote. The totes will be inspected prior to offloading to ensure that they are not leaking. If the truck is going to be offloaded outside, drains and trenches will be covered or curbed to prevent a spill from entering the stormwater collection system. Additionally, a spill kit station will be located in the area where offloading and transportation occurs. The facility will be locked and secured when not in operation. All gates will be closed and locked.

Mississippi Sensitive Waters and Watersheds

It has been indicated on the NOI that the facility is not located in Federal or State sensitive waters or watersheds. Stormwater from this facility will flow to Bodka Creek, which is not an impaired water body described in 303(d) of the regulations.

Historic Properties

A search has been made of the immediate area. There has been no “historic” property located that would be impacted from stormwater discharge from the facility.

Permit Eligibility Related to TMDL

A total maximum daily load (TMDL) has not been established for the Bodka Creek.

Regulatory Compliance Summary

The facility has not had any violations or spills in the past three years.

Additional Requirements Imposed by State Permit

There are no additional requirements imposed by the General Permit on this facility

Applicable Local Plans

This plan is consistent and updated as necessary with applicable municipal, local stormwater, waste disposal, sanitary sewer and septic system regulations.

Summary of Previous Stormwater Sampling

This is the first time the facility has applied for a stormwater permit, having become operational in the past year. Therefore, there is no previous history of stormwater monitoring.

BMP Selection

As a general guideline the facility has a low potential for spills and stormwater contamination. To these ends, each of the above-described areas will be discussed, along with the practices that are to be used to further prevent contamination of stormwater. This low potential is primarily because the majority of the repackaging and blending operations are contained within buildings. Any small spills from those operations will be contained by the warehouse and therefore would not pose a credible risk of stormwater contamination.



Photo 7: Stormwater trench and drain

Stormwater that falls at the facility is controlled and guided through a series of ditches and drains, which guides the water to the outfall, which is located along the new railspur in the southwest portion of the property. These drains can be isolated in the event of a spill in order to prevent contamination. By ushering the stormwater to an underground drain, Brainerd has further reduced the chances of stormwater contamination.

In order to prevent product loss and contamination from the transfer of product from bulk storage, tankers, and railcars, the facility will use drip buckets or drip pans under each of the connections. Further, following the transfer process, the lines will be blinded or capped and stored in a manner to prevent the contents from draining onto the ground.

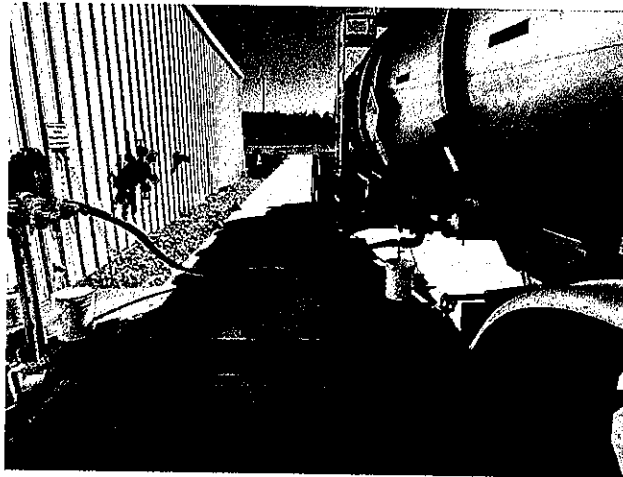


Photo 8: Drip buckets under transfer line

The secondary containment units can be a source of spill prevention, but if not properly maintained, they can be a source of stormwater contamination. Secondary containment units must be maintained with the drains closed. The inside of the unit must be kept free from debris and chemical contaminants. Following a storm event, the water should be inspected and pH tested to insure it is free from contaminants and the test results will be recorded, prior to the drain being opened and the water being released. The drain should

be closed immediately following the release of the stormwater.

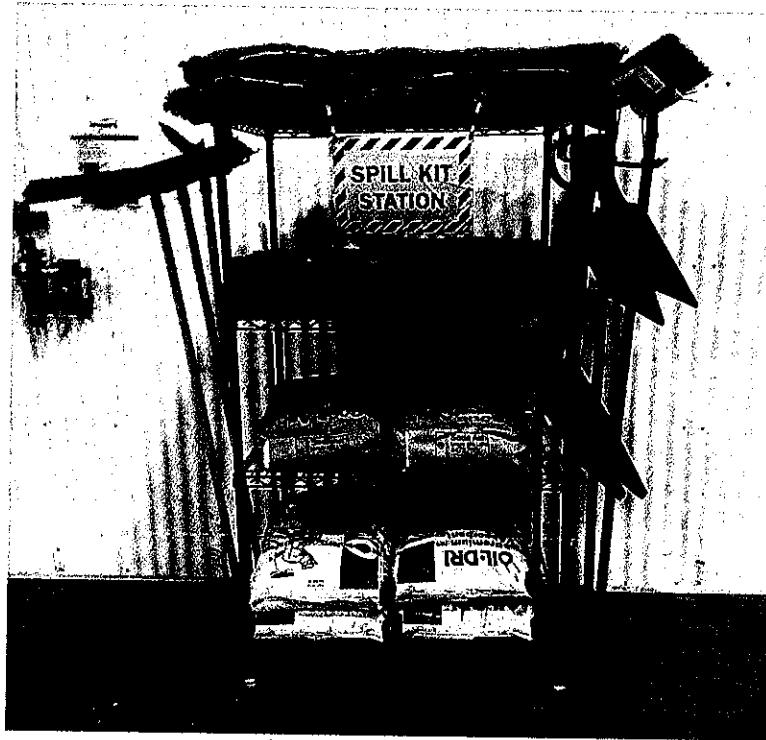


Photo 9: Spill Kit Station

In order to counter any spills that might occur, the facility maintains spill kit stations in the various locations throughout the facility. These stations are equipped with absorbent material (oil dry), soda ash, spill containment materials, squeegees, spark proof shovels, brooms, and other materials that are anticipated to be required to clean up spills.

All vehicles that enter the facility will be inspected to verify that it is not leaking oil, fuel, or other liquids that could contaminate storm water. Fork trucks will be inspected on a monthly basis to ensure that there are no leaks. Fork trucks will be stored under cover at any time that they are not in use. All vehicle maintenance will be performed under cover or inside.

The trash dumpsters will only contain solid, non-hazardous waste. The dumpsters will remain closed when not being used to minimize the amount of stormwater that might be reasonably expected to enter. All packaging materials will be placed in the appropriate container as soon as they are discarded.

Each week, a visual inspection of each of these areas will be conducted. Any spills or contamination that is observed will be immediately reported to management and cleaned up using appropriate measures.

Documentation of Stormwater Control Measure Maintenance

Documentation of stormwater control measure maintenance will be maintained in Appendix E of the SWP3. A stormwater control measure maintenance document has been provided as Appendix A. Example stormwater control measure maintenance procedures include:

- Cleaning storm inlets;
- Cleaning property drains.
- Cleaning stormwater outlets
- Cleaning outdoor storage areas (pads)
- Verifying the readiness of overpacks and spill kits
- Checking the secondary containment units for debris or contamination
- Verify that drains from the secondary containment units are closed
- Verify totes are properly stored (both those containing product and empty)

Documentation of the Inspection and Testing of Facility Equipment

Brainerd will routinely inspect equipment on-site including incoming trailers and vehicles. If any equipment is noted to be leaking during routine visual inspections, that equipment will be repaired immediately. Significant leaks or repairs will be documented. Please refer to *Spill Response Procedures* for additional detail on reportable spills.

Documentation of Monthly Stormwater Inspections

Carl Smith shall conduct monthly periodic inspections to determine the effectiveness of the good housekeeping measures, spill prevention and response measures, erosion control measures, maintenance program for structural controls, best management practices, and the employee training program. The inspection must also identify any existing BMPs that are not being properly or completely implemented.

These inspections must be documented through the use of a checklist that is developed to include each of the controls, measures, and areas that are evaluated. When revisions or additions to the SWP3 are recommended as a result of inspections, a summary description of these proposed changes must be attached to the inspection checklist. The summary must identify any necessary time frames required to implement the proposed changes. A monthly inspection checklist is included in Appendix A and the results of these inspections should be maintained in Appendix E.

Corrective Action

When any of the following conditions occur or are detected during an inspection, monitoring or other means, or MDEQ or EPA or the operator of the MS4 through which the facility discharges informs the facility that any of the following conditions have occurred, this plan must be reviewed and revised (e.g., sources of pollution; spill and

leak procedures; non-stormwater discharges; the selection, design, installation and implementation of your control measures) so that the condition is eliminated and pollutant discharges are minimized:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another Individual NPDES permit) occurs at the facility;
- A discharge violates a numeric effluent limit;
- The control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this Permit;
- A required control measure was never installed, was installed incorrectly, or not in accordance with the General Permit, or is not being properly operated or maintained; and
- Whenever a routine inspection, visual monitoring or comprehensive site evaluation shows evidence of stormwater pollution.

If any of the following conditions occur, the facility will review this plan (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation and implementation of your control measures) to determine if modifications are necessary to meet the effluent limits in the General Permit:

- Construction or a change in design, operation, or maintenance at your facility that significantly changes the nature of pollutants discharged in stormwater from your facility, or significantly increases the quantity of pollutants discharged; or
- If the results of quarterly visual samples indicate that what you have observed would lead a reasonable person to believe that the stormwater was polluted.

Corrective Actions and Deadlines

If corrective action is needed, ***all reasonable steps*** necessary to *minimize* or *prevent* the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events must be ***immediately*** taken.

*Note: In this context, the term **immediately** requires you to, on the same day a condition requiring corrective action is found, take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action, the initiation of corrective action must begin no later than the following work day.*

Subsequent Actions

If it is determined that additional actions are necessary beyond those implemented immediately upon discovery of the condition, corrective actions must be completed (*e.g., install a new or modified control and make it operational, complete the repair*) before the next storm event if possible, and within **14 calendar days** from the time of discovery of the corrective action condition. Where the corrective actions result in changes to any of the controls or procedures documented in this plan, the plan will be modified accordingly within **14 calendar days** of completing corrective action work. This time interval is not a grace period, but is considered reasonable for documenting findings and for making repairs and improvements. This requirement is included in this plan to ensure that the conditions prompting the need for these repairs and improvements do not persist indefinitely.

Corrective Action Report

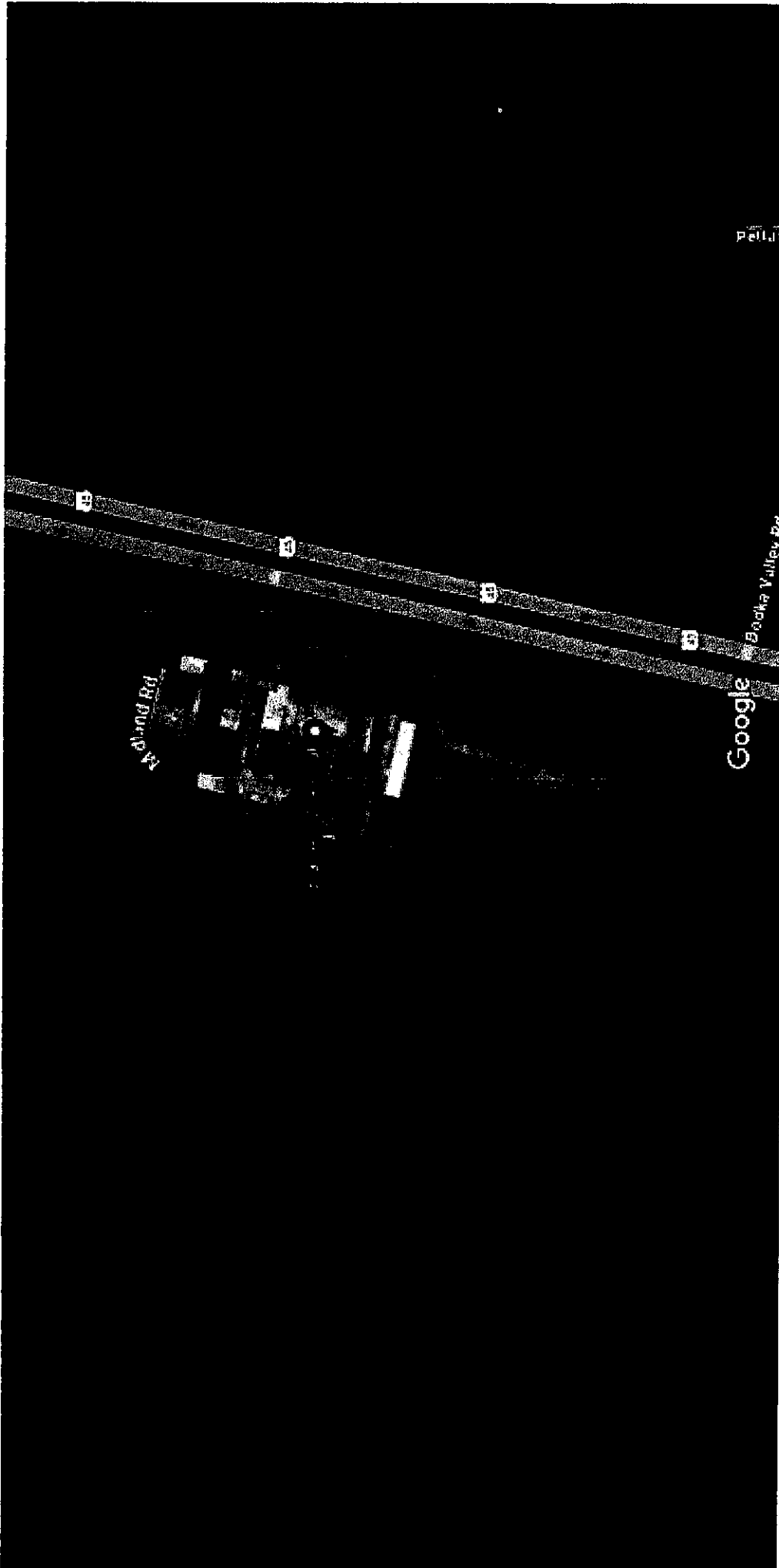
The existence of any of the conditions triggering a corrective action as discussed above must be documented within **24 hours** of becoming aware of such condition. A corrective action report must be prepared and certified and contain the following information:

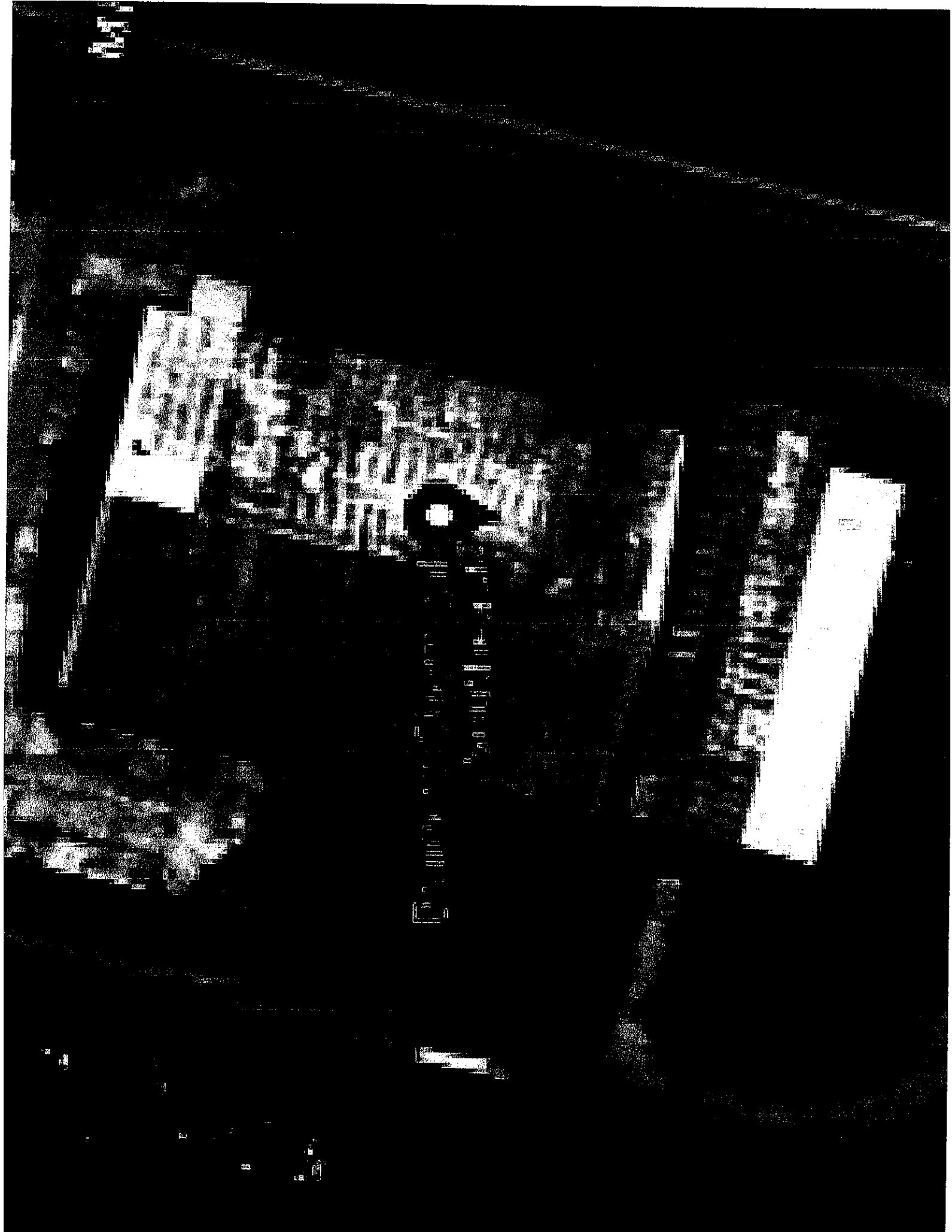
- Description of the condition triggering the need for corrective action review. For any spills or leaks, include the following information: a description of the incident including material, date/time, amount, location, and reason for spill, and any leaks, spills or other releases that resulted in discharges of pollutants to waters of the State, through stormwater or otherwise;
- Date the condition was identified;
- Description of immediate actions taken to *minimize* or *prevent* the discharge of pollutants. For any spills or leaks, include response actions, the date/time clean-up was completed, notifications made, and staff involved. Also include any measures taken to prevent the recurrence of such releases; and

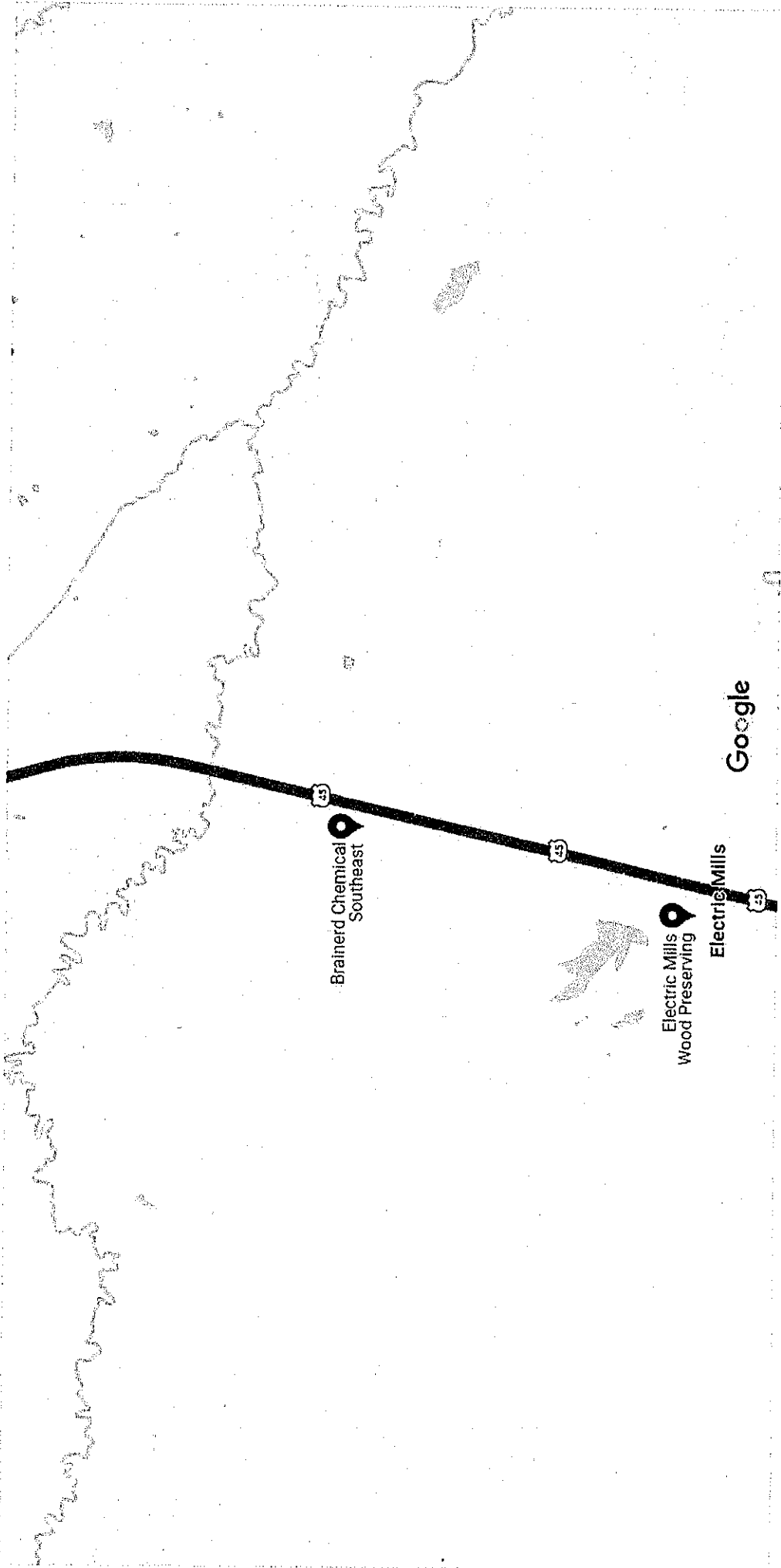
Within **14 days** from the time of discovery of any of those conditions listed above, the following information must be documented:

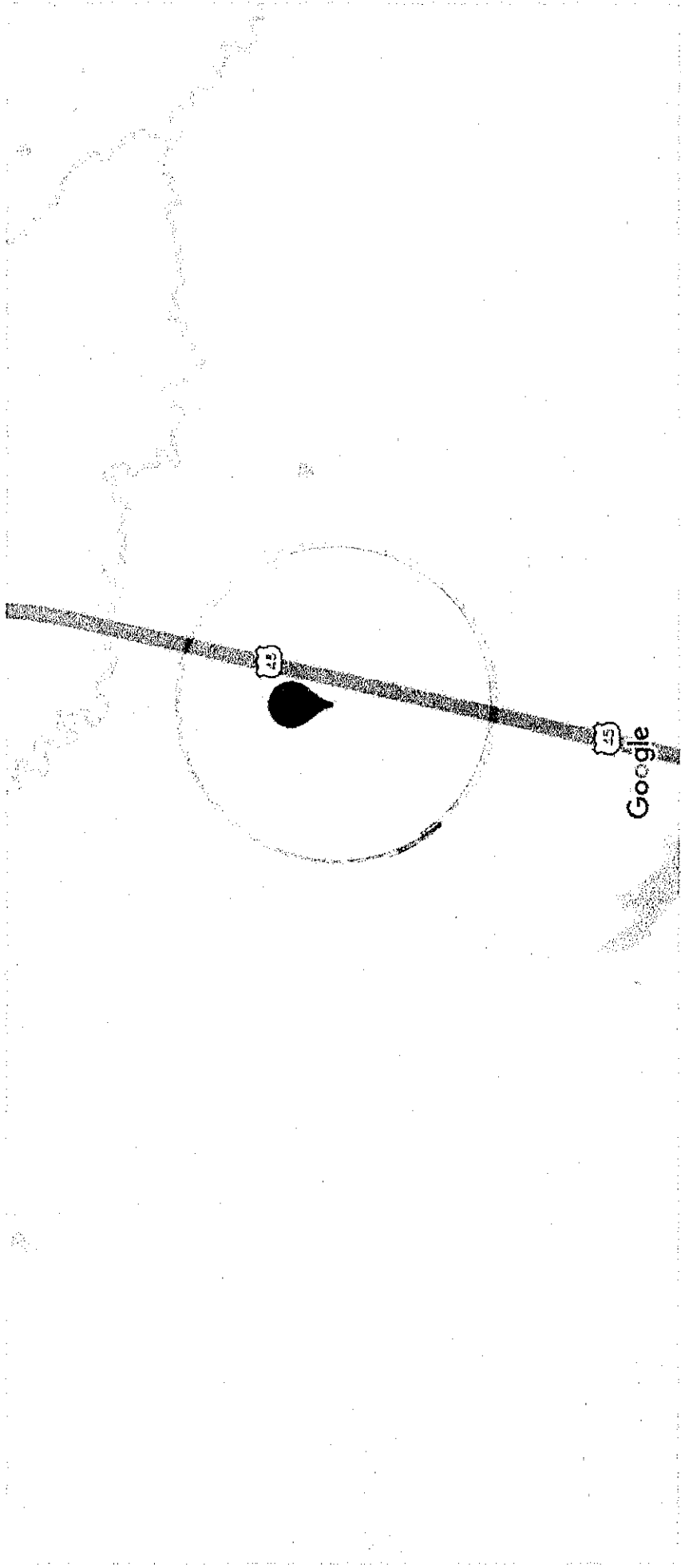
- Summary of corrective actions taken or to be taken as a result of the conditions listed above (or, for triggering events where it is determined that corrective action is not necessary, the basis for this determination);
- Dates and times when each corrective action was initiated and completed;
- Notice of whether SWP3 modifications are required as a result of this discovery or corrective action; and
- A statement signed and certified in accordance with the General Permit.

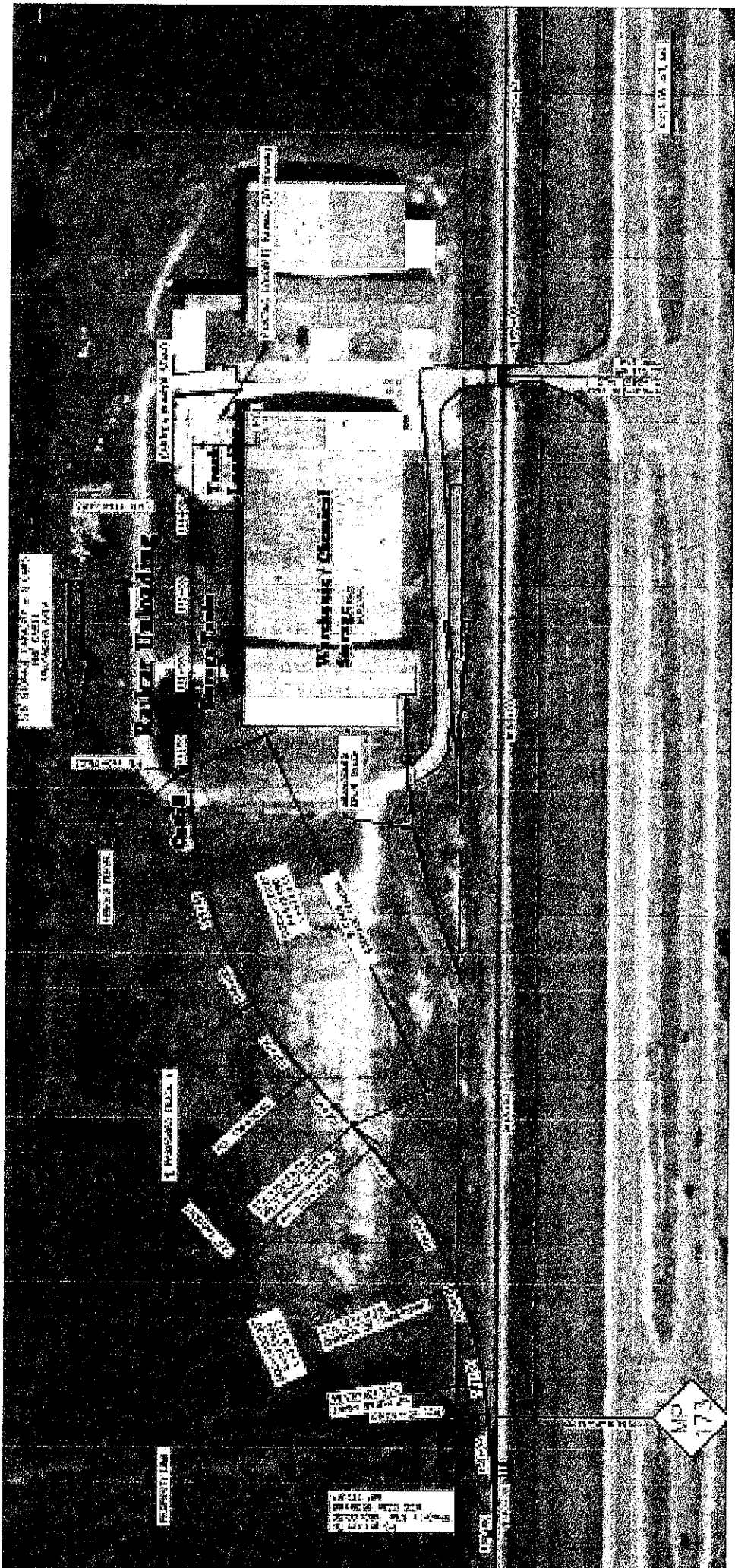
It is not necessary to submit the corrective action report to DEQ, unless specifically requested to do so. However, the findings of the report must be summarized in the Annual SWPPP Evaluation Form and a copy of the corrective action report must be kept with this plan.











Section 2: Pollution Prevention Team

Chris Smith will be the Team Leader. His responsibilities will include but not be limited to the following:

1. He will be the contact person for questions from the authorities.
2. He will be the signatory authority
3. He will coordinate all stages of plan development and implementation
4. He will coordinate a training program.
5. He will keep all records.
6. He will ensure that all required reports are submitted.
7. He will determine the source, character, amount, and extent of the release or incident.
8. He will assess the potential hazards to the site, environment, and neighboring community due to the incident, including possible toxic gases, hazardous runoff, etc.
9. He will contact outside remediation services or local emergency response teams to assist with incident or injuries too serious to be addressed by site personnel.
10. He will contact Local Emergency Planning Committees (LEPC) and neighboring industries, if necessary, for assistance or to report off site releases.
11. He will document the remedial effort, including taking photographs if possible.
12. He will generate any required follow-up incident reports.

It should be noted that the team leader's role is not limited to only those tasks listed above, and that he is allowed to further delegate to other team members that may be added by subsequent amendments or updates to this plan.

Todd Null is the secondary team member.

1. He will conduct the daily visual inspections.
2. He will note process changes and advise the team leader as appropriate.
3. He will oversee good housekeeping.
4. He will sound the site alarm and/or evacuation command to alert employees, when required.
5. He will commit manpower and equipment for minor incidents that can be reasonably corrected by the site personnel.
6. He will direct remediation efforts to contain and control the release in accordance to this plan.
7. He will coordinate cleaning and disposal activities, including recovering usable products from the release.
8. He will ensure that all emergency equipment used during the incident is clean and fit for use prior to placing these devices back into service. Replace spent equipment where necessary.

In addition, an independent auditor will conduct a yearly audit. This auditor will be required to provide a written report of his findings and recommendations. Those findings and recommendations will be kept in the Appendix E of this book. During that time, the Annual SWPPP Evaluation Form, found in the appendix, will be also completed. A copy of the completed form will be kept in the appendix of this plan.

All employees are subject to becoming part of the team in the event of emergency. The roles and responsibilities of these employees are subject to the following conditions and their responsibilities are as follows:

Actions taken by location employees during an emergency response will be limited to those that pose no threat to their personal safety. The employee will not take any action that might be hazardous due to the nature of the release without one of the team leaders' approval and appropriate personal protective equipment (PPE).

The employee's response will vary upon the extent and nature of the incident. Small fires, minor leaks and spills (which might develop into larger environmental incidents if left un-addressed) will be remediated immediately without a formal emergency response. For larger incidents requiring outside assistance, the employee's duties will be restricted to:

1. Limiting the magnitude of the incident (i.e., closing valves, placing adsorbent

pads around spill) if possible.

2. Contacting one of the team leaders. Remaining near the incident if not in imminent danger and providing immediate oversight until one of the team leaders arrive.
3. Preventing the release from entering nearby surface waters or drainage ducts, if possible.
4. Providing security for the release area to insure that other employees do not unknowingly enter this area.
5. Sounding the alarm to nearby workers who could potentially be affected by the incident.

Section 3: Implementation / Employee Training

Implementation

The team leaders will review the progress of this plan every (30) thirty days until all of the procedures described have been implemented. Any problem areas will be reviewed and modified as required. Following implementation, the team leaders will continue to oversee training and operation of the plan.

The facility will immediately begin training the employees on both preventative measures and pollution control measures as described below. Additionally, the employees will be reviewed annually on the use of personal protective equipment and the hazards of materials located at the facility, as prescribed in OSHA's HAZCOM standard.

Employee Training

The first line of any emergency response involves prevention. As part of the routine inspections, site employees will attempt to identify potential problems before they develop into fires and/or environmental incidents. It is the employee's duty to examine each storage facility for bulging or leaking drums, tank or piping leaks, deterioration of containment dikes, stains, spills, etc. It is also the employee's responsibility to correct these problems wherever possible and communicate with the team leaders the extent of these problems.

Should a spill or release be evident, the employee first detecting this condition will immediately adhere to the procedures outlined in this plan. If these spills occur in the employee's work area; he/she will immediately report the incident to management and attempt to contain the spill to the smallest possible area.

In order to keep the employee safe; Brainerd Chemical Southeast, LLC will implement a training schedule that results in annual training. This training, at a minimum, will include familiarizing employees with the emergency response procedures as outlined in this plan. This training shall be given to the employee within six months of his/her date of hire and annually thereafter by a trained and qualified instructor. In addition, this training is necessary whenever this plan or the employee duties change. This training will be given initially, when plan is developed, or if the plan is changed. No personnel shall handle any hazardous waste/material releases until this training is completed. At a minimum, the in-house training program will include reviewing this plan as it pertains to the following topics:

1. Hazardous waste and material management procedures;
2. Identification of potential hazards in the work place;

3. Applicable pollution control laws and regulations;
4. Emergency Response and Contingency Plan;
5. Emergency response procedures and reporting;
6. Emergency response notification and communications;
7. Site evacuation plan and routes; and
8. Proper use of personal protective equipment.

Employee training records will be maintained at the facility for a minimum of three (3) years from the date that coverage under this permit expires.

Training logs and dates will be included with Appendix D of this plan.

Schedule and Content

Brainerd will have a training program to inform employees about the SWP3 and will continue to train annually on this plan. Employee training will be documented by maintaining an employee-training roster. Training will address each component of the SWP3 and includes:

- Informing personnel directly involved with the supervision of on-site operations that are exposed to stormwater, or could impact stormwater runoff, of the components and goals of this SWP3. Properly trained personnel are more capable of preventing spills, responding safely and effectively to an incident should one occur, and recognizing situations that could lead to stormwater contamination;
- Outline the potential sources of stormwater contamination;
- Outline site specific steps that must be taken to prevent stormwater contamination;
- Inform the employees of spill kit locations and proper procedures for containing, cleaning, and disposing of a spill;
- Ensure that the basic principles of stormwater pollution management are understood; and,
- Address each component of the SWP3, including how and why tasks are to be implemented. Topics should include spill prevention, good housekeeping, visual inspections, preventive maintenance practices, and material management practices.

- Specific training concerning 313 chemicals. This training will include preventative measures that specifically prevent these chemicals from being exposed to stormwater or released to the environment.

Reporting a Spill

Spills include any unintentional loss of contaminate to the environment. Generally, at Brainerd, they will take the form of oil drip from outside equipment. These spills are not reportable, but they are unsightly and should be cleaned up and properly disposed of when discovered to minimize the risk of stormwater contamination.

Each day, a visual inspection of each of these areas will be conducted. On an annual basis, an outside consultant will visit the facility and conduct a thorough environmental inspection. Any spills or contamination that is observed will be immediately cleaned up using an absorbing media and broom.

Should a large spill occur (and the chemical spilled is regulated by Section 304 of SARA), the head of Pollution Prevention Team will contact the following agencies:

- 1) Call the National Response Center at (800) 424-8802
- 2) Call 911 to alert the local Fire Department
- 3) Call the State Emergency Response Committee at (800) 222-6362

If the spill is not of a chemical that is regulated by Section 304, the LEPC and Local Fire Department will be contacted and actions will be taken to contain the spill. After the spill has been contained and cleaned, Brainerd will submit a spill report to the MDEQ if it is deemed necessary by the Pollution Prevention Team Leader. The report will include a description of the materials released, an estimate of the volume of the release, the location of the release, and a description of any remediation or cleanup measures taken. In the event of a non-reportable spill, the spill response incident form must be completed for internal documentation. In addition to submitting the spill report and filling out the spill response incident form, the SWP3 will be updated with a description of the release, circumstances leading to the release, and the date of the release.

A reportable quantity discharge is defined as a release of a hazardous substance, hazardous waste, or oil within a 24-hour period of time, which exceeds the reportable quantity level assigned to that substance under the CERCLA or the Clean Water Act.

The following are the Reportable Quantities (RQ) for discharges of oil in the State of Mississippi:

- **For discharges of petroleum (oil) to waters, the RQ is any amount that causes a sheen upon the surface of the water.**

- **The RQ for other chemicals on site are contained in the printout at the end of this section.**

For releases of oil to the environment within the facility boundary, excluding navigable waters, the RQ is 1,000 gallons.

Fire

Should a fire occur, an employee should not attempt to extinguish the fire unless it is in the incipient stage and can be extinguished with a portable extinguisher by an employee trained in its use. Once the evacuation alarm is given, all employees should retreat to the designated areas.

Clean-Up Procedures

Techniques used to clean up and contain spills shall conform to the training received. The primary purposes of any action taken when responding to a spill are:

1. Restrict the spill to the smallest possible area. Block off or close all area drains;
2. Avoid contaminating facility drains and ditches;
3. Use sandbags, adsorbents, and fill dirt to construct temporary containment structures where necessary.

Flammable Spills

1. Small spills and leaks should be remediated as soon as feasible. Use adsorbent material wherever possible to reduce the amount of contaminated articles.
2. Immediately construct additional containment using sandbags or fill material. Never allow the hydrocarbon to seep into soils or drains.
3. After all recoverable hydrocarbon has been collected and drummed, place contaminated soils and articles in containers.
4. If a release occurs into a facility drain or nearby stream, immediately pump any floating layer into drums. For high velocity streams, place oil booms or hay bales between the release area and the plant boundary. As soon as possible, excavate contaminated soils and sediments.
5. For larger quantity of soils, construct temporary waste piles using plastic liners and wood settings.

6. Dispose of oily soils and contaminated articles in accordance with applicable State regulations.
7. Decontaminate all equipment before storing.

In addition to these activities, surface water out falls located at the site property boundary will be visually inspected for oily or contaminated discharges. Flow at locations that appear affected by the release shall be impeded:

1. With sandbags, adsorbent pads, or hay bales as necessary to prohibit the migration of contaminants off site.
2. With temporary earthen berms to impede large quantities of affected water.

Acid Spill

1. Small spills and leaks should be remediated as soon as feasible. Neutralize acid with a weak base and clean up contaminated area.
2. Immediately construct additional containment using sandbags or other non-reactive material. It is necessary to prevent the spill from entering ditches or drains.
3. After all acid has been neutralized, place contaminated soils and articles in containers.
5. For larger quantity of soils, construct temporary waste piles using plastic liners and wood settings.
6. Dispose of contaminated soils or articles in accordance with applicable State regulations.
7. Decontaminate all equipment before storing.

Base Spill

1. Small spills and leaks should be remediated as soon as feasible. Neutralize base with a weak acid and clean up contaminated area.
2. Immediately construct additional containment using sandbags or other non-reactive material. It is necessary to prevent the spill from entering ditches or drains.

3. After all base has been neutralized, place contaminated soils and articles in containers.
5. For larger quantity of soils, construct temporary waste piles using plastic liners and wood settings.
6. Dispose of contaminated soils or articles in accordance with applicable State regulations.
7. Decontaminate all equipment before storing.

Solid Materials Spills

There is a risk of direct contamination of stormwater from solid materials present at the facility. Many of these solid materials are not hazardous nor are they water reactive or water-soluble. Most of the solids that may be discharged are expected to form a cement type mixture when it comes in contact with water. Should a spill of solid materials occur, the following procedure will be followed:

1. If the spill is inside the facility, it will be immediately cleaned up using a broom and dust pan.
2. If the spill has occurred outside, the area should be thoroughly cleaned by hand to ensure that no solid particles are left in the area.
3. Monitor down stream of any discharge for the presence of solids.
4. Reroute run off. Try to hold the runoff water on site while the separation occurs.
5. Any solids recovered will be repackaged and disposed of as waste.

In addition to these activities, surface water out-falls located at the site property boundary will be visually inspected for oily or contaminated discharges. Flow at locations that appear affected by the release shall be impeded:

1. With sandbags, adsorbent pads, or hay bales as necessary to prohibit the migration of contaminants off site.
2. With temporary earthen berms to impede large quantities of affected water.

Section 4: Annual Site Compliance Evaluation / Record Keeping and Internal Reporting

Annual SWPPP Evaluation Form

On an annual basis, a site evaluation will be conducted jointly by Carl Smith and an independent environmental auditor. This audit will include a review of the property and the chemical inventory. This audit will focus on the following areas:

- Secondary containment areas
- Outdoor storage areas
- Product loading and unloading areas
- General review of the yard

The findings of this audit will be included in a written report that will be maintained in Appendix E of this plan. The annual comprehensive site compliance evaluation report will also be completed during this time. The original will be mailed to the Mississippi Department of Environmental Quality prior to March 1 of each year. A copy will be maintained in Appendix C.



Photo 10: Stormwater Outfall

Quarterly Monitoring

All facilities are required to engage in quarterly visual monitoring. (Q1 – Jan 1 to March 31, Q2 – April 1 to June 30, Q3 – July 1 to September 30, Q4 – October 1 to December 31.) To complete this monitoring requirement, the facility is required to obtain a sample from each outfall once per quarter. The person collecting the sample is required to be “Qualified Personnel”. “Qualified Personnel” are personnel who are knowledgeable in the principles of industrial stormwater controls and pollution prevention, who possesses

the education and ability to assess conditions at the industrial facility that could impact stormwater quality, and the education and ability to assess the stormwater quality, and the education and ability to assess the effectiveness of stormwater controls selected and installed to meet the requirement of this permit. Todd Null should retrieve this sample each time. This will ensure uniformity in reporting observations made of the sample. If no storm event resulted in runoff from the facility during the quarter, the facility is excused from monitoring for that quarter, but it is necessary to record that no recordable event occurred. The sample must be taken in accordance with the following procedures:

1. The sample must be taken during daylight hours (e.g. normal working hours)
2. The sample must be collected within the first thirty minutes of when the runoff or snow melt begins. (Should safety concerns not permit collection within the first thirty minutes, the sample may be taken within the first hour.)
3. The examination will document observations if color, odor, clarity, floating solids, settling solids, suspended solids, foam, oil sheen, or other indicators of stormwater pollution. (The attached chart has a place to record each of these observations.)
4. The examination must be conducted in a well lighted area.
5. The sample can only be collected from discharge resulting from a storm event that that is greater than 0.1 inches, which occurs more than 72 hours from the preciously measurable rain fall event.

Numeric Effluent Limitation Sampling

Under the General Permit requirements, based on Brainerd's SIC code, Numeric Effluent Limitation Monitoring (NELM) is not required for this facility.

Illicit Connections, Evaluation and Certification

Every five years, the Team Leader will certify that stormwater discharges have been evaluated for the presence of non-allowable discharges. The certification shall include the method(s) of evaluation, date(s), observation points, and results. This facility should used the observations made during facility inspections, annual reviews, and storm water sampling to form the basis of this certification. This certification shall be maintained with this plan and made available to MDEQ personnel on request.

Record Keeping and Internal Reporting

All records will be maintained in the appropriate appendix of this plan. Appendix A will contain blank forms that will be use to record data that is required by regulation and this

plan. The completed forms will be maintained in the appropriate appendix of this plan. Additionally, the appendix of the book should also contain sections for copies of all record keeping, sampling, and incident reports that involve the release of chemical to the environment regardless of the size of the spill.

Section 5: Plan Revisions

Amendments to the plan may be initiated by either Carl Smith at Brainerd Chemical Southeast, LLC or the EPA Regional Administrator (or authorized State Agency). This plan shall be reviewed and revised on an annual basis, or as needed, by the Site Manager or designated representative. Changes may be made to the plan by removing inaccuracies and writing in the revised and corrected information. In addition the plan will be revised:

1. Whenever a change has occurred in facility design due to construction, operations or maintenance that materially affects the potential for an oil spill or increases the potential for fire, explosion, or release of hazardous substances, or modifies the response necessary during an emergency.
2. When required by the EPA after review or when applicable regulations change.
3. When the list of emergency coordinators or emergency equipment changes.
4. If the Plan fails during an emergency.
5. An event that triggers a "Corrective Action" as outlined in Section 1 of this plan occurs.

Brainerd Chemical Southeast, LLC will submit the Plan to the EPA Regional Administrator whenever one of the following occurs:

1. Discharges of more than 1,000 gallons of oil into navigable waters in a single spill event;
2. Discharge of oil in harmful quantities as defined by 40 CFR § 110 into navigable waters during two reportable spill events in a twelve-month period. A harmful quantity is defined as: (1) an oil spill which causes a film or sheen upon or discoloration of the surface of the water or adjoining shore lines or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shore lines, or (2) violates applicable water quality standards; or
3. When requested to do so by the US EPA.

Any information made available to the EPA will also be sent to the Water Division of the Mississippi Department of Environmental Quality.

Annual Review

This plan must be reviewed at least annually and modified if:

1. There is any construction or change in design, operation, or maintenance at the facility that changes the nature of the pollutants discharged in stormwater

from the facility, or significantly increases the quantity of pollutants discharged;

2. The control measures selected are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in the Mississippi General Permit
3. A required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained; or
4. Whenever a routine inspection, visual monitoring or comprehensive site evaluation shows evidence of stormwater pollution.

After conducting the annual review of this plan, the site maps of the facility must be updated to show any changes that have occurred in the past calendar year. All modifications must be signed and dated by the same authorized individual that signed this plan.