AI: 87799

MSR002552

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Rec'd via hard copy: 11/19/2024

INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

FOR COVERAGE UNDER THE INDUSTRIAL STORMWATER GENERAL NPDES PERMIT MSR00 2552 __ __

(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: Alicia Hickman **Position:** Owner

Owner Company Name: All South Scrap Processors

Owner Street (P.O. Box): 1904 US 49

Owner City: Wiggins **State:** MS **Zip:** 39577

Owner Phone Number: (228-348-2158 **Owner Email:** Allsouthscrap@outlook.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: All South Scrap Processors

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

SIC Code: 5093 Scrap Metal Recycling

Receiving Stream: UT of Red 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: 1904 US 49 **City:** Wiggins

County: Stone County **Zip:** 39577

Latitude: 30 degrees 48 minutes 51 seconds **Longitude:** 89 degrees 08 minutes 5 seconds

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

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):

How will sanitary sewage be collected and treated? On site septic system

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

NA

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.

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

11-11-24
Date Signed

Alicia Hickman
Printed Name[1]

President
Title

[1]**This 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

Coastal Environmental Solutions, Inc.

Environmental and Safety Services

November 4, 2024

Sent via Certified Mail
#9589 0710 5270 0134 4526 59
11/13/2024

RECEIVED
NOV 19 2024
Dept. of Environmental Quality

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

RE: Industrial Stormwater Notice of Intent
All South Scrap Processors, LLC
1904 US 49
Wiggins, Stone County, MS

Dear Chief, Environmental Permits Division,

Please find enclosed a signed Industrial Stormwater Notice of Intent form, along with a copy of the Stormwater Pollution Prevention Plan, associated drawing and inspection forms. If you have any questions, please contact Mike Vanden Bergh at 850-598-0084.

Sincerely,

Ben Reeves

PO Box 580
11728 US Hwy 231
Wetumpka, AL 36092

Mike Vanden Bergh: 850-598-0084
Ben Reeves: 334-391-3273

STORM WATER POLLUTION PREVENTION PLAN
and
SPILL PREVENTION CONTROL and COUNTERMEASURES PLAN

All South Scrap Processors
1904 US 49
Wiggins, Stone County, MS

Prepared For:
All South Scrap Processors
1904 US 49
Wiggins, MS 39577
228-392-6070

Prepared by:
Coastal Environmental Solutions, Inc.
PO Box 580
Wetumpka, AL 36092

Date: October 29, 2024

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Section 1 Introduction

1.1 Introduction

This *Storm Water Pollution Prevention Plan* (Plan) was developed to provide a comprehensive, integrated approach for environmental management and compliance at the All South Scrap Processors facility located in Wiggins, Stone County, Mississippi (hereinafter referred to as the "facility"). Reference Figure 1 for general site location. Topics covered in this Plan include procedures and systems to protect storm water run-off from exposure to potential contaminants. The Plan also includes response procedures for a number of possible events such as oil spills, chemical spills or releases of hazardous material or waste, which will be hereby referred to as *significant materials*. This plan is formatted to include a Spill Prevention Control and Countermeasures (SPCC) Plan requirements. The SPCC threshold is not currently exceeded, but in the future if they are this plan can be updated to meet those requirements.

This Plan combines All South Scrap Processors standard operating procedures with those requirements imposed under Mississippi and Federal law relating to storm water pollution prevention. This Plan is intended to meet the requirements of the Mississippi Department of Environmental Quality and the requirements for coverage under the State's General National Pollutant Discharge Elimination System (NPDES) Permit. All South Scrap Processors requested d coverage under the State's general permit. The State should issue coverage under their Permit. A requirement to maintain coverage under the permit is for the facility to develop and implement a storm water best management practices plan. Facilities that store oil products in excess of 1,320 gallons are required to develop a SPCC. SPCC plans are required under the Oil Pollution Prevention Act for facilities that store over the threshold quantity. The requirements are set forth in 40 CFR Part 112. Table 1.1 cross-references the requirements of 40 CFR Part 112 with the sections of this Plan. Sections related specially to SPCC requirements will be listed as reserved in case the facility decides to add additional storage capacity at which time this plan can be modified to meet the SPCC requirements.

1.2 Plan Overview

The program outlined in this Plan emphasizes pollution prevention and, particularly implementation of "Best Management Practices" (BMPs). BMPs, as suggested by the United States Environmental Protection Agency (USEPA), include preventive maintenance, spill prevention, good housekeeping, training, material management, segregation of areas of concern, recycling, and treatment/disposal of waste.

As outlined herein, this Plan is divided into sections containing site-specific information and policy. A periodic review of this Plan, in addition to employee training, will give facility

personnel greater awareness of their responsibilities and help identify potential areas of concern and/or non-compliance.

It is expected that facility procedures will continue to be refined and enhanced as appropriate. Any minor day-to-day revisions in plant procedures and practices will be addressed in All South Scrap Processors' standard operating procedures (SOP). Revised SOPs and incidental changes to such supporting documents will be maintained at the facility and will be available upon request from the manager. Should substantial changes be made, such changes will be incorporated into an amended Plan. As required, any amendments will be certified by the company EH&S officer and the Plan will be reissued as appropriate.

TABLE 1.1
Cross Reference Table 40 CFR Part 112 vs SWPPP
All South Scrap Processors
Wiggins, MS

40 CFR Part 112 Section	Description	Plan Section
112.3(d)	PE Certification	1.3
112.3(e)	Plan Location	2.2
112.4(a)	Plan Amendment – Spills	2.3
112.5(a)	Plan Amendment – Facility Changes	2.3
112.5(b)	Review of Plan Every 5 Years	2.3
112.7	Management Approval	1.4
112.7(a)(1)	Conformance with Requirements	1.1
112.7(a)(3)	Facility Description/Layout	3.2, Figures 1 and 2
112.7(a)(3)(i)	Container Contents	4.2
112.7(a)(3)(ii)	Discharge Prevention Measures	5.1, 6.2
112.7(a)(3)(iii)	Discharge Controls (Secondary Containment)	4.2
112.7(a)(3)(iv)	Countermeasures for Discharge Discovery, Response and Cleanup	4.2.2, 4.3.2, 7.1
112.7(a)(3)(v)	Methods of Waste Disposal	7.3, 11
112.7(a)(3)(vi)	Contact List	7.0, Appendix D
112.7(a)(4)	Reporting Procedures and Information to be Reported	7.0, 7.4, 9.4

112.7(b)	Prediction of Rate of Flow, Direction, and Total Quantity of Oil	
112.7(c)	Secondary Containment	4.2
112.7(e)	Inspections, Tests, and Reports	10.2.1
112.7(f)(1)	Personnel Training and Discharge Prevention	10.1
112.7(f)(2)	Designation of Facility Representative for Discharge Prevention	7.0
112.7(f)(3)	Annual Training	10.2.2
112.7(g)(1)	Security – Fencing	6.3
112.7(g)(2)	Flow/Control Valves Closed	
112.7(g)(3)	Start Up Controls Locked	
112.7(g)(5)	Security – Lighting	6.3
112.7(k)	Oil Filled Equipment	
112.8(b)	Drainage from Secondary Containment	
112.8(c)(1)	Compatibility of Containers	4.2
112.8(c)(2)	Secondary Containment	4.2
112.8(c)(6)	Integrity Testing	
112.8(c)(8)	Loading/Unloading Procedures	5.1
112.8(c)(10)	Removal of Spill Oil in Containment	
112.20	Facility Response Plan – Determination of Substantial Harm Criteria	(Tab 12 – Reserved)

1.3 Professional Engineer Certification

Currently not required. This section is required to be added if the facility becomes subject to the SPCC requirements.

1.4 Management 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, of 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 willful violations."

Alicia Hickman, President
All South Scrap Processors

11-11-24
Date

Section 2 Plan Organization

2.1 NPDES General Permit

As required, this Plan has been developed and reviewed to meet requirements established under the Mississippi Department of Environmental Quality (MDEQ) regulations and published in their Industrial Storm Water General Permit for Industrial Activities and the Federal *National Pollutant Discharge Elimination System* as presented in 40 CFR 122.26(b)(14). All South Scrap Precessors applied for coverage under the State's General NPDES Permit for Industrial Activities. The permit requires periodic monitoring and development of a Best Management Practices Plan, which is included in this Storm Water Pollution Prevention Plan. A copy of the storm water general permit is attached in Tab 1.

2.2 Plan Distribution

Copies of this document have been retained at the following locations:

Copy Number	Location
1	All South Scrap Processors

2.3 Plan Updates

This Plan will be amended whenever there is a modification in design, construction, operation or maintenance of the facility that may change the potential for pollutants to impact storm water. Under the SPCC requirements the Plan is required to be reviewed once every five years and a condition of the permit is that an Annual Comprehensive Site Evaluation be completed. Additionally, the Plan must be reviewed and updated: after a release of 1,000 gallons or more of oil; after two releases of 42 gallons of oil or more that occur within a 12-month period; and after facility changes that alter the amount or type of storage or containment of oil.

Tab 3 contains a copy of the System Design and Procedural Change Report form that will be utilized to document changes.

The delivery of an amendment to this Plan to the regulatory agency issuing or overseeing the general permit is not routinely necessary. Should the director of the controlling agency, however, request copies of the Plan or its amendments, they shall be made available.

The effective date and revision status of the Plan are indicated below.

Effective Date: **October 30, 2024**

Current Revision Date: _____

2.4 Record Retention

Records required by this Plan will be maintained on file for a minimum period of three years. The records will be of sufficient quality and quantity to support and document adherence to this Plan. The following is a list of records that will be required to be maintained on file at the facility with this SWPPP:

- Tab 4: Monthly Spill and Leak Log
- Tab 5: Routine/Monthly Visible Inspection Log
- Tab 6: Monthly Visual Jar Test Inspection Form
- Tab 7: Annual Comprehensive Site Evaluation Form
- Tab 8: Employee Training Log
- Tab 9: 5-Year Illicit Discharge Certificate

Other reports that will be maintained as part of this SWPPP to show compliance with the permit are as follows:

- Tab 1: NPDES Permit
- Tab 3: System Design and Procedural Change Report
- Tab 11: Correspondence

2.5 Required Regulatory Changes To The Plan

Should changes to this Plan be required by the controlling agency, those changes will be implemented not more than 30 days from receipt of the notification, unless the notification specifies a different schedule for compliance.

2.6 Consistency with Other Plans

This Plan has been developed in a manner consistent with other plans currently in operation at the facility. This plan was also developed to be consistent with the requirements of 40 CFR Part 112. Table 1.1 was included to summarize the requirements of 40 CFR Part 112 and cross reference where those requirements are included in this plan.

Section 3 Facility Overview

3.1 Owner and Operator

The facility is located at 1904 US 49, Wiggins, Stone County, Mississippi and is operated as All South Scrap Processors.

3.2 Facility Description

The site consists of an estimated 22.2 acres, of which approximately, one half is in operational use, located in Wiggins, Stone County, Mississippi and contains an office, truck scale and two primary pieces of fixed equipment (shredder and shear). Surrounding land use consists of industrial and commercial property. The primary operation of the facility is scrap metal recycling and automobile recycling. Figure 1 is a topographic map and Figure 2 shows an aerial view and Figure 3 is a site schematic with the following information:

- Buildings and other permanent structures,
- Storage areas for significant materials,
- Areas of vegetation,
- Areas of exposed and/or erodible soil,
- Impervious surfaces, including roof, bituminous pavement, and concrete,
- Approximate property boundary, and
- Storm water drainage structures.

Stormwater from the site ultimately discharges into an unnamed tributary of Red Creek. The majority of stormwater generally flows off the north end of the operational area and into an intermittent stream that flows south just east of the property. Portion of the north and south sides of the property contains vegetation as well as on the east and west property which provides a buffer zone. The intermittent stream confluence with Red Creek is well southwest and on the west side of Hwy 49.

3.3 Emergency Equipment

The following emergency equipment is available at the facility in the event of a spill. Spill equipment is located on-site within oil storage buildings, and may include:

- Absorbent Pads,
- Oil Dry, and
- Shovels and Brooms.

3.4 Non-Structural Controls

The facility has established a number of non-structural controls to assist in pollution prevention management. These controls include employee training and record retention, written material handling practices, a definitive program for routine preventative maintenance, and the identification of significant materials utilized at the facility. These controls are further discussed in Section 9 of this Plan.

3.4.1 Pollution Prevention Team

Manages day-to-day operations for the facility. The facility manager is responsible for reviewing facility operational modifications and implementing necessary changes to ensure environmental compliance.

3.4.2 Environmental Health and Safety Manager (EH&S)

The EH&S manager is responsible for day-to-day activities, inspections, training of contractors and employees, and maintaining overall compliance with the NPDES Permit.

3.5 Structural Controls

The facility has also established structural controls to assist in pollution prevention. These controls include double wall storage tanks, earth berms, and green zones and are further discussed in Section 9 of this Plan.

3.6 Facility Drainage

The site storm water generally flows to the north. The east side of the site eventually breaks slope and drains into the drainage ditch located between the site and the railroad. The entrance road generally drains to the south. No structural controls are on site. A "green zone" is currently maintained between the operational area of the site and the property boundary.

Section 4 Potential Pollution Exposure

Potential pollution exposure at the site may be associated with fuel dispensing areas, indoor storage of significant materials, and spill and leaks from machinery. Safety Data Sheets (SDS) of significant materials on site are maintained in a separate document.

4.1 Underground Storage Tanks

This facility does not currently use USTs.

4.2 Aboveground Storage Tanks

The facility currently utilizes various tanks and reservoirs for equipment on the site. The following summarizes these items:

Tank Id	Purpose	Capacity	Material	Containment
*Tank #1:	Generator	500-gallon	Diesel	Double Wall
*Tank #2:	Shredder	250-gallon	Hydraulic Oil	Double Wall
*Tank #3	Oil	150-gallon	Used Oil	Double Wall
Reservoir #1	Shear	80-gallon	Hydraulic Oil	No
Reservoir #2	Shear	40-gallon	Hydraulic Oil	No

Total 1,020-gallon capacity

*Tank owned All South Processors.

A 220-gallon tote could be used periodically to collect used oil.

4.2.1 Potential for Hazardous Material Exposure

Potential hazardous material exposure may result if a spill occurs during filling, dispensing of materials from the containers, or if the AST systems fail and are damaged. Materials stored in ASTs such as oxygen, propylene, argon, LP gas and acetylene are all gases and do not pose a significant threat to "Waters of the State". The rate of release and the quantity of a potential oil spill/release is dependent on the manner of which the release occurs. The potential for impacts to "waters of the state" is also dependent on meteorological conditions. Under most release scenarios there is not enough product in the vessels to reach the water ways. If needed a small detention area could be

constructed on the north end of the property to prevent any materials from reaching the waterway. The nearest drainage way is located north and east of the property and significant storm water runoff is required for most release to reach the drainage way.

4.2.2 Pollution Prevention System

As part of the pollution prevention system, containers are to be clearly labeled and are situated on a concrete slab. Strict filling, dispensing and handling practices are administrated, and periodic observation, maintenance and inventory control procedures are specified to minimize spills and/or over fills. The containers should be placed in a safe, secure area out of the flow of normal traffic.

In the event product is spilled, it will be immediately contained using drip pans, dikes, or absorbent materials. An adequate supply of oil absorbent materials should be on hand at all times. Generated waste materials will be appropriately containerized, labeled, stored and disposed and/or recycled consistent with applicable federal, state and local regulations governing such waste material. In the event of a release, immediate action will be taken to mitigate the release and implement corrective action procedures as dictated by site conditions.

4.3 Indoor Storage of Significant Materials

"Significant" materials are to be stored at this facility either inside a building or are under roof. For these materials to come in contact with storm water a spill would have to occur and flow out of the buildings, or a release would have to occur from a machine stored on the yard. The product/inventory is stored mostly outside in the yard. This material could come in contact with storm water.

4.3.1 Potential for Hazardous Material Exposure

Potential hazardous material exposure may be associated with the storage and utilization of various significant materials, such as ignitable hydrocarbons or organic lubricants. Exposure may also be associated with general cleaning products that are stored and used on-site.

4.3.2 Pollution Prevention System

As part of the pollution prevention system, significant material product containers brought to the facility will be inspected prior to acceptance to minimize the possibility of

discharge of products into the environment. In addition, all waste materials associated with the use of cleaning products will be appropriately containerized, labeled, stored, disposed and/or recycled consistent with applicable federal, state, and local regulations governing such waste material.

Section 5 Material Handling Process

5.1 AST/UST Loading and Dispensing Procedures

Currently this facility receives small bulk shipments of fuel and oil. An oil recovery truck periodically removes the used oil. During this process any oil leaks or spills are required to be cleaned up immediately. If in the future larger vessels are used at the site then Department of Transportation (DOT) standards for unloading, loading, transporting, labeling and placarding are recommended. The following is a summary of the unloading and loading procedures for tank systems at the facility:

5.1.1 Bulk Loading

Management at the facility has implemented a six-step process for the loading of fuel products into tank systems. Bulk loading of the systems is executed by the vendor. The six steps are: (1) verify the amount of product remaining within the tank; (2) connect the transfer hose from the tanker truck to the fill pipe; (3) observe the sight gauge on the drop spout when product is transferred; (4) discharge a metered volume of product into the tank; (5) visually monitor the transfer of product into the tank and; (6) verify the volume of product in the tank at the end of the filling process. Please note that it is the responsibility of the vendor to visually monitor the transfer of product into the tank.

5.1.2 Bulk Unloading

Currently bulk unloading of significant materials is not conducted at this facility.

5.2 Significant Material Handling Procedures

Packages, product delivery vehicles, and maintenance vehicles are inspected upon arrival and prior to the unloading of any significant materials. Visual inspection of the process is performed by the vendor and also observed by a qualified facility employee. If a tank is damaged or appears suspect the tank will either be replaced, or an integrity test may be conducted on the tank. The preference will be to replace the tank. If an integrity test is performed the test method will have to meet industry standards.

Section 6 Program for Routine Preventative Maintenance

6.1 Description of Program

As a requirement of the Plan, the facility has designed a program for the routine preventative maintenance of pollution prevention management and control devices. Documentation of each inspection or corrective action is maintained on file for a period of three years from the date of the occurrence. Inspection logs will be utilized by the facility as a guide to document preventative maintenance measures in support of pollution prevention at the facility.

6.2 Good Housekeeping Procedures

Facility operators and management maintain common-sense procedures to promote health, safety and the protection of the environment. The following procedural measures are in place at the facility to minimize the potential for hazardous or significant material release exposure:

- Material storage practices will be consistent with requirements imposed by the State of Mississippi related to the storm water NPDES Permit, the Federal Resource Conservation and Recovery Act (RCRA) and the Federal Oil Pollution Prevention regulations.
- Routine and regular cleanup schedules are prescribed for the maintenance of the facility, loading/unloading sites, and general upkeep of the grounds.
- A Hazard Communication Program is maintained to make employees aware of potential hazards that may be encountered during handling or use of hazardous materials.
- Education and skill training are provided to enable employees to work with minimal risk to health, safety, and the environment.
- Appropriate employees are trained in the use and limitations of safety equipment and materials.
- Appropriate employees are trained to be aware of the location and proper use of emergency response equipment and cleanup and control materials.

6.3 Security

Admittance to the property during business hours may not be obtained without proper identification. All individuals and contractors are required to check in at the main office. Additionally, facility vendors and guests are required to be escorted by facility personnel during their respective visits to the facility.

Section 7 Spill Control Procedures

The facility has designed a program for review of routine spill control procedures that are conducted on a daily basis during typical business activities. Documentation of each spill incident and/or corrective action will be maintained on file for a period of three years from the date of occurrence. The spill control procedures will be utilized by the owner or operator as a guide to identify appropriate actions in the event of a spill at the facility. The coordination of hazardous material release response activities should be directed to the following personnel:

EH&S Maintenance Manager–Mike Vanden Bergh
Mobile: 850-598-0084

David Hickman
Mobile: 228-348-2158

A complete list of all names and phone numbers of persons who should be contacted in the unlikely event of a spill or emergency is provided in Tab 10. It is the responsibility of the owner to report spills to a regulatory agency, if necessary. All spills/releases are required to be logged on the Monthly Spill and Leak Log (Tab 4). This log is required to be completed every month even if no spill or leaks occurred.

7.1 Surface Spill Control Procedures

In the event of a significant spill at the facility, the following steps will be initiated:

(1) the source of the release will be isolated and, if applicable, power to the equipment will be turned off.

(2) spillage will be directed to a centralized secondary containment area, if applicable.

(3) absorbent booms, pads, and other spill response equipment and materials will be utilized to contain the spilled material.

(4) the affected area will be isolated, and access will be restricted pending completion of the response and cleanup procedures; and

(5) the release will be reported to the supervisor-in-charge so that necessary internal and regulatory reporting can be completed.

7.2 Evacuation Procedures

In the event of a spill that poses an immediate threat to human health, the following steps will be implemented:

(1) if possible, power to equipment will be turned off;

(2) personnel will proceed off-site or to a safe location as may be dictated by site conditions;

(3) appropriate emergency response agencies (i.e., fire, rescue, police, ambulance) will be contacted;

(4) the problem or circumstances (fire hazard, explosion, etc.) will be clearly identified to the General Manager who, in turn, will provide appropriate communication with regulatory agencies; and,

(5) facility personnel will assist in response activities to the extent practicable and consistent with their level of training.

7.3 Disposal Procedures

Once containerized, characterized, and labeled, spilled product and ancillary waste material will be recycled or shipped by a qualified and licensed contractor as determined by All South Scrap Processors.

7.4 Spill Reporting

The EH&S Manager will be responsible for reporting incidents to the appropriate regulatory authorities. Under no circumstance is any employee permitted to report such incidents outside of the internal channels unless it is necessary to safeguard human health and property.

Section 8 Storm Water Pollution Prevention

This *Storm Water Pollution Prevention Plan* (SWPPP) was developed to provide a comprehensive, integrated approach to environmental management and compliance at the facility and meet the NPDES permit requirement to develop a Best Management Practices Plan. Topics covered in this section include spill prevention and control procedures for oils, hazardous materials, and hazardous wastes which may adversely impact storm water quality.

8.1 Overview of Permit

Discharge permits under the *National Pollutant Discharge Elimination System* (NPDES) are required by the *Federal Clean Water Act.* As such, the State of Mississippi obtained a General NPDES Permit covering storm water discharge that includes various industrial activities (based on Standard Industrial Classification (SIC) code) or individual permits for other industries. All South Scrap Processors is requesting coverage under the State of Mississippi General Industrial NPDES Permit. This permit requires a SWPPP with appropriate BMPs be developed and implemented.

8.2 Authorized Storm Water Discharges

The facility was visually inspected for non-storm water discharges. Non-storm water discharges on the property are minimal and includes condensate from air conditioners and small air compressors. No other non-stormwater discharges were noted. Sanitary sewage is managed on site in a septic system. Information related to storm water discharge is as follows:

8.2.1 Outfalls and Related Drainage Areas

Storm water will be monitored at location 001, which is located on the north side of the site. This water eventually flows to an unnamed tributary of Red Creek that flows south near the east property boundary.

8.2.2 Receiving Surface Water

Storm water from the site discharges into an unnamed tributary of Red Creek. This tributary flows south near the east property line. South of the site the tributary eventually turns and flows southwest to the confluence of Red Creek.

8.3 Authorized Non-Storm Water Discharges

Coverage under the state's General Permit does not authorize non-storm water discharges from the property. The facility was visually inspected for non-storm water discharges and included air condition units and small air compressors. These items are allowed under this permit.

8.4 Inventory of Exposed Significant Materials

Inventory is stored outside and some of these materials could contain oily residue that could be exposed to storm water. Equipment used on the site contains petroleum products. The equipment contains motor oil, hydraulic oil, transmission oil, and engine coolant. Fluids are required to be drained from automobiles and other items prior to their arrival on site.

8.5 Management of Significant Materials

All South Processors will manage its significant materials in a method to prevent storm water pollution to the Maximum Extent Practicable (MEP). The following is a summary of methods used to prevent storm water pollution to the MEP, as well as the completion status for each method.

8.5.1 Minimization of Exposure from Storage of Materials

Significant materials, such as oils, anti-freeze and batteries are to be stored under roof where they are not exposed to precipitation. Waste materials such as plastic, glass (non-salvageable materials) should be placed in the dumpster at the end of each day. Inspections of incoming material (cars) should be conducted.

Status: Minimization of exposure to the MEP is complete.

8.5.2 Minimization of Exposure During Handling, Shipping, Loading

The facility has loading and unloading procedures to prevent releases. In addition, loading and unloading areas are inspected as part of the routine facility inspections.

Status: Minimization of exposure to the MEP is complete.

8.5.3 Minimization of Exposure During Equipment Maintenance

All maintenance activities for machinery, equipment, or vehicles should be conducted under roof, if feasible. If work is conducted outdoors, absorbent pads should be used in case of a spill or leak.

Status: Minimization of exposure to the MEP is complete.

8.5.4 Develop Response Planning

The facility has detailed spill control procedures in place. Appropriate staff are trained in these procedures annually and emergency equipment for response to releases is located in each building.

Status: Training is ongoing.

8.5.5 Implement Storm Water Best Management Practices

The facility has a number of measures and controls in place which meet the USEPA definition of Best Management Practices. All staff receive annual training in these procedures and compliance is documented annually in the *Annual Report*.

Status: Minimization of exposure to the MEP is complete.

8.6 History of Significant Spills and Leaks

There have been no known reportable spills in the previous three years at the facility. Leaks, drips and small spills occur frequently. These types of spills are required to be cleaned up at least by the end of the day but should be cleaned up when they occur. In the event a reportable spill occurs while this Plan is in effect, it is required to be posted on the Monthly Spill and Leak Log.

8.7 Evaluation for Non-Storm Water Discharges

Visual inspection of the facility was the method used to identify non-storm water discharges. The facility does not currently discharge process water onto the property. The only non-storm water identified was condensate from air conditioning units, and air compressors.

8.8 Storm Water Monitoring Requirements

8.8.1 Standard Monitoring Requirements

The facility is required to sample its storm water at a minimum monthly as required for coverage under the State's General NPDES Permit. The jar test method is required and must be logged on the Monthly Visual Jar Test Inspection

Form. Monitoring is to be conducted by collecting a grab sample within the first half hour of a storm water discharge, however, the sample cannot be collected if there has been a significant rainfall event (rainfall sufficient to result in run-off from the facility) within the last two full operating days. The sample must be representative of the storm water discharge for that outflow. If the facility has more than one outflow on-site, each outflow must be monitored separately. If there is reason to believe, however, that the outflows are substantially the same, one sample may be collected and the test results used in the record for both outflows. The monitoring point will be north of the shredder mill at a point within the "green zone".

8.8.2 *Monitoring for the Presence of Exposed Materials after a Release*

If the facility has a release of a Water Priority Chemical (WPC) that is subject to §313 of SARA Title III then the facility is required to sample the storm water discharges associated with the release or exposure. The samples are to be analyzed for each of the constituents which will indicate the presence of all WPCs released or exposed. At the time of each sampling, flow is to be estimated. Sampling shall occur twice a year and shall continue until it is demonstrated that the WPCs are no longer present in any discharged associated with the release or exposure.

8.8.3 *Monitoring Records*

Records of all sampling and analysis shall include the date, exact place, and time of the sampling and measurements. Records should also be made of who performed the sampling, the procedures used for sample collection and preservation, who conducted the analysis, and the date and time of the analysis. Records should include references and written procedures, when available, for the analytical techniques or methods used for analysis, as well as the results, including bench sheets, instrument read-outs, and computer disks or tapes used to determine the results.

8.9 Implementation Schedule for Identified Storm Water Management Controls

The following schedule will serve as a quick reference for required activities conducted at the facility:

- Comprehensive Site Evaluation
  Annual
- Spill and Leak Log
  Monthly

- Routine Visible Inspection

  Monthly

- Visual Jar Test Inspection

  Monthly - minimum

- Sampling: Sampling is required semi-annually. Sampling is more frequent if there are priority chemicals released subject to §313 of SARA Title III reporting has occurred.

- Employee Training

  Annually

- National Response Center: Immediate phone report (only required if a Reportable Quantity release limit is exceeded).

- Plan Revisions: Within two weeks of MDEQ instruction or potential other non-compliance event.

- BMP Revisions: Effective date (Initial Draft – August 16, 2024, Final October 30, 2024).

- Spill/Leak or Noted Non-Compliance issue

  7-Days to correct

- Illicit Discharge Certification

  Every 5-years

Section 9 Measures and Controls

The proposed objectives of this Plan are to identify:

(1) the person or persons responsible for inspection and management of storm water controls at the facility;

(2) significant materials that could contact storm water discharged from the facility;

(3) non-structural controls used to prevent significant materials from entering storm water;

(4) structural controls, if needed, to prevent significant materials from entering storm water, and to provide additional control or treatment for storm water that has become contaminated by significant materials; and

(5) procedures for regularly evaluating and updating the Plan.

This Plan describes the measures and controls that are intended to aid in the mitigation and control of storm water at the facility.

9.1 Good Housekeeping

As part of this Plan, facility personnel will conduct their respective job functions in a manner which keeps the facility grounds free of litter and debris that may affect storm water quality. Such good housekeeping practices are important for the successful implementation of this Plan and are outlined below:

- Material storage practices are specified in accordance with requirements imposed by the State of Mississippi; Federal National Pollutant Discharge Elimination System (NPDES) relating to storm water management; Resource Conservation and Recovery Act (RCRA) and Oil Pollution Prevention regulations.
- Routine and regular cleanup schedules are prescribed for the maintenance of the facility loading/unloading sites, and general upkeep of the grounds.
- A Hazard Communication Program is maintained to make employees aware of potential hazards that may be encountered during handling or use of hazardous materials.
- Education and skill training are provided to enable employees to work with minimal risk to health, safety, and the environment.
- Appropriate employees are trained in the use and limitations of safety equipment and materials.
- Appropriate employees are trained to be aware of the location and proper use of emergency response equipment, and cleanup and control materials.

9.2 Preventative Maintenance

Facility management recognizes the importance of properly maintaining facility equipment and systems. As such, management will support completion of necessary and appropriate maintenance activities required by equipment manufacturers.

9.3 Visual Inspections

The facility will be inspected on a periodic basis as provided by this Plan. These periodic inspections will include a survey of the facility to identify areas, procedures, and/or practices, which may cause contamination or storm water runoff. Wherever possible, this inspection will coincide with other routine inspections required by other operational plans already in place at the facility. Currently the NPDES permit requires the facility to conduct a minimum of one inspection per month and document on the attached form.

Facility personnel performing periodic inspections will be trained regarding the storm water pollution prevention program. Inspections will be documented and documentation will be retained as provided by this Plan.

9.4 Spill Prevention and Response

Spills or accidental releases of an oil or hazardous material or waste must be reported and logged on the Monthly Spill & Leak Log in Tab 4. If the spill or release is minor and totally contained, internal plant reporting may be all that is required. This internal reporting is crucial because the information can lead to improvements in:

1. Cleanup and disposal procedures,
2. Inspection scopes and/or schedules,
3. Reporting and notification procedures, and
4. Process procedures.

If the material spilled or released is "hazardous" or "extremely hazardous" and the amount is in excess of applicable Reportable Quantities (RQ), additional outside notification is required. If a release of a Title III substance over the RQ occurs, notification must include the National Response Center at 800-424-8802.

Written follow-up notification to regulatory agencies may be required. In this event, the written notice shall set forth and update the information above and include more information with respect to:

1. Actions taken to respond to and contain the release;

2. Known or potential acute or chronic health risks associated with the release; and
3. Where appropriate, advice regarding medical attention necessary with release.

The notice must fully document the time of release discovery, the names and times of agency and company notifications, estimates of the quantity released, location of the discharge, and response measures initiated.

Following submission of a spill or release report, site visits are often made by personnel from regulatory agencies. The EH&S Manager should be informed of planned visits by outside agencies and provided information concerning the expected visitors and facility staff who should be notified upon their arrival. While on-site, visitors are to be escorted by a staff member or delegate at all times.

Only factual information should be provided to outside agencies. The appropriately authorized facility agent must not speculate as to the cause of an event or comment on any possible negligence on the part of an employee. Personnel are not to fill out or sign any report form provided by regulatory agencies. All such requests shall be forwarded to the General Manager.

9.5 Sediment and Erosion Control

The potential for contributing sediments to storm water at the facility will be minimized by implementing the following Best Management Practices:

1. Provide clay/concrete vehicle loading pads in areas of heavy vehicle traffic. This practice prevents and minimizes exposure of soil in high traffic areas.
2. Where possible, stabilize the perimeters of the active areas by seeding, mulching, or sodding. This practice can significantly slow the rate of storm water runoff and decreases the sediment load in runoff waters.
3. Where appropriate, install temporary diversion devices to control storm water runoff until vegetation has been established.
4. Advise vehicle operators to maintain a slow speed.

9.6 System Design and Procedure Changes

Should routine, specific, or compliance evaluation inspections require a design or procedural change in the conveyance of storm water runoff or materials handling, these changes will be documented in this Plan. The format for recording these changes is identified in the attached form "System Design and Procedural Change".

System design and procedure changes may be cross-referenced in other record-keeping sections, especially when procedural changes require the notification and training of employees or subcontractors in new methods.

9.7 Corrective Actions for Release Incidents

During implementation of this Plan, the effectiveness of corrective action, if necessary, will be reviewed periodically. The results of these reviews will be included in the ongoing employee training.

Documentation of corrective actions may be cross-referenced in other record-keeping sections, when procedural changes require the notification and training of employees or subcontractors in new methods, or when a system design change is necessary.

Section 10 Training

Personnel responsible for implementing and maintaining the Plan must receive proper training, understand their duties and function, and fulfill their duties in a safe and timely manner. The facility has several training programs, including formal on-the-job training.

10.1 Training Program Summary

10.1.1 Pollution Prevention Training

Appropriate personnel at all levels of responsibility at the facility will be trained to understand the goals of this Plan. This training will occur upon initial hire to an appropriate job classification within the facility. The training will address each of the provisions of this Plan, including personal and company responsibilities, use of pollution prevention systems, proper storage, use and labeling of potentially hazardous materials, soil erosion control, requirements for routine preventive maintenance, proper waste characterization and disposal, and notification requirements and spill response measures.

10.1.2 Additional Training

Typically, personnel at the facility receive extensive training and on-the-job proficiency evaluations to qualify them for their positions. A discussion of all available training programs is beyond the scope of this document. There are a number of specific training topics for each job classification or specific job task that complement the goals of the Plan. Specifically, the General Foreman and Alternate Facility Contacts receive additional ongoing training necessary to allow the safe operation of the facility.

10.2 Record-Keeping and Internal Reporting

The facility has established a reporting and filing system to document inspections, employee and subcontractor training, system design changes and corrective actions for spill incidents or adverse storm water impacts. These records will be maintained and controlled by the designated EH&S manager.

10.2.1 Inspection Reports

a. A minimum of monthly inspections will be performed as part of the facility's normal operations. These will not be conducted according to a rigid schedule but will be completed when site or weather conditions are suitable.

A comprehensive site evaluation is required to be performed for the facility. The minimum frequency is once per year.

10.2.2. Employee and Subcontractor Training

Training in storm water pollution control will be combined with other employee training for material handling, storage and disposal. These training sessions are not rigidly scheduled and are typically emphasized as part of a daily work briefing.

When specific training for spill prevention and/or storm water pollution control is conducted, it will be documented as illustrated in Tab 8. This training will be performed, at a minimum, one time per year and will cover preventive measures, laws and regulations, and the contents of this Plan.

Subcontractors performing on-site work that may impact storm water are notified of the facility's desire to protect storm water quality. Appropriate training for these subcontractors will be documented on the forms found attached in Tab 8.

Section 11 Waste Disposal

11.1 Non-Hazardous Waste

Non-hazardous waste generated at the facility consists of general refuse disposed in an appropriately licensed solid waste disposal/recycling facility. Non-hazardous waste typically consists of office refuse, waste equipment components, and steel.

11.2 Hazardous Waste

This facility does not generate hazardous waste.

Section 12 Comprehensive Inspection

The comprehensive inspection of equipment, buildings, material storage areas, and structural and nonstructural pollution prevention control should be conducted annually. The date and results of the inspection, and the status of incidents of non-compliance will be included in an *Annual Report.*

Incidents of non-compliance, if identified, will include a listing of the potential hazards discovered during the facility's self-imposed routine preventative maintenance checks. The *Annual Report*, detailing incidents of non-compliance will be retained on site.

12.1 Comprehensive Site Compliance Evaluation

A Compliance Evaluation Inspection will be conducted on an annual basis by a qualified individual or firm outside this facility's employee group. This inspection and associated activities will include:

- Inspection of storm water drainage areas for evidence of pollutants entering the drainage system.
- Evaluation of the effectiveness of measures to reduce pollutant loading of storm water runoff and an indication of the need for additional controls.
- Inspection of any equipment (spill control) needed to implement the Plan.
- Storm water sampling and monitoring.
- Revision of the Plan within two weeks of the Compliance Evaluation Inspection.
- Implementation of necessary changes within a timely manner, not to exceed 12 weeks from the inspection date.
- Preparation of a report summarizing the inspection results and, most important, follow-up actions. This report should include the date and the name of the person who performed the inspection, as well as the descriptions of any incidents of non-compliance or a certification that the facility is in compliance with the Plan.

12.2 Material Receiving/Unloading Areas

Packages, product delivery vehicles, and maintenance vehicles are inspected upon arrival and prior to the unloading of potentially hazardous materials. Visual inspection of the process is performed by the vendor and also observed by a qualified facility employee.

12.2.1 Storage Areas

An inspection of product/material dispensing areas should be conducted by facility employees each time product/material is dispensed or placed in storage.

12.2.2 Product/Material Dispensing Areas

An inspection of product/material dispensing areas should be conducted by facility employees each time product/material is dispensed.

Certification of Substantial Harm Determination Form

Facility Name: All South Scrap Processors
Facility Address: 1904 US 49
Wiggins, MS 39577

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   YES _____ NO X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation with any aboveground storage tank area?
   YES _____ NO X

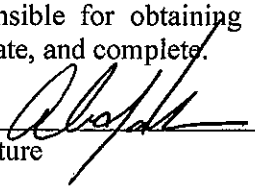
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" and the applicable Area Contingency Plan.
   YES _____ NO X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
   YES _____ NO X

5. Does the facility have a total storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?
   YES _____ NO X

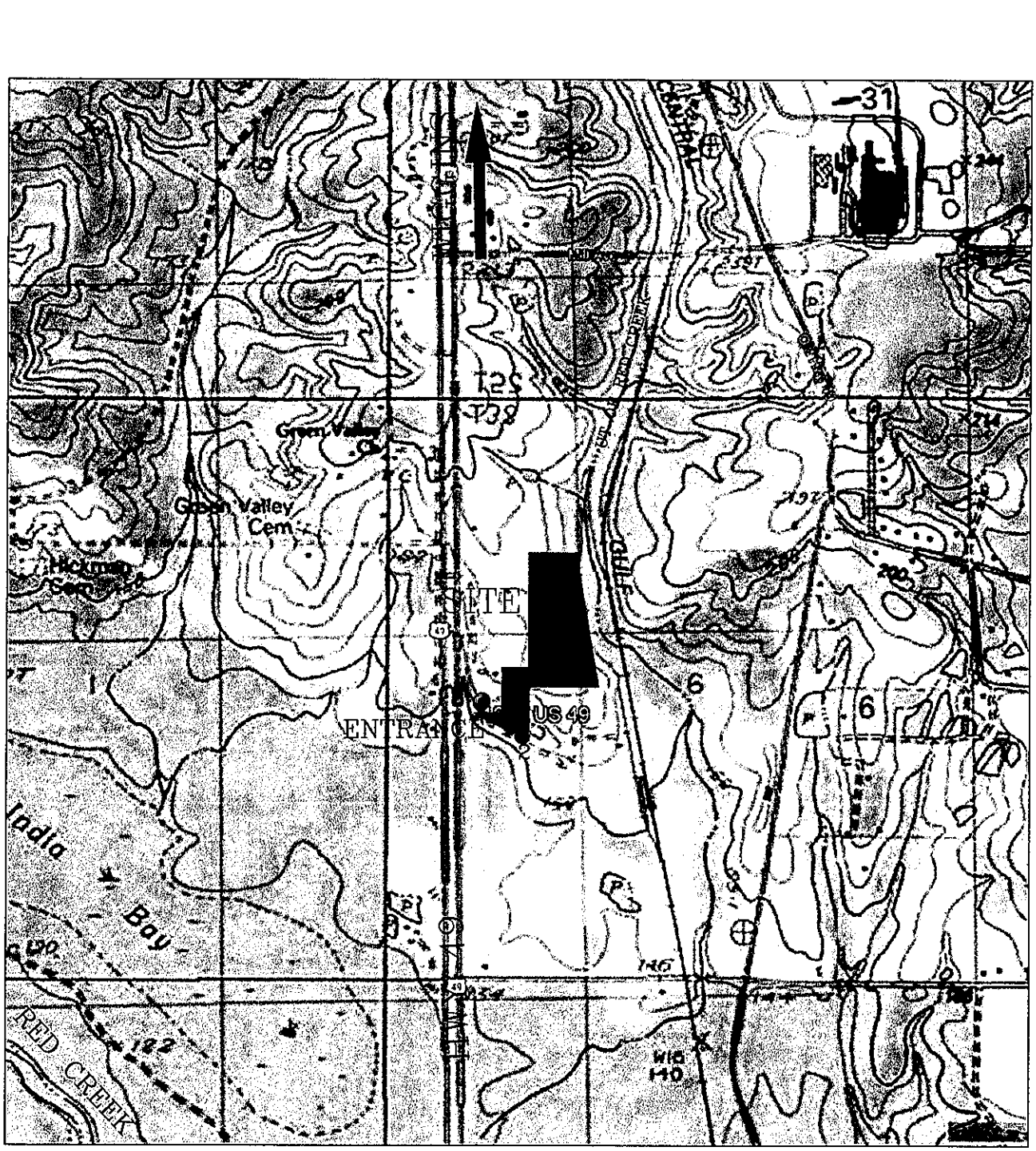
Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.



Signature — President (Title)

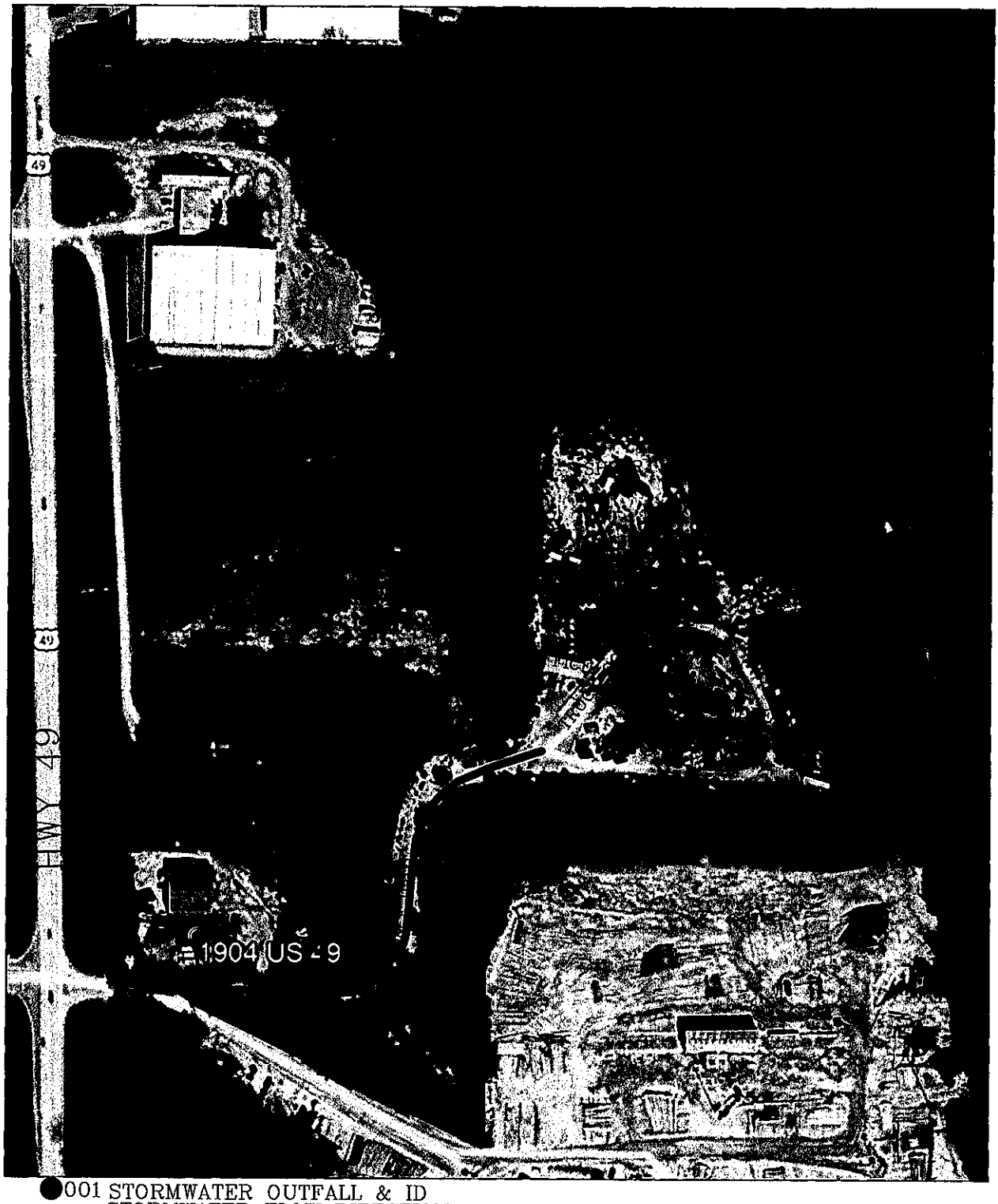
Alicia Hickman (Name (please type or print)) — 11-11-24 (Date)



● 1 STORMWATER OUTFALL & ID

PORTION OF A USGS TOPOGRAPHIC QUADRANGLE MAP

Figure 1 Drawn by: TBR Date: 7-30-24	GENERAL SITE LOCATION MAP USGS TOPOGRAPHIC MAP NOI – NPDES PERMIT APPLICATION ALL SOUTH SCRAP PROCESSORES 1904 US 49 WIGGINS, STONE COUNTY, MS	*COASTAL ENVIRONMENTAL SOLUTIONS, INC.* PO BOX 580 Wetumpka, Al 36092 Phone: (334) 391-3273



●001 STORMWATER OUTFALL & ID
← STORMWATER FLOW DIRECTION

Figure 2 Drawn by: TBR Date: 7-30-24	GENERAL SITE LOCATION MAP AERIAL SITE MAP NOI – NPDES PERMIT APPLICATION ALL SOUTH SCRAP PROCESSORES 1904 US 49 WIGGINS, STONE COUNTY, MS	*COASTAL ENVIRONMENTAL SOLUTIONS, INC.* PO BOX 580 Wetumpka, Al 36092 Phone: (334) 391-3273

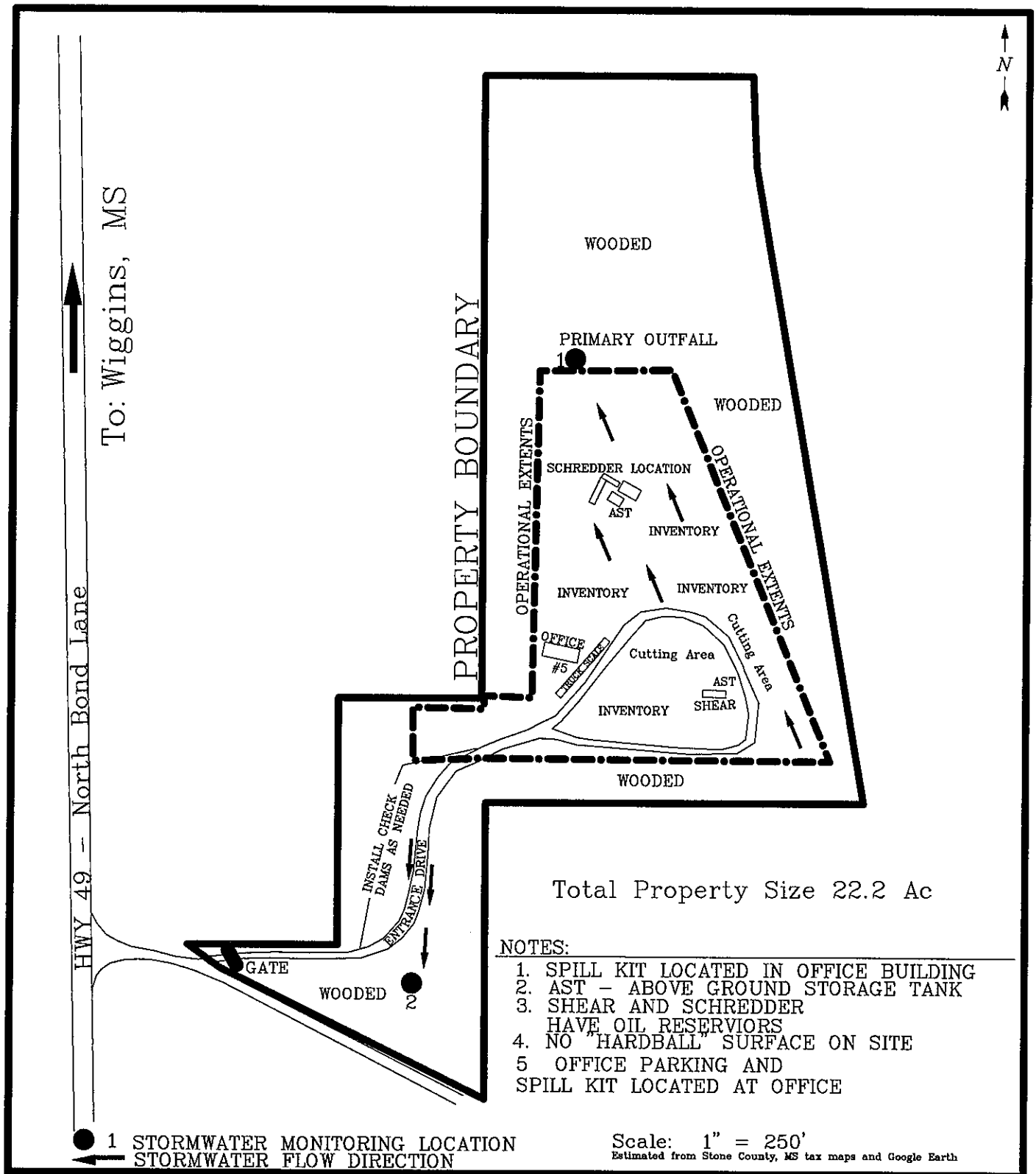


Figure 3 Drawn by: TBR Date: 7-30-24	GENERAL SITE LOCATION MAP AERIAL SITE MAP NOI – NPDES PERMIT APPLICATION ALL SOUTH SCRAP PROCESSORES 1904 US 49 WIGGINS, STONE COUNTY, MS	*COASTAL ENVIRONMENTAL SOLUTIONS, INC.* PO BOX 580 Wetumpka, Al 36092 Phone: (334) 391-3273

SYSTEM DESIGN AND PROCEDURAL CHANGES REPORT

(Mandatory for any changes with a facility's equipment, operations, or processing.)
(Mandatory for any changes with a facility's materials, handling, or storage.)

Facility Name: All South Scrap Processors
Reporter's Name: _____ Date: _____
Reason for Report: _____

Process which Generated Change: _____ Date: _____

Design or Procedural Change Information

Description of Changes: _____

Change Implementation Information

Start Date: _____ Finish Date: _____
Project Supervisor: _____
Project Contractor: _____

Change Completion/Evaluation Information

Evaluator's Name: _____ Evaluation Date: _____
Effectiveness of Change: _____

Need for Modification Actions: _____

Facility Name _____

Physical Address _____

Monthly Spill & Leak Log Sheet

Month/Year _____

Permit 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 Individual NPDES Permit SWPPP Forms Package. A separate form shall be completed for each month that the facility is covered under this permit. If no spills have occurred, the form shall be completed by checking the available box and signing it as indicated. Permit 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.

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

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

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

As required by ACT10 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

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

BASELINE STORM WATER GENERAL PERMIT
COVERAGE NUMBER (MSR_ _ _ _ _ _ _)
ANNUAL COMPREHENSIVE 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)			
	Yes	No	Findings & Remedial Action Documentation
SEDIMENT AND EROSION PREVENTION			
• 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? YES	ANY DEFICIENCIES? NO	IF YES, WERE CORRECTIVE ACTIONS TAKEN? YES	IF YES, WERE CORRECTIVE ACTIONS TAKEN? NO	INSPECTOR(S)

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.

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

NON-STORMWATER/ILLICIT DISCHARGE EVALUATION

(Mandatory Every Five Years)

Facility Name: All South Scrap Processors

Reporter's Name: _____ Date: _____

Reason for Report: 5-Year Evaluation

List any Non-Stormwater Discharges

Source	Is discharge allowed under the Permit (yes/no)
Air Compressors	
Air Conditioners	
Others:	

Change Implementation Information if answer above is "No"

Start Date: _____ Finish Date: _____

Project Supervisor: _____

Corrective Measure: _____

Change Completion/Evaluation Information

Evaluator's Name: _____ Evaluation Date: _____

Effectiveness of Change: _____

All South Scrap Processors
Emergency Contact Numbers

Facility Contacts:

President –	Alicia Hickman
Office Telephone:	228-348-2158
Mobile Telephone:	
Operations Manager –	Jaden Anguizola
Office Telephone:	228-392-6070
Mobile Telephone:	
EH&S –	Mike Vanden Bergh
Mobile Telephone:	850-598-0084

Emergency Services **911 (24 hours)**

Local Contacts:

Stone County EMA	601-928-2800
Mississippi Emergency Management	601-933-6362
Wiggins Fire Department	**601-928-5446**
Wiggins Police Department	**601-928-5444**
Memorial Hospital	**601-928-6600**

U.S. Environmental Protection Agency 404-347-3454
Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

National Response Center	1-800-424-8802
Mississippi Poison Control Center	1-800-222-1222

Mississippi Department of Environmental Quality
(MDEQ) 601-961-5171