

Industrial SWPPP Template

Introduction

To help you develop a Stormwater Pollution Prevention Plan (SWPPP) that is consistent with the 2015 Multi-Sector General Permit (MSGP), the U.S Environmental Protection Agency (EPA) has created this Industrial SWPPP Template (or, “the Template”). Use of the Template will help ensure that your SWPPP addresses all the necessary elements required in Part 5 of the 2015 MSGP. Part 2 of the 2015 MSGP includes requirements (or effluent limits) that tell what you must physically do on-site to control pollutants in your stormwater discharges and that drive some of what is documented in your SWPPP.

Before completing the Template, make sure you read and understand the requirements in the 2015 MSGP. A copy of the MSGP is available at www.epa.gov/npdes/stormwater/msgp.

Using the Industrial SWPPP Template

Tips for completing the Template:

- **This Template is designed for use by all facilities eligible for coverage under the 2015 MSGP. The Template is NOT tailored to your individual industrial sector. Depending upon your industrial sector (see Appendix D of the 2015 MSGP) and where your facility is located (see Appendix C of the 2015 MSGP), you may need to address additional SWPPP requirements outlined in Part 8 (Sector Specific Requirements) and/or Part 9 (State/Tribal Specific Requirements) of the permit, respectively.**
- **Complete a SWPPP *before* submitting your Notice of Intent (NOI) for permit coverage.**
- **Each section includes “instructions” and space for your facility’s specific information. You should read the instructions for each section before you complete that section.**
- **The Template was developed in *Microsoft Word* so that you can easily add tables and additional text. Some sections may require only a brief description while others may require several pages of explanation.**
- **To make it easier to complete, the Template generally uses **blue text** where the operator is expected to enter information.**

EPA notes that while EPA has made every effort to ensure the accuracy of all instructions and guidance contained in the Template, the actual obligations of regulated industrial facilities are determined by the relevant provisions of the permit, not by the Template. In the event of a conflict between the Template and any corresponding provision of the MSGP, the permit controls. EPA welcomes comments on the Template at any time and will consider those comments in any future revision of this document.

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Stormwater Pollution Prevention Plan

for:

ODM Tool & Manufacturing Co., Inc
9550 Joliet Road
McCook, IL 60525
708-485-6130

SWPPP Contact(s):

Chip Michaelsen
9550 Joliet Road
McCook, IL 60525
708-485-6130
708-485-6540

SWPPP Preparation Date:

03/19/2020

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SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION.

1.1 Facility Information.

Instructions:

- You will need the information from this section to complete your NOI.
- For further instruction, refer to the 2015 MSGP NOI form and instructions – specifically sections C and D of the NOI. A copy of the 2015 MSGP NOI is available at www.epa.gov/npdes/stormwater/msgp (Appendix G of the permit)
- You must include a copy of the 2015 MSGP, or a reference or link to where a copy can be found, in Attachment C of your SWPPP.

Facility Information

Name of Facility: ODM Tool & Manufacturing Co., Inc

Street: 9550 Joliet Road

City: McCook State: IL ZIP Code: 60525

County or Similar Subdivision: Cook

NPDES ID (i.e., permit tracking number): None (if covered under a previous permit)

Primary Industrial Activity SIC code, and Sector and Subsector (2015 MSGP, Appendix D and Part 8):
SIC 3469, Sector AA, Subsector AA1

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (2015 MSGP, Appendix D):
Fabricated Metal Products 3411-3499, Sector AA, Subsector AA1

Latitude/Longitude

Latitude: 41° 47' 2.58" N Longitude: -87° 51' 26.136" W

Method for determining latitude/longitude (check one):

USGS topographic map (specify scale: _____) GPS

Other (please specify): _____

Horizontal Reference Datum (check one):

NAD 27 NAD 83 WGS 84

Is the facility located in Indian country? Yes No

If yes, name of Reservation, or if not part of a Reservation, indicate "not applicable." _____

Are you considered a "federal operator" of the facility? **NO**

Federal Operator – an entity that meets the definition of “operator” in this permit and is either any department, agency or instrumentality of the executive, legislative and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.

Yes No

Estimated area of industrial activity at site exposed to stormwater: 1.0 (acres)

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system

(MS4)? Yes No

If yes, name of MS4 operator: State of Illinois

Name(s) of surface water(s) that receive stormwater from your facility: Des Plaines River

Does this facility discharge industrial stormwater directly into any segment of an “impaired water” (see definition in 2015 MSGP, Appendix A)? Yes No

If Yes, identify name of the impaired water(s) (and segment(s), if applicable):

Identify the pollutant(s) causing the impairment(s):

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants:

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water (see definitions in 2015 MSGP, Appendix A)? Yes No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2015 MSGP Table 1-1)? Yes No

If Yes, which guidelines apply?

1.2 Contact Information/Responsible Parties.

Instructions:

- List the facility operator(s), facility owner and SWPPP contact(s). Indicate respective responsibilities, where appropriate.
- You will need the information from this section of the SWPPP Template for your NOI.
- Refer to Section B of the NOI instructions (available in Appendix G of the 2015 MSGP).

Facility Operator(s):

Name: [Chip Michaelsen](#)

Address: [9550 Joliet Road](#)

City, State, Zip Code: [McCook, IL 60525](#)

Telephone Number: [708-485-6130](#)

Email address: chipm@odmtool.com

Fax number: [708-485-6540](#)

(repeat for multiple operators by copying and pasting the above rows)

Facility Owner(s):

Name: [Chip Michaelsen](#)

Address: [10933 Fawn Trail Drive](#)

City, State, Zip Code: [Orland Park, IL 60467](#)

Telephone Number: [708-567-1619](#)

Email address: chipm@odmtool.com

Fax number: [Insert fax number \(optional\)](#)

(repeat for multiple operators by copying and pasting the above rows)

SWPPP Contact(s):

SWPPP Contact Name (Primary): [Timothy Cruickshank](#)

Telephone number: [708-485-6130](#)

Email address: tcruickshank@odmtool.com

Fax number: [Insert fax number \(optional\)](#)

SWPPP Contact Name (Backup): [Brandon Enright](#)

Telephone number: [708-485-6130](#)

Email address: benright@odmtool.com

Fax number: [Insert fax number \(optional\)](#)

1.3 Stormwater Pollution Prevention Team.

Instructions (see 2015 MSGP Part 5.2.1):

The stormwater pollution prevention team is responsible for overseeing development of and any modifications to the SWPPP, implementing and maintaining control measures/BMPs, and taking corrective actions when required. Each member of the stormwater pollution prevention team must have ready access to the 2015 MSGP, the most updated copy of the facility SWPPP, and other relevant documents.

- Identify the staff members (by name and/or title) that comprise the facility's stormwater pollution prevention team as well as their individual responsibilities.
- EPA recommends, but does not require, the stormwater pollution prevention team include at least one individual from each shift to ensure that there is always a stormwater pollution prevention team member on-site.

Staff Names	Individual Responsibilities
Frank Quinones, Production Manager, 1st Shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution.
Jesse Valladares, Stamping Lead-man, 1st Shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution, position oil/chemical containers =>55 gallons on appropriate spill pallets, connect/disconnect oil-feed piping system to 330 gallon IBCs, when replacing an empty IBC container.
Nicholas Santiago, Forklift Driver – Stamping, 1st Shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution, position oil/chemical containers =>55 gallons on appropriate spill pallets.
Arnulfo Bedolla, Forklift Driver – Welding, 1st Shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution, position oil/chemical containers =>55 gallons on appropriate spill pallets.
Jim Schwenn, Welding Supervisor, 1st Shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution
Joe Byrdak, Maintenance Supervisor, 1st Shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution, position oil/chemical containers =>55 gallons on appropriate spill pallets, connect/disconnect oil-feed piping system to 330 gallon IBCs, when replacing an empty IBC container.
Juan Sanchez-Maintenance Technicians 1st shift and Matt Byrdak-Process Technician 1st	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution, position oil/chemical containers =>55 gallons on appropriate spill pallets, connect/disconnect oil-feed piping system to 330 gallon IBCs, when replacing an empty IBC container.

Antonio Mendoza, Production Supervisor/Safety, 2nd shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution.
Ricardo Gaona, Welding Supervisor, 2 nd shift	Help implement SWPPP plan details: participate in training/drills, help clean-up spills using absorbents to prevent a release, help prevent stormwater pollution.
Timothy Cruickshank, ISO/IATF Manager, 1 st shift	Co-Inspector for Quarterly Visual Assessments and Routine Facility Inspection. Document, implement, maintain SWPPP plan and Stormwater Permit. Conduct training/drills. Participate in clean-up if needed. Notify National Response Center immediately after a qualifying release into the environment (U.S. waters, storm sewer, land). Conduct/document quarterly inspections (at a minimum) of ODM grounds to assess stormwater discharges and potential discharges, or risk. Maintain documented findings from inspections and open and coordinate corrective actions to address an unauthorized release or discharge, or to lessen risk. PRIMARY SWPPP CONTACT.
Brandon Enright, Plant Manager, 1 st Shift	Conduct training and drills. Participate in clean-up if needed. To coordinate the maintenance of sufficient spill containment (spill pallets), absorbent materials (absorbent pads), or other equipment necessary to help prevent or clean up spills and leaks, and prevent the release of oil and hazardous substances from polluting the environment via stormwater. Serves as the BACK-UP SWPPP CONTACT.
Emily Johnsen, ISO/IATF Assistant, 1 st Shift	Backup, or Co-Inspector for Quarterly Visual Assessments and Routine Facility Inspection
EXTRA SPOT	EXTRA SPOT

1.4 Site Description.

Instructions (see 2015 MSGP Part 5.2.2):

Provide a general description of the "industrial activities" conducted at your facility. For the MSGP industrial activities consist of: manufacturing and processing; material handling activities including storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, by-product or waste product; and vehicle and equipment fueling, maintenance and cleaning.

Industrial activities may occur at any of the following areas (list not exhaustive): industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater.

EPA recommends that you differentiate activities that occur indoors from those that occur outdoors and could be exposed to stormwater, or under cover but that could be exposed to run-on. Don't overlook processes that are vented and may contribute pollutants to the roof.

INDOORS: The manufacture of metal stamping & welding of metal-stamped components. Maintenance of dies, stamping machines, welders and other necessary auxiliary equipment. Some washing of product. Material Handling activities involve the moving & storage of raw materials, equipment, components and finished product to and from production lines, via forklift. Moving and storage of equipment, chemicals and oils to safety, away from traffic and moving equipment. Both SHIPPING AND RECEIVING docks are located inside and under cover at the transfer point, with the open end ONLY at dock entry, with the loading/unloading of goods being performed at the opposite end (of the open end), over 100 feet away via a back-pitched surface, to the goods transfer point surrounded by a covered roof and walls. Part of processing activity includes the generation of waste oils or other liquid chemical wastes, disposed of thru ODM vendors responsible for final disposal or recycling.

OUTDOOR activity: Material handling activities where ODM may move (via forklift) and store material handling equipment (steel or plastic shipping containers used to hold product) on paved ground or loose gravel outside, or outside on steel shelving, in a small industrial yard.

Other OUTDOOR activity occurs at a ground level dock facing East Ave, some cleaning of equipment or forklift maintenance may occur on pavement outside the dock door. At same general location is the delivery and outside storage of propane tanks used for the operation of propane-powered forklifts.

COMBINED INDOOR AND OUTDOOR activities include: Excess steel trim scrap (with process oil) is built up and maintained in an OUTDOOR scrap bin (from indoor scrap bins of much smaller size that need dumping via forklift). Also feeding into the OUTDOOR scrap bin is an elevated direct feed conveyor system from our high-volume 1500-ton press, with the conveyor belt carrying trim scrap thru an outer wall and extending outside approximately 10 feet to a vertical chute, where the scrap falls into a much larger scrap bin below. Once the outdoor scrap bins are full or near full, they are taken away and replaced (DAILY) by a vendor contracted by ODM to responsibly recycle the steel and oil that accumulates at the bottom of the bin.

OTHER COMBINED INDOOR AND OUTDOOR activities include: Removal of waste oils, from temporary INDOOR storage bins/barrels/pit to the vendor's tanker truck sitting outside the nearest doorway. Via the vacuum system on the truck's tank, and with inter-connected hoses extending from the truck tank thru the nearest doorway to the ODM INDOOR waste storage bin, the waste is sucked into the trucks tank OUTDOORS.

1.5 General Location Map.

Instructions (see 2015 MSGP Part 5.2.2):

Provide a general location map (e.g., U.S. Geological Survey (USGS) quadrangle map or aerial image from the internet) with enough detail to identify the location of your facility and all receiving waters for your stormwater discharges (include as Attachment A of this SWPPP Template).

The general location map for this facility can be found in Attachment A.

1.6 Site Map.

Instructions (see 2015 MSGP Part 5.2.2):

Prepare a site map showing the following information. The site map will be included as Attachment B of the finished SWPPP.

- Boundaries of the property and the size of the property in acres;
- Location and extent of significant structures and impervious surfaces;
- Directions of stormwater flow (use arrows);
- Locations of all stormwater control measures;
- Locations of all receiving waters, including wetlands, in the immediate vicinity of your facility. Indicate which waterbodies are listed as impaired and which are identified by your state, tribe or EPA as Tier 2, Tier 2.5, or Tier 3 waters;
- Locations of all stormwater conveyances including ditches, pipes and swales;
- Locations of potential pollutant sources identified under Part 5.2.3.2;
- Locations where significant spills or leaks identified under Part 5.2.3.3 have occurred;
- Locations of all stormwater monitoring points;
- Locations of stormwater inlets and discharge points, with a unique identification code for each discharge point (e.g., Discharge points001, 002), indicating if you are treating one or more discharge points as "substantially identical" under Parts 3.2.3, 5.2.5.3, and 6.1.1, and an approximate outline of the areas draining to each discharge point;
- If applicable, MS4s and where your stormwater discharges to them;
- Areas of designated critical habitat for endangered or threatened species, if applicable.
- Locations of the following activities where such activities are exposed to precipitation:
 - fueling stations;
 - vehicle and equipment maintenance and/or cleaning areas;
 - loading/unloading areas;
 - locations used for the treatment, storage or disposal of wastes;
 - liquid storage tanks;
 - processing and storage areas;
 - immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
 - transfer areas for substances in bulk;
 - machinery; and
 - locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants.

The site map for this facility can be found in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES.

Section 2 will describe all areas at your facility where industrial materials or activities are exposed to stormwater or from which allowable non-stormwater discharges originate. Industrial materials or activities include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; industrial production and processes; and intermediate products, by-products, final products, and waste

products. Material handling activities include, but are not limited to: the storage, loading and unloading, transportation, disposal or conveyance of any raw material, intermediate product, final product or waste product. For structures located in areas of industrial activity, you must be aware that the structures themselves are potential sources of pollutants. This could occur, for example, when metals such as aluminum or copper are leached from the structures as a result of acid rain.

For each area identified, the SWPPP must include industrial activities, potential pollutants, spills and leaks, unauthorized non-stormwater discharges, salt storage, stormwater sampling data and descriptions of control measures.

2.1 Potential Pollutants Associated with Industrial Activity.

Instructions (see 2015 MSGP Parts 5.2.3.1 and 5.2.3.2):
 For the industrial activities identified in section 1.4 above, list the potential pollutants or pollutant constituents (e.g., motor oil, fuel, battery acid, and cleaning solvents).
 In your list of pollutants associated with your industrial activities, include all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the three years prior to the date you prepare your SWPPP.

Industrial Activity	Associated Pollutants
Oily steel scrap generated indoors and disposed of into an outdoor steel bin via conveyor belt to steel chute, then falls into bin-Outdoor bin has open top. Inside same bin, oil drips off scrap & accumulates at bottom, but bins DO NOT leak. Bin is then removed off-site by contractor, who then recycles steel + oil. Oil can drip to paved surface below (from conveyor belt) & mix with storm water. Steel conveyor structure + drop chute is exposed to stormwater, rust and paint can leach off and mix with stormwater. Area affected is East side of ODM property, East of building.	Non-hazardous, emulsifiable mineral oil, with steel shavings from metal stamping process. Excess steel trim scrap. Ferric Oxide (rust from steel) Chromium Oxide (from stainless steel) Paints of unknown composition of binders and solvents.
Material handling activities – Empty steel cages (painted) and plastic bins or totes used to hold or transport product are stacked and stored outside, unprotected from weather. Mineral oil can drip from them onto paved or gravel surface below & mix with storm water. Exposure to weather over time can corrode steel and stainless steel (causing ferric oxide or chromium oxide) and cause paint and oxides to leach off the steel surface due to acid rain, then mixing with stormwater. Areas affected are ODM property North and West of building.	Mineral Oil (Non-hazardous, emulsifiable). Ferric Oxide. Chromium Oxide. Paints from equipment, of unknown composition of binders and solvents.
Material handling activities – Empty plastic and wood skids used to carry product are piled and	Mineral Oil (Non-hazardous, emulsifiable).

<p>stored outside, unprotected from weather. These material handling components may have oily residue that will leach off into stormwater. Area affected is the West side of building.</p>	
<p>Material handling activities - Forklifts are used to move cages, bins, skids, etc. to and from outside storage. May be exposed to precipitation in the process, may leak motor oil or acid from battery. Areas affected are the East and West sides of building, Shipping and Receiving docks, and ground level dock on west side.</p>	<p>Motor Oil from forklifts, composed of: Heavy paraffinic distillates (5%) Tetrapropenyl Phenol (1%)</p> <p>Sulfuric Acid from lead-acid battery.</p>
<p>Hazardous waste handling – Waste oils and solvents are taken from inside the walls of ODM by a contractor. By using an industrial vacuum system with inter-connected hoses, the contractor vacuums waste oil from ODM internal drums, from an internal pit, and other internal containers, into a truck tank parked outdoors nearby. The vacuum hose could break free from the truck during operation if not properly attached and locked, spilling waste oil on the ground outside the building. Inter-connected hoses could become disconnected from each other during operation if not connected and locked properly, spilling waste oil on the ground inside or outside the building.</p>	<p>Dirty Emulsifiable mineral oil, with steel shavings from stamping process. Dirty water soluble organic soap-non-hazardous. Dirty water, contaminated w/ pollutants listed here. Dirty used motor oil: Heavy Paraffinic distillates, + Tetrapropenyl Phenol. Dirty Petroleum Hydrocarbon Dirty Alkaline Cleaner – Sodium Metasilicate Tiny steel shavings from the stamping process, in small amounts and invisible to the naked eye, are likely to be found within these waste chemicals, or pollutants, and would likely include trace amounts of:</p> <ul style="list-style-type: none"> Carbon Chromium Copper Manganese Phosphorus Molybdenum Sulfur Aluminum Silicon Titanium Niobium Vanadium Tin Nickel Calcium Boron
<p>Material handling activity – Use of the company-owned “box” truck, used to transport product to and from Warehouse in neighboring town of Countryside. Fuel tank could potentially leak, Motor could potentially leak oil.</p>	<p>Fuel Motor Oil</p>

[Repeat as necessary]

[Repeat as necessary]

2.2 Spills and Leaks.

Instructions (See 2015 MSGP Part 5.2.3.3):

Include the following in this section:

- **Potential spills and leaks:** A description of where potential spills and leaks could occur at your site that could contribute pollutants to your stormwater discharge, and specify which discharge points are likely to be affected by such spills and leaks.
- **Past spills and leaks:** A description of significant spills and leaks in the past three years of oil or toxic or hazardous substances that actually occurred at exposed areas, or that drained to a stormwater conveyance.

Note: Significant spills and leaks include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under CWA Section 311 (see 40 CFR 110.6 and 40 CFR 117.21) or Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC §9602.

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Discharge Points
East parking lot, from steel scrap bins or over-head conveyor system, to nearby storm sewer, area designated "B" on site map.	Des Plaines River, via MS4 on East Ave
Receiving dock, East side of building, to nearby storm sewer, area designated with "B" on site map.	Des Plaines River, via MS4 on East Ave
West side of building at ground-level dock, plus immediately surrounding areas designated with "B" on site map.	Des Plaines River, via MS4 on East Ave
South side of building, facing Joliet Road, near corner of Joliet Road and East Ave, 2 outfalls of stormwater from roof released onto grassy area.	Des Plaines River, via MS4 on Joliet Road

Description of Past Spills/Leaks

Date	Description	Discharge Points
NONE	NONE	NONE

2.3 Unauthorized Non-stormwater Discharges Documentation.

Instructions (see 2015 MSGP Part 5.2.3.4):

Part 1.1.3 of the 2015 MSGP identifies allowable non-stormwater discharges. The questions below require you to provide documentation of the following:

- Evaluation for the presence of unauthorized non-stormwater discharges at your site; and
- Elimination of any unauthorized non-stormwater discharges.

Description of this facility's unauthorized non-stormwater discharge evaluation:

- Date of evaluation: **February 23, 2020**
- Description of the evaluation criteria used: **To conduct a visual inspection to determine whether any areas around, or inside the perimeter of the ODM property line, or the grounds of the flat roof, are taking on waste or otherwise unauthorized non-stormwater discharge. The evaluator is Timothy Cruickshank, an experienced inspector of hazardous material tanks and Lead Internal Auditor of ISO 14001 Environmental Management Systems. The evaluator walked the entire property line, and points in-between, to inspect for the presence of unauthorized non-stormwater discharge. All areas of the flat roof were also inspected. The inspector was looking for unknown containers or chemicals, evidence of stains, oil or residue where a discharge to ODM property may have occurred, unusual smell, changes or damage to landscaping, or any other such unauthorized discharge to ODM grounds. There was no evidence of unauthorized discharge and therefore no actions were taken.**
- List of the drainage points that were directly observed during the evaluation: **On ODM grounds in the East parking lot, there are 2 stormwater sewer drains. Also verified on the East side was whether large scrap bins were leaking oil – THEY WERE NOT. The ODM facility is on a corner lot, where 2 busy streets cross (Joliet Road and East Ave). Facing East Ave, there are 2 stormwater sewers at the curb next to ODM, and facing Joliet Road there are 2 more stormwater sewer drains. North property line with small grassy area. West side of building, from building to property line. All were evaluated for unauthorized discharge – NONE FOUND.**
- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), or documentation that a separate NPDES permit was obtained. For example, a floor drain was sealed, a sink drain was re-routed to the sanitary sewer or an NPDES permit application was submitted for an unauthorized cooling water discharge: **No actions taken.**

2.4 Salt Storage.

Instructions (see 2015 MSGP Part 5.2.3.5):

Document the location of any storage piles containing salt used for deicing or other commercial or industrial purposes.

Note: you will be asked additional questions concerning salt storage in Section 3.1.7 of this SWPPP template, below.

There is **NO** salt storage for de-icing on the outside of the building. Bagged salt for de-icing is maintained inside the building at the area(s) designated with an "S" on the location "site map" (see key on site map).

2.5 Sampling Data Summary.

Instructions (See 2015 MSGP Part 5.2.3.6):

Summarize all stormwater sampling data collected from your permitted discharge points during the previous permit term. Include a narrative description that summarizes the collected data to support identification of potential pollution sources. Note that data tables and/or figures may be used to aid the summary.

See information in table below:

Discharge Point	Minerals found	Potential Pollution Sources
E	Aluminum, Calcium, Iron, Magnesium, Zinc	Leaching from galvanized gutters & downspouts, air conditioning equipment boxes, product containers-steel, coated or painted baskets, scrap container sitting on outside ground, settled dust from industrial activity (metal Stamping), delivery vehicle traffic, steel/other scrap on ground, automobiles in nearby parking spots, outside garbage container & compactor, steel painted recycle containers sitting outside, acid rain.
SE	Same	Same
SW	Same	Same
W	Same	Same
N	Same	Same

SECTION 3: STORMWATER CONTROL MEASURES.

Instructions (See 2015 MSGP Parts 2.1.2, Part 8, and 5.2.4):

In Sections 3.1 - 3.11 of this SWPPP template, you are asked to describe the stormwater control measures that you have installed at your site to meet each of the permit's

- Non-numeric technology-based effluent limits in Part 2.1.2;
- Applicable numeric effluent limitations guidelines-based limits in Part 2.1.3 and Part 8;
- Water quality-based effluent limits in Part 2.2;
- Any additional measures that formed the basis of eligibility regarding threatened and endangered species, historic properties, and/or federal CERCLA site requirements in Part 2.3; and
- Applicable effluent limits in Parts 8 and 9.

In addition to your control measure descriptions, include explanations of how the controls fulfill the following requirements (see 2015 MSGP Part 2.1.1):

- The selection and design considerations; and
- How they address the pollutant sources identified in section 2.1 of the Template.

3.1 Non-numeric Technology-based Effluent Limits (BPT/BAT/BCT)

You must comply with the following non-numeric effluent limits (except where otherwise specified in Part 8) as well as any sector-specific non-numeric effluent limits in Part 8.

3.1.1 Minimize Exposure.

Instructions (see 2015 MSGP Part 2.1.2.1):

Describe any structural controls or practices used to minimize the exposure of industrial activities to rain, snow, snowmelt and runoff. Describe where the controls or practices are being implemented at your site.

Weather exposure to the processes of shipping and receiving is minimized by storm-resistant cover (side walls and roof). Both docks are pitched backwards so that, in case of a spill, a discharge is less likely. No outside processing is conducted at ODM. There are no fueling stations at ODM. ODM is surrounded by curbing (except for access to roads) to help prevent contaminated flow run-off. Clean-up materials are maintained in-house (absorbents) to quickly prevent the discharge of pollutants. Spill overflow equipment is maintained inside the building at areas where there is risk. The ODM delivery truck is stored indoors when not in use to help contain any leaks, or prevent mixing with stormwater. The truck is also serviced on a regular basis, to eliminate leaks. Though it was done in the past, and listed above, cleaning equipment outdoors is no longer allowed.

3.1.2 Good Housekeeping.

Instructions (see 2015 MSGP Parts 2.1.2.2 and 5.2.5.1):

Describe any practices you are implementing to keep exposed areas of your site clean. Describe where each practice is being implemented at your site. Include here your schedule for: (1) regular pickup and disposal of waste materials, and (2) routine inspections for leaks and of the condition of drums, tanks and containers. Note: There are specific requirements for facilities that handle pre-production plastic.

General Garbage pick-up: As needed (approximately monthly)

Recycle Materials pick-up: Twice per week (Wed/Fri)

Excess steel scrap pick-up: Daily on production days.

Part storage bins, totes and skids are neatly stacked outdoors to conserve space. Containers with oil or oily residue inside are covered to prevent mixing with, or contaminating stormwater.

At a minimum of quarterly, a team of knowledgeable personnel coordinated by the Plant Manager conduct a safety/5S tour of the plant assessing for cleanliness and organization, safety, leaks and spills, areas of risk. Areas needing attention are written up and resolved with corrective action.

ODM has a SPCC Plan in place, and the plan author or trained assistant conducts monthly inspections of oil and chemical containers to assess for leaks or potential leaks and the condition of drums, tanks and containers. If and when leaks are found, the Stormwater Pollution Prevention Team will be notified to clean-up the spill, and/or cap it if necessary. Where containers are found to be high risk during SPCC Monthly Inspections, such containers are closely monitored by the SPCC inspectors until such time that the container is empty or replaced. SPCC non-conformances are fixed through the corrective action process.

3.1.3 Maintenance.

Instructions (see 2015 MSGP Parts 2.1.2.3 and 5.2.5.1):

Describe procedures (1) to maintain industrial equipment so that spills/leaks are avoided and (2) to keep control measures in effective operating condition. Include the schedule you will follow for such maintenance activities. Describe where each applicable procedure is being implemented at the site.

All key equipment industrial equipment containing oil or other hazardous chemicals are on a preventive maintenance schedule, to help prevent or detect leaks or spills. Such equipment receives a documented MONTHLY "preventive maintenance" or "PM" check, AT IT'S REGULAR LOCATION, and includes the replacement of any worn parts and a predictive maintenance check on the main motor. The main motor is checked during its regular use with a calibrated temperature gun, to monitor whether motor temp is rising towards over-heating, leading to potential chemical spill. Such "PMs" are verified to be done and their on-time frequency % reported to top management quarterly.

3.1.4 Spill Prevention and Response.

Instructions (see 2015 MSGP Parts 2.1.2.4 and 5.2.5.1):

Describe any structural controls or procedures used to minimize the potential for leaks, spills and other releases. You must implement the following at a minimum:

- Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;*
- Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas;
- Develop training and train all staff on procedures to quickly stop, contain and clean up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible;
- Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made; and
- Notify appropriate facility personnel when a leak, spill or other release occurs.

Describe where each control is to be located or where applicable procedures will be implemented.

Note: some facilities may be required to develop a Spill Prevention Control and Countermeasure (SPCC) plan under a separate regulatory program (40 CFR 112). If you are required to develop an SPCC plan, or you already have one, you should include references to the relevant requirements from your plan.

EPA recommends you include:

Where a leak, spill or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302 occurs during a 24-hour period, you must notify the National Response Center (NRC) at (800) 424-8802 or, in the Washington, DC, metropolitan area, call (202) 267-2675 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. State or local requirements may necessitate reporting spills or discharges to local emergency response, public health, or drinking water supply agencies. Contact information must be in locations that are readily accessible and available.

Controls used by ODM to minimize the potential for leaks, spills and other releases include having an SPCC Plan in place, Monthly Preventive Maintenance of oil-containing equipment described in the previous section (3.1.3), conduct quarterly (minimum) Safety/5S tours, and daily housekeeping activities to minimize the potential for leaks, spills and other releases.

All oil and chemical containers of =>55-gallons have secondary containment in place (to hold up to a worst case leak from a single container). ALSO, there is sufficient spill pads in the building to handle a worst case spill of 330 gallons, should the spill occur prior to it sitting on the secondary containment spill pallet. A waste container holding oil-soaked rags and pads has been provided.

Monthly SPCC inspections use methods required by the current SP001 Standard for the Inspection of Aboveground Storage Tanks guidelines, by the Steel Tank Institute (STI).

All "used oil" and "spent solvent" containers susceptible to spillage or leakage are marked as to their contents. Users of such containers are properly trained on the proper usage of such containers and associated pumps or faucets or valves, to prevent or minimize spillage. Should a spill occur, all employee witnesses are trained to immediately notify their supervisor or Stormwater Pollution Prevention Team member, or to "page" a team member. All employees are made aware of Stormwater Pollution Prevention Team members. Supervisors notified of spills will immediately inform 1 or more members of the Stormwater Pollution Prevention Team.

Material handlers are trained on the safe handling and storage of hazardous materials, including the use of secondary containment and barriers between material storage and traffic areas, how to initiate the cleanup of a spill to prevent its release (to the environment), and to notify a Stormwater Pollution Prevention Team member via page, phone call or personal contact. Stormwater Pollution Prevention Team members are trained in the clean-up of hazardous spills and the use of secondary containment and applicable absorbents for spill clean-up. During training of the Team by the SWPPP Coordinator, there was a drill where real used oil was spilled on the ground and the team had to clean it up using absorbent pads.

Mobile spill kits or absorbent materials are maintained on-site at specific areas where leaks or spills of hazardous substances are most likely to take place.

It is the responsibility of the ODM SWPPP Coordinator (ISO/IATF Manager Tim Cruickshank) to notify the National Response Center (NRC) by telephone at 800-424-8802 immediately after having knowledge that a hazardous substance or oil in an amount equal to or greater than a reportable quantity established by 40 cfr part 110, 40 cfr part 117, or 40 cfr part 302, during a 24 hour period, has released into the environment or storm sewer. Where necessary, state or local authorities will also be contacted.

3.1.5 Erosion and Sediment Controls.

Instructions (see 2015 MSGP Parts 2.1.2.5 and 5.2.5.1):

Describe activities and processes for stabilizing exposed soils to minimize erosion. Describe flow velocity dissipation devices placed at all discharge locations and all structural and non-structural control measures to prevent the discharge of sediment. If applicable, describe the type and purpose of any polymers and/or chemical treatments used to control erosion and the location at your site where each control is implemented.

There are 2 areas of external stormwater discharge (from the roof) at ODM. For 11 other areas with internal inlets from the roof (marked with green dots on the ODM site map), there is piping from an opening in the flat roof that drops down and through the floor, and draining into the sanitary sewer pipes below ground level, ELIMINATING most erosion. The 2 external discharges come from other openings in the flat

roof with piping that extends down inside the roof, then piping extends horizontally towards the South front of building (facing Joliet Road), with piping then extends vertically down near the base of the floor and out thru the wall where stormwater falls onto a grassy area where it naturally seeps into the soil or runs-off into the street and down the storm sewer. These 2 sites of discharge cause minimal erosion, as they are thick grassy areas. Flow velocity is dissipated by having a rather large pipe of 8" diameter opening at each end, with constant natural drainage. There is no funneling effect (taking in water from a much larger opening to then release from a smaller opening) that would increase flow velocity, minimizing the effect of any erosion, which is very minor, if any. No industrial activity takes place on the roof which may cause sediment.

There are no industrial pollutants or materials maintained on the roof, so sediment is minimal,

3.1.6 Management of Runoff.

Instructions (See 2015 MSGP Part 2.1.2.6):

Describe controls used at your site to divert, infiltrate, reuse, contain or otherwise reduce stormwater runoff. Describe the location at your site where each control is implemented.

Here at ODM, we divert and reduce stormwater run-off by means explained in the previous section, 3.1.5. One half of our stormwater drainage that comes from the roof is diverted internally into the sanitary sewer system. Where the stormwater run-off does occur, it is done in a thick grassy area, helping to minimize erosion and promoting grass growth. The thick grass helps to absorb the force of the stormwater run-off, helping to minimize erosion.

3.1.7 Salt Storage Piles or Piles Containing Salt.

Instructions (see 2015 MSGP Part 2.1.2.7):

If applicable, describe structures at your site that either cover or enclose salt storage piles or piles containing salt, and any controls that minimize or prevent the discharge of stormwater from such piles. Also, describe any controls or procedures used to minimize exposure resulting from adding to or removing materials from the pile. Describe the location at your site where each control and/or procedure is implemented.

There are no salt storage piles or piles containing salt outdoors at ODM. There are no salt piles indoors either at ODM. There is, however, bags of salt stored indoors surrounded by all walls and roof, at the location(s) marked with "S" on the ODM Site Location map, for the purpose of de-icing.

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials.

Instructions (see 2015 MSGP Part 2.1.2.10):

Describe controls and procedures that will be used at your site to minimize generation of dust and off-site tracking of raw, final or waste materials in order to minimize pollutant discharges.

Non-hazardous mineral oil is sprayed on the metal prior to stamping as part of the process, NOT for the purpose of preventing dust but that is in-fact, a result of oiling prior to hit by the die. Also, sections of the building where metal stamping occurs are sealed off by over-head doors, that automatically open and close for foot traffic and fork lifts to come and go. Inside the building, there is an air filtration system installed that sucks in smoke generated by the welding & stamping process, to filter the air of smoke, dust and impurities.

Regarding off-site tracking of raw or waste materials in order to minimize pollutant discharges, ODM waste materials (oils, excess raw material scrap, solvents) are recycled by vendors, thereby eliminating those waste materials from ending up as pollutants.

3.2 Sector-Specific Non-Numeric Effluent Limits.

Instructions (see 2015 MSGP Part 8):
 Describe any controls or procedures that will be used at your site to comply with any sector-specific requirements that apply to you in Part 8 of the 2015 MSGP. Describe the location at your site where each control and/or procedure will be implemented.
Note: Sector-specific effluent limits apply to Sectors A, E, F, G, H, I, J, L, M, N, O, P, Q, R, S, T, U, V, X, Y, Z and AA.

Chemical containers, floors and outside storage equipment is maintained neat and orderly, and kept as dry as possible. When cleaning takes place, dry cleanup techniques are used whenever possible, wiping equipment down with absorbent pads or rags.

Raw steel material has a dedicated storage area so that it is out of the way so as not to impede appropriate and timely response to spills and leaks. Metal fabricating areas are maintained as clean and dry from oil as possible with rags and oil drip pads.

To reduce the risk of their exposure to stormwater, chemicals- including paints and metal working fluids, are safely stored indoors in a yellow fireproof cabinet. Such chemicals are only removed from the cabinet when in-use, then returned to the cabinet.

Lubricating oil and hydraulic fluids are also used indoors only and stored away from exit doors and storm sewers, with secondary containment, to help prevent stormwater contamination.

Oil or chemical soaked absorbent pads or rags are placed in a waste container, that is later taken by our oil waste recycling company (Beaver Oil) for responsible disposal, cleaning or recycle.

SPCC spill procedures, with a trained spill response team, helps to minimize the risk of leaks or spills contaminating stormwater.

Special attention is given to containment of the following substances to prevent contamination of stormwater: Chromium, copper, toluene, sulfuric acid, zinc, lead, mercury, aluminum, iron.

3.3 Numeric Effluent Limitations Based on Effluent Limitations Guidelines.

Instructions (see 2015 MSGP Part 2.1.3):
 If you are in an industrial category subject to one of the effluent limitations guidelines identified in the table below (Table 2-1 of the 2015 MSGP), describe controls or procedures that will be implemented at your site to meet these effluent limitations guidelines.

Not Applicable to ODM.

Regulated Activity	40 CFR Part/Subpart	Effluent Limit
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	Part 429, Subpart I	See Part 8.A.7

Regulated Activity	40 CFR Part/Subpart	Effluent Limit
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	Part 418, Subpart A	See Part 8.C.4
Runoff from asphalt emulsion facilities	Part 443, Subpart A	See Part 8.D.4
Runoff from material storage piles at cement manufacturing facilities	Part 411, Subpart C	See Part 8.E.5
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	Part 436, Subparts B, C, or D	See Part 8.J.9
Runoff from hazardous waste landfills	Part 445, Subpart A	See Part 8.K.6
Runoff from non-hazardous waste landfills	Part 445, Subpart B	See Part 8.L.10
Runoff from coal storage piles at steam electric generating facilities	Part 423	See Part 8.O.8
Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	Part 449	See Part 8.S.8

3.4 Water Quality-based Effluent Limitations and Water Quality Standards.

Instructions (see 2015 MSGP Part 2.2.1):

Describe the measures that will be implemented at your site to control industrial stormwater discharge as necessary to meet applicable water quality standards of all affected states (i.e., your discharge must not cause or contribute to an exceedance of applicable water quality standards in any affected state).

EPA expects that compliance with the conditions in this permit will control discharges as necessary to meet applicable water quality standards. If at any time you become aware, or EPA determines, that your discharge does not meet applicable water quality standards, you must take corrective action(s) as required in Part 4.1 of the 2015 MSGP and document the corrective actions as required in Part 4.3 of the 2015 MSGP. You must also comply with any additional requirements required by your state or tribe.

EPA may also require that you undertake additional control measures (to meet the narrative water quality-based effluent limit above) on a site-specific basis, or require you to obtain coverage under an individual permit, if information in your NOI, required reports, or from other sources indicates that your discharges are not controlled as necessary to meet applicable water quality standards. You must implement all measures necessary to be consistent with an available wasteload allocation in an EPA-established or approved TMDL.

ODM will follow the control measures laid out in this SWPPP to control its industrial stormwater discharge as necessary to meet applicable water standards of Illinois. Material handling equipment (skids, totes, containers) are wiped off of excess dirt/oil before placement in outdoor storage. ODM avoids the potential discharge of toxic substances such as Mercury (light tubes and other mercury containing equipment is recycled), Cadmium (Ni-Cad batteries where used, are recycled), ODM avoids usage of raw materials or other materials containing lead or hexavalent chromium, with the exception of lead in lead-acid batteries. Lead-acid batteries are recycled after use. ODM currently certified to the ISO 14001 environmental standard, which will encourage decreased risk and overall continuous improvement of the Environmental Management System here to prevent pollution. Toxic chemicals and those harmful to the environment are avoided from purchase or usage, thereby avoiding discharge/disposal of toxic waste.

SECTION 4: SCHEDULES AND PROCEDURES.

4.1 *Good Housekeeping.*

Instructions (see 2015 MSGP Part 5.2.5.1):

Document a schedule or the process used for determining when pickup and disposal of waste materials occurs (e.g., roll off dumpsters are collected when full). Provide a schedule for routine inspections for leaks and conditions of drums, tanks and containers.

At ODM, roll-off garbage dumpsters are picked up twice weekly whether full or not.

Roll-off recycle dumpster (of used paper, plastic, aluminum, etc.) is collected once weekly whether full or not.

As part of ODM's SPCC program, oil-containing drums, tanks and containers are inspected MONTHLY, per the guidelines of the inspection standard SP001, A Standard for the Inspection of Aboveground Storage Tanks, by the Steel Tank Institute (STI). INCLUDED in this inspection are the oil-containing steel scrap bins maintained outdoors, in addition to oil-containing drums, tanks and other qualifying oil-containing equipment.

At a minimum of quarterly, qualifying personnel conduct an inspection of safety and cleanliness (aka 5S) and part of this inspection addresses spills or leaks of oil or other chemical substances. Any such spills or leaks found during this inspection are reported to the applicable department Supervisor or Manager, whose job is to coordinate immediate clean-up.

Undocumented informal inspections for safety and cleanliness (including spills or leaks) at locations of risk take place every day by various members of ODM staff, including the President of the company. When spills or leaks are found during such informal inspections they are communicated to those responsible and addressed in the same manner as directly above (see previous paragraph).

An annual Spring cleaning is conducted outdoors to remove litter, steel scrap or excess dirt that may have blown onto ODM grounds, then additional outdoor clean-ups are performed as needed.

4.2 *Maintenance.*

Instructions (see 2015 MSGP Part 5.2.5.1):

Document preventative maintenance procedures, including regular inspections, testing, maintenance and repair of all control measures to avoid situations that may result in leaks, spills, and other releases, and any back-up practices in place should a runoff event occur while a control measure is off-line. Include the schedule or frequency for maintaining all control measures used to comply with the effluent limits in Part 2 of the 2015 MSGP.

ODM's SPCC program includes **monthly and annual inspections** of all oil or oil containing equipment holding 55 gallons or more. Included in the inspection are solvent containers of the same quantity, and any outside scrap bins containing quantities of any amount of steel scrap + associated oil at the bottom of the bin. Any leaks or spills would be reported by the inspector to the applicable dept. supervisor and ODM Stormwater Pollution Prevention Team. **Monthly preventative maintenance** is performed and documented for all oil-containing machinery that produces ODM product, and their associated motors are monitored to prevent over-heating that could result in a blown motor with resulting oil or other hazardous chemical spill. Other key production associated equipment is also checked monthly (compressors, air filtration system,

heating and cooling equipment, etc.). The ODM building is staffed 24 hours per day, and it is more than likely that any significant leak or spill of hazardous chemical would be seen and reported to the Stormwater Pollution Prevention Team, the team of individuals on each shift responsible for spill clean-up. During some weekends and holidays the building is not staffed. Prior to shutting down for these periods, an inspection is made by the Supervisor in charge of shutdown to determine whether all areas of the building are under control and free of significant leaks or spills. IF NOT, that supervisor is obligated to call the Maintenance Supervisor to report the problem, which would then be mitigated by the Maintenance Supervisor.

Back-up practices in place should a run-off event occur while a control measure is off-line, include the following: A team of trained individuals on each shift (2 shifts) is in place to contain and clean-up any spill or leak that may take place on ODM grounds, up to and slightly above our worst-case scenario single spill of 330 gallons of oil or solvent, to prevent a release into the environment. Such a spill or leak could happen while moving a container of hazardous liquid material (oil or soap/solvent). Once containers are in their intended spot for in-process use, they are placed on spill pallets capable of holding the entire contents of any one container should a leak occur. In addition to spill pallets/containers, ODM maintains sufficient absorbent pads to soak up a spill or leak from 1 through at least 350 gallons minimum. Should a spill or leak occur beyond our capability to contain and clean it, ODM would utilize an outside contractor to help or take over clean-up. AT TIMES WHEN THE PLANT OR BUILDING IS NOT STAFFED AND THERE IS A RUNOFF EVENT, OR POTENTIAL RUNOFF, THE FOLLOWING BACKUP SYSTEM IS IN PLACE TO HELP PREVENT SUCH AN OCCURRENCE: Once containers are placed in their intended spot, they are set on spill pallets capable of holding the entire contents of any one container should a leak occur while the building is not staffed. These backup spill pallets are checked for the existence of a leak during the monthly SPCC inspections, and if so, the container would be identified for replacement. In such a case where the backup spill pallet has contents, then our oil waste recycling company (Beaver Oil) would be notified by the SWPPP Coordinator.

Quarterly Routine Facility Inspections are conducted by the SWPPP Primary Contact, or his SWPPP trained assistant, to help determine and assess the presence of any internal or external risk factors at ODM that could contribute to the contamination of stormwater.

Quarterly Visual Assessments are conducted by the SWPPP Primary Contact or his SWPPP trained assistant, to assess the condition of stormwater samples collected.

4.3 Spill Prevention and Response Procedures.

Instructions (see 2015 MSGP Part 5.2.5.1):

Document procedures for preventing and responding to spills and leaks, including notification procedures. For preventing spills, include control measures for material handling and storage, and the procedures for preventing spills that can contaminate stormwater. Also specify cleanup equipment, procedures and spill logs, as appropriate, in the event of spills. You may reference the existence of other plans for Spill Prevention Control and Countermeasure (SPCC) developed for the facility under Section 311 of the CWA or BMP programs otherwise required by an NPDES permit for the facility.

Maintenance PMs (preventive maintenance), SWPPP inspections, SPCC monthly and annual inspections, Safety/5S Inspections, and other informal checks help to prevent spills and leaks. Oil and solvent containers of 55 gallons or more sit on spill pallets capable to hold the entire contents should one or more

spring a leak, helping to prevent a leak from reaching and passing through an exit door and/or reaching a storm sewer. For leaks or spills up through 350 gallons, the ODM Stormwater Pollution Prevention Team would be activated to stop the leak or spill, contain it, and then clean it up.

Clean-up Equipment on-hand would include absorbent oil pads, capable to soak up to .39 gallons per pad (55-gallon drum requires 141 pads, worst case container of 330 gallons requires 846 pads). We typically maintain 1500 pads or more, in-house at any one time. All 55-gallon and 330-gallon containers of oil/solvent sit on a spill pallet capable to hold one full container. Spill clean-up, using absorbent pads is handled by the Stormwater Pollution Prevention Team, using pads according to need.

ALL employees are trained on who to notify (a spill response team member) if they see or cause an oil or chemical leak. Procedures describing prevention of, or containment and clean-up of significant leaks and spills are the SPCC plan and applicable work instruction (WI8.2EMS) under the ISO 14001 Environmental Management System. **Should a significant spill or leak (1 gallon or greater) occur**, the Stormwater Pollution Prevention Team (see section 4.5 Employee Training for names) would be notified and once notified, they are responsible to stop (if possible), contain and clean-up the spill or leak. If for any reason they cannot contain a leak from spreading outside the immediate area, team members should notify the SWPPP Coordinator immediately, who will then help with the task and may request other internal help. Where there is a release to the environment or storm sewer in quantities stated in previous section 3.4, notifications will be sent to authorities, as detailed in section 3.4 here.

Where a faucet is busted off on a 330-gallon IBC, such IBSs are equipped with a manual shut-off valve to stop the flow.

Spills are recorded on a spill log (form #F8.2EMS) should there be a significant spill or leak clean-up to help prevent a release to stormwater discharge, documented and maintained by the SWPPP Coordinator.

Should a significant leak or spill grow to beyond ODM's capability to effectively respond, the SWPPP Coordinator would immediately contact a qualified contractor capable to clean hazardous chemical spills. Clean Harbor Environmental Services @ 800-645-8265) specializing in the containment and clean-up of hazardous spills released into the environment. Clean Harbor is available to respond 24 hours per day, maintains a full staff and all necessary equipment to contain and clean any leak or spill that ODM may release into the environment.

4.4 Erosion and Sediment Control.

Instructions (see 2015 MSGP Part 5.2.5.1):

Document if polymers and/or other chemical treatments are used for erosion and sediment control and identify the polymers and/or chemicals used and the purpose.

NO polymers or chemical treatments are used for erosion or sediment control – it does not appear to be needed.

4.5 Employee Training.

Instructions (see 2015 MSGP Part 2.1.2.8 and Part 5.2.5.1):

Instructions (see 2015 MSGP Part 2.1.2.8 and 5.2.5.1):

Provide the elements of your training plan, including:

- The content of the training;
- The frequency/schedule of training for employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of the permit.

The following personnel, at a minimum, must receive training, and therefore should be listed out individually in the table below:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges;
- Personnel who are responsible for conducting and documenting monitoring and inspections as required in Parts 3 and 6; and
- Personnel who are responsible for taking and documenting corrective actions as required in Part 4.

2015 MSGP Part 2.1.2.8 requires that the personnel who are required to be trained must also be trained to understand the following if related to the scope of their job duties (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections):

- An overview of what is in the SWPPP;
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- The location of all controls on the site required by this permit, and how they are to be maintained;

CONTENT OF TRAINING (A-level): Annual Training for people responsible for hazardous waste clean-up or the prevention of its release to the environment via stormwater, or are otherwise subject to the requirements necessary to meet the conditions of the permit. The ODM Stormwater Pollution Prevention Team is made up of Frank Quinones-1st shift, Joe Byrdak-1st shift, Juan Sanchez-1st shift, Matt Byrdak-1st shift, Tim Cruickshank-1st shift, Antonio Mendoza-2nd shift, Ricardo Gaona-2nd shift. **Other personnel to be included in the training are those who are responsible for the design, installation, maintenance and/or repair of controls (including pollution prevention measures) would include forklift drivers with responsibility for handling and storage of hazardous materials. INSTRUCTORS:** The training course is given in-house by the SWPPP (Main Contact) Coordinator, and the Back-up SWPPP Contact. The trainers are experienced inspectors of oil tanks and on the use of absorbent materials used for spill clean-up.

1. Lecture training on the chemicals affected, why the training is needed (i.e. hazardous materials and how they contaminate stormwater, how to lessen the risk of oil and/or chemical exposure to stormwater).
2. How to stop, contain and clean-up a spill to help prevent its exposure to stormwater.
3. How to easily calculate the amount of absorbent pads needed for a particular spill (1 pad will soak up to .39 gallons).

4. How to dispose of used absorbent pads, rags or oily or contaminated gloves (container for oil or chemical soaked pads/rags).
5. How to setup "spill pallets" for containers in place and ready to use (55 gallon & 330 gal containers).
6. Stage a mock drill where participants actually use absorbent pads to soak up a substance and have them calculate pads needed based on a 55-gallon or 330-gallon spill (our spill pads are rated by the manufacturer to soak up to .39 gallons of oil per pad).

CONTENT OF TRAINING (B-level): One-time GENERAL TRAINING TO ALL OTHER EMPLOYEES OF ODM AND HOW THEY CAN HELP PREVENT A DISCHARGE TO THE ENVIRONMENT & ENFORCE PERMIT REQUIREMENTS (Trainer – SWPPP Coordinator Tim Cruickshank):

1. Explain the purpose for the Permit and how employees can help fulfill ODM requirements.
2. What is a hazardous material as it relates to stormwater, the Stormwater permit and SWPPP.
3. What to do if you see a leak or spill of a hazardous material.
4. Who is responsible to stop, contain and clean-up a hazardous material spill or leak.

THE FREQUENCY/SCHEDULE OF TRAINING:

A-level training is conducted annually at a minimum for each member. New members are given the course prior to being officially named to the team.

B-level training is conducted one time to ALL existing or new employees, regardless of their role with the company or whether or not they have stormwater permit responsibilities so they are able to recognize a leak or a spill and to know who to notify, if and when they see this condition.

Personnel who are responsible for conducting and documenting monitoring and inspections as required in Parts 3 and 6, this is the SWPPP Coordinator, Tim Cruickshank (ISO 14001 Certified Lead Auditor, with experience conducting inspections of oil and chemical containers using the SP001 Standard for the Inspection of Aboveground Storage Tanks, by the Steel Tank Institute (STI). Back-up inspector is the ISO/IATF Assistant Emily Johnsen.

Personnel who are responsible for taking and documenting corrective actions as required in Part 4, is also the SWPPP Coordinator, Tim Cruickshank, or ISO/IATF Assistant Emily Johnsen.

4.6 Inspections and Assessments.

Instructions (see 2015 MSGP Part 3):

Document procedures for performing the types of inspections specified by this permit, including:

- Routine facility inspections (see Part 3.1) and;
- Quarterly visual assessment of stormwater discharges (see Part 3.2).

Note: If you are invoking the exception for inactive and unstaffed sites proceed to 4.6.3 below.

4.6.1 Routine Facility Inspections.

Instructions (see 2015 MSGP Part 3.1):

Describe the procedures you will follow for conducting routine facility inspections in accordance with Part 3.1 of the 2015 MSGP. Document any findings of your facility inspections and maintain this report with your SWPPP as required in Part 5.5 of the 2015 MSGP. Summarize your findings in the annual report per Part 7.5 of the 2015 MSGP. Any corrective action required as a result of a routine facility inspection must be performed consistent with Part 4 of the 2015 MSGP.

ODM Inspection Procedures are as follows:

At a minimum of once per calendar quarter, the SWPPP Contact/Coordinator Tim Cruickshank, or another trained member of the Stormwater Pollution Prevention Team, or both, will inspect the areas of ODM covered by the requirements of the Multi-Sector General Permit (MSGP) during normal operating hours. The purpose of the inspection being to assess whether:

- Industrial materials, residue or trash that may have, or could come into contact with stormwater;
- There are leaks or spills from industrial equipment, drums, tanks and other containers;
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site (are pick-up & delivery trucks dropping or leaking waste or sediment when they come and go?);
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas;
- Control measures needing replacement, maintenance or repair.

Areas of the facility covered by the requirements of the Multi-sector General Permit and required to be covered by this inspection include, at a minimum:

- Areas where industrial materials or activities are exposed to stormwater (see codes B & C on ODM site map);
- Areas identified in the SWPPP (also see codes B & C on ODM site map) and those that are potential pollutant sources per MSGP 5.2.3;
- Areas where spills and leaks have occurred in the past 3 years;
- Discharge points;
- Control measures used to comply with the effluent limits contained in this permit.

Documentation of Routine Facility Inspections will include:

- The inspection date and Time;
- The name(s) and signature(s) of inspector(s);
- Weather information at the time of the inspection;
- All observations related to the implementation of control measures at ODM, including:
 - A description of any discharge occurring at the time of the inspection;
 - Any previously unidentified discharges from and/or pollutants at the site;
 - Any evidence of, or potential for, pollutants entering the drainage system;
 - Observations regarding the physical condition of and around all outfalls, including any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water;
 - Any control measures needing maintenance, repairs, or replacement.
- Any additional control measures needed to comply with the permit requirements;
- Any incidents of noncompliance;
- A statement, signed and certified in accordance with Appendix B, subsection 11.

For routine facility inspections to be performed at your site, your SWPPP must include a description of the following:

1. **Person(s) or positions of person(s) responsible for inspection.** this is the SWPPP Coordinator and member of the Stormwater Pollution Prevention Team, Tim Cruickshank (ISO 14001 Certified Lead Auditor, with experience conducting inspections of oil and chemical containers using the SP001 Standard for the Inspection of Aboveground Storage Tanks, by the Steel Tank Institute (STI). Through experience inspecting hazardous material containers, with knowledge in the principles and practices of industrial stormwater controls and pollution prevention, and with education and experience on risk management, Tim is a qualified inspector. Trained backup inspector is the ISO/IATF Assistant Emily Johnsen.

Note: Inspections must be performed by qualified personnel with at least one member of your stormwater pollution prevention team participating. Inspectors must consider the results of visual and analytical monitoring (if any) for the past year when planning and conducting inspections. Qualified personnel are those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can also evaluate the effectiveness of control measures.

2. **Schedules for conducting inspections.** Inspections are conducted according to the following schedule: Once per calendar quarter, minimum, with one immediately following a steady or heavy rain.

Note: Inspections must be conducted at least quarterly (i.e., once each calendar quarter), or in some instances more frequently (e.g., monthly), as appropriate. Increased frequency may be appropriate for some types of equipment, processes and stormwater control measures, or areas of the facility with significant activities and materials exposed to stormwater. At least one of your routine inspections must be conducted during a period when a stormwater discharge is occurring.

3. List areas where industrial materials or activities are exposed to stormwater. Areas include:

Exterior of building, along West side on site map.

Exterior of building, one area on North side.

Exterior of building, 2 areas along East side.

4. List areas identified in the SWPPP (section 1 of the SWPPP Template) and any others that are potential pollutant sources (see Part 5.2.3). Areas include:

Exterior of building, along West side on site map:

Activities: material storage – stormwater discharges associated with industrial activity
chemical storage just inside West side exit door (code B on ODM site map)

Pollutants: material storage pollutant = traces of mineral oil, ferric oxide rust, chromium oxide rust leach off in acid rain. Chemical storage pollutant = sodium metasilicate (CAS 6434-92-0) 2%, and Butyl Cellosolve (CAS 111-76-2) 7%.

Spills and Leaks: NONE have occurred in previous 3 years. Spill or leak potential of chemical is 330 gallons near doorway that exits out to West side of building, and COULD seep under/thru doorway onto Impervious surface of ODM property bordering East Ave (there are 3 storm sewers nearby on East Ave). A rain event during or after a leak or spill at this area could carry an increased quantity of the pollutants described in previous paragraph, to then discharge into an East Ave. storm sewer.

Unauthorized Non-stormwater Discharges: SWPPP Coordinator Tim C has evaluated the area for the presence of non-stormwater discharges and found NONE.

Exterior of building, one area on North side on site map:

Activities: material storage – stormwater discharges associated with industrial activity

Pollutants: traces of mineral oil, ferric oxide rust, chromium oxide rust leach off in acid rain

Spills and Leaks: NONE could occur, None have occurred in previous 3 years.

Unauthorized Non-stormwater Discharges: SWPPP Coordinator Tim C has evaluated the area for the presence of non-stormwater discharges and found NONE.

Exterior of building, 2 areas along East side on site map:

Activities: material handling - stormwater discharges associated with industrial activity.

Oily steel scrap generated indoors and disposed of into an outdoor steel bin via conveyor belt to steel chute, then falls into steel bin-Outdoor bin has open top. Inside same bin, oil drips off scrap & accumulates at bottom, but bins DO NOT leak. Bin is then removed off-site by contractor, who then recycles steel + oil. Oil can drip to paved surface below (from conveyor belt) & mix with storm water. Steel conveyor structure + drop chute is exposed to stormwater, rust and paint can leach off and mix with stormwater. Area affected is East side of ODM property, East of building.

Pollutants:

Mineral Oil, emulsifiable & Non-hazardous.

Excess steel trim scrap – with trace constituents of carbon, chromium, manganese, copper, molybdenum, phosphorus, sulfur, nitrogen, aluminum, titanium, silicon, niobium, vanadium, boron, nickel.

Ferric Oxide (rust from steel)

Chromium Oxide (from stainless steel)

Paints of unknown composition of binders and solvents, can leach off in acid rain

Spills and Leaks: None have occurred in the previous 3 years. What could occur is that oxides and paints can leach off equipment due to acid rain, small and tiny shavings from scrap could miss scrap bin and mix with stormwater.

Unauthorized Non-stormwater Discharges: SWPPP Coordinator Tim C has evaluated the area for the presence of non-stormwater discharges and found NONE. This particular evaluation will be performed annually by the SWPPP Coordinator.

5. **Areas where spills and leaks have occurred in the past 3 years.** NONE.
6. **Inspection information for discharge points.** THERE ARE 2 DISCHARGE POINTS ON THE SOUTH END OF THE BUILDING ONTO A GRASSY AREA NEXT TO THE BUILDING. THESE DISCHARGE POINTS ARE DRAINS FROM THE FLAT ROOFTOP. THIS IS UNPOLLUTED STORMWATER FROM INDUSTRIAL ACTIVITY, WITH MINIMAL SEDIMENT.
7. **List the control measures used to comply with the effluent limits contained in this permit.**

To minimize exposure industrial activity to stormwater, ODM has instituted the following measures:

- Utilize all indoor available space for handling and storage.
- Loading and unloading docks are covered by a roof and walls on 3 sides.
- Used solvents from cleaning and maintenance activities are taken off-site by a recycler.
- Maintains only 2 outdoor sites for stormwater run-off (other stormwater run-off is routed to sanitary sewers).
- The grading of dock surfaces slant inward rather than out towards the environment.
- Store all hazardous materials indoors and mostly away from exit doors in case of a spill.
- Maintain absorbent materials (spill pads) in-house to quickly soak up minor leaks and spills.
- Install secondary containment spill protection for hazardous liquids to prevent spills/spreading.
- Drain used fluids into temporary drums, later to be taken by recycler.

To promote good housekeeping and help minimize pollutant discharges, ODM requires that employees:

- Cleanup spills/notify spill response team member when discovered, to prevent possible spreading and tracking once stepped in.

- Clean floors/equipment of oils & hazardous materials and dispose of used solvent in recycle.
- Keep outdoor dumpster lids closed (garbage/recycle).
- Minimize floatable debris on grounds by providing sufficient covered garbage cans.

To maintain equipment at ODM as fit for use, avoid potential spills or contamination of stormwater, we:

- Regularly inspect equipment containing hazardous substances to discover leaks.
- Conduct & document preventive maintenance on equipment containing hazardous substances.
- Maintain spare parts in order to fix or prevent leaks and spills on equipment.
- Conduct predictive maintenance where possible to prevent overheating and leaks.

ODM promotes and prepares for spill prevention and response by:

- Maintaining a trained staff to respond to any spills.
- Taking proactive steps to prevent spills (storing oils/chemicals away from forklift traffic and other moving industrial equipment, using basic BMP such as only trained forklift drivers can move containers, only those trained and experienced with plumbing/piping are allowed to connect/disconnect pipes to and from 330 gallon IBCs).
- Maintaining secondary containment for areas of risk.
- Maintaining sufficient absorbent on-hand to contain and clean-up a worst-case spill.
- Training all employees on who to notify if and when they see a leak or spill.
- Having a contractor capable of major spill clean-up for situations beyond ODM capacity.

ODM takes control of run-off to ensure:

- Minimal discharge.
- The ability to re-route discharge if necessary.
- That discharge points are easily and effectively monitored.

ODM maintains salt storage in a manner to:

- Avoid outdoor storage piles or piles containing salt.
- Avoid indoor storage piles or piles containing salt.
- To maintain salt only for de-icing, and ONLY in bags.

ODM conducts training of key staff (Stormwater Pollution Prevention Team) to:

- Maintain a state of readiness and respond quickly, when needed.

- Ensure that those responsible to clean leaks and spills know how to use absorbents effectively.
- Ensure that other employees know their role in preventing spills & leaks and how to report them.
- Ensure that secondary containment is sufficient and properly used.
- To help prevent unnecessary spills and leaks

The SWPPP Coordinator will quarterly (at a minimum) evaluate ODM grounds for the presence of non-stormwater discharges:

- To ensure that any non-stormwater discharges present include ONLY those allowable by MSGP section 1.1.3. and its subsections.
- To detect non-stormwater discharges that are NOT allowable and trace back to their source.
- To eliminate, or block non-stormwater discharges that are not allowable, or until such time that an appropriate permit can be obtained.

The SWPPP Coordinator will additionally monitor ODM grounds for:

- The generation of dust on its grounds & take steps to minimize dust stirred up by vehicle traffic.
- Maintain clean lots to accommodate traffic without stirring up dust.
- To track vehicles with industrial materials that pollute ODM grounds.
- To conduct off-site tracking of vehicles carrying raw, final or waste materials in order to minimize pollutant discharges.

Numeric Effluent Limitations Based on Effluent Limitations Guidelines DOES NOT APPLY TO ODM.

8. Other site-specific inspection objectives.

To assess the general cleanliness of the ODM grounds and presence of litter.

4.6.2 Quarterly Visual Assessment of Stormwater Discharges.

Instructions (see 2015 MSGP Part 3.2):

Describe the procedures you will follow for conducting quarterly visual assessments in accordance with Part 3.2 of the 2015 MSGP. The visual assessment must be made:

- Of a discharge sample contained in a clean, colorless glass or plastic container, and examined in a well-lit area;
- On samples collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and you must document why it was not possible to take the sample within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge from your site; and
- For storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if you document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period.

Document the results of your visual assessments and maintain this documentation onsite with your SWPPP as required in Part 5.5 of the 2015 MSGP. Any corrective action required as a result of a quarterly visual assessment must be performed consistent with Part 4 of the 2015 MSGP.

In addition to other inspections or assessments, ODM will conduct quarterly visual assessments of stormwater discharges according to the following procedures and instructions in 4.6.2, for the term of the permit:

- Using a colorless or clear glass or plastic container holding 1 – 8 ounces, collect a stormwater sample from each applicable outfall (being careful not to contaminate it), within the first 30 minutes of an actual discharge from a storm event.
- If not possible during the first 30 minutes of discharge, collect the sample as soon as possible afterwards (document in the assessment why the sample was not obtained in the first 30 minutes).
- In the case of snow-melt, samples must be taken during a period of measurable discharge from ODM's site.
- Record the interval period that is a representative time frame between, or for, local storm events during each particular sample period.
- Conduct a visual assessment of each sample taken and observe for the following:
 - Color
 - Odor
 - Clarity (diminished)
 - Floating solids
 - Settled solids
 - Suspended solids
 - Foam
 - Oil Sheen

- Other obvious indicators of stormwater pollution

If the visual shows evidence of stormwater pollution, a corrective action must be initiated per MSGP part 4. ODM would use its standard 8D form (F10.2.3) to document the corrective action.

This quarterly visual assessment documentation must include the following:

- The Quarterly Visual Assessments are to be documented on ODM form # F3.2.1EMS
- The location(s) where samples are taken - significant discharge points indicated on the detailed Site Location Map.
- Sample collection date & time, and visual assessment date and time for each sample.
- Personnel collecting the sample and performing visual assessment, and their signature(s).
- Nature of the discharge (stormwater runoff or snowmelt).
- Results of observations of the stormwater discharge.
- Probable sources of any observed stormwater contamination.
- If applicable, why it was not possible to take samples within the first 30 minutes.
- A statement of compliance, signed and certified in accordance with MSGP Appendix B, Subsection 11.

See MSGP 3.2.3 for exceptions to requirements or timeliness.

Other documentation follows the requirements set forth in MSGP 5.5

For quarterly visual assessments to be performed at your site, your SWPPP must include a description of the following:

1. **Person(s) or positions of person(s) responsible for assessments.** Timothy Cruickshank
2. **Schedules for conducting assessments.** General schedule is as follows:
 - 1st Quarter assessment.
 - 2nd Quarter assessment.
 - 3rd Quarter assessment.
 - 4th Quarter assessment.
3. **Specific assessment activities.**

To visually monitor all locations of discharge on ODM site Map, all locations designated for monitoring on site map, locations marked as having stormwater exposed to industrial activity, areas with potential run-on, areas immediately surrounding storm sewers on ODM grounds.

Perform visual assessment of samples taken.

Document all relevant findings.

Additional documentation requirements are met according to the following procedure:

- Inspection, monitoring, certification records, a copy of the NOI and significant records from the EPA are maintained together by the SWPPP Coordinator to demonstrate full compliance with the conditions of this permit.
- Corrective actions, benchmark studies, maintenance and repairs applicable to SWPPP are also maintained.
- All other documentation requirements described in MSGP 5.5 are maintained by the SWPPP Coordinator.

4.6.3 Exception to Routine Facility Inspections and Quarterly Visual Assessments for Inactive and Unstaffed Sites.

Instructions (see 2015 MSGP Parts 3.1.1 and 3.2.3):

If you are invoking the exception for inactive and unstaffed sites relating to routine facility inspections and/or quarterly visual assessments, you must include documentation to support your claim that your facility has changed its status from active to inactive and unstaffed.

To invoke this exception you must also include a statement in your SWPPP per Part 5.2.5.2 indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii). The statement must be signed and certified in accordance with Appendix B, Subsection 11.

Note: If circumstances change and industrial materials or activities become exposed to stormwater or your facility becomes active and/or staffed, this exception no longer applies and you must immediately resume routine facility inspections. If you are not qualified for this exception at the time you become authorized under the 2015 MSGP, but during the permit term you become qualified because your facility becomes inactive and unstaffed, and there are no industrial materials or activities that are exposed to stormwater, you must include the same signed and certified statement as above and retain it with your records pursuant to Part 5.5.

Inactive and unstaffed facilities covered under Sectors G (Metal Mining), H (Coal Mines and Coal Mining-Related Facilities), and J (Non-Metallic Mineral Mining and Dressing) are not required to meet the "no industrial materials or activities exposed to stormwater" standard to be eligible for this exception from routine inspections, per Parts 8.G.8.4, 8.H.8.1, and 8.J.8.1.

This site is inactive and unstaffed, and has no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii) as signed and certified in Section 7 below.

If you are invoking the exception for inactive and unstaffed sites for your routine facility inspections and/or quarterly visual assessments, include information to support this claim.

DOES NOT APPLY.

4.7 Monitoring.

Instructions (see 2015 MSGP Part 5.2.5.3):

Describe your procedures for conducting the five types of analytical monitoring specified by the 2015 MSGP, where applicable to your facility, including:

- Benchmark monitoring (2015 MSGP Part 6.2.1 and relevant requirements in Part 8 and/or Part 9);
- Effluent limitations guidelines monitoring (2015 MSGP Part 6.2.2 and relevant requirements in Part 8);
- State- or tribal-specific monitoring (2015 MSGP Part 6.2.3 and relevant requirements in Part 9);
- Impaired waters monitoring (2015 MSGP Part 6.2.4);
- Other monitoring as required by EPA (2015 MSGP Part 6.2.5).

Depending on the type of facility you operate, and the monitoring requirements to which you are subject, you must collect and analyze stormwater samples and document monitoring activities consistent with the procedures described in 2015 MSGP Part 6 and Appendix B, Subsections 10 – 12, and any additional sector-specific or state/tribal-specific requirements in 2015 MSGP Parts 8 and 9, respectively. Refer to 2015 MSGP Part 7 for reporting and recordkeeping requirements. *Note: All monitoring must be conducted in accordance with the relevant sampling and analysis requirements at 40 CFR Part 136.* Include in your description procedures for ensuring compliance with these requirements.

If you are invoking the exception for inactive and unstaffed sites for benchmark monitoring, you must include in your SWPPP the information to support this claim as required by 2015 MSGP Part 6.2.1.3.

If you plan to use the substantially identical discharge point exception for your benchmark monitoring requirements, impaired waters monitoring requirements, and/or your quarterly visual assessment, you must include the following documentation:

- Location of each of the substantially identical discharge points;
- Description of the general industrial activities conducted in the drainage area of each discharge point;
- Description of the control measures implemented in the drainage area of each discharge point;
- Description of the exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants to stormwater discharges;
- An estimate of the runoff coefficient of the drainage areas (low = under 40%; medium = 40 to 65%; high = above 65%);
- Why the discharge points are expected to discharge substantially identical effluents.

Check the following monitoring activities applicable to your facility:

- Quarterly benchmark monitoring
- Effluent limitations guidelines monitoring
- State- or tribal-specific monitoring
- Impaired waters monitoring
- Other monitoring required by EPA

For each type of monitoring checked above, your SWPPP must include the following information:

Select type of monitoring activity from drop-down list below (if subject to more than one type of monitoring activity, you will need to copy and paste the items below for each monitoring activity):

Quarterly Benchmark Monitoring

1. **Sample location(s).** Discharge outlets from roof stormwater, all other areas where there is discharge to stormwater from industrial activity (East, West, North, South sides of building), see site map.
2. **Pollutants to be sampled.** Stormwater run-off from industrial activity- storage of equipment and processing, for aluminum, iron, zinc
3. **Monitoring Schedules.** Quarterly, same day as Quarterly visual assessments described in the previous section 4.6.2.
4. **Numeric Limitations.** NONE (Sector AA)
5. **Procedures.** The monitoring described here in section 4.7 will be taken on the same day as visual assessments. Procedure for collecting samples:
 - get the information needed to trace a sample raw material (Inventory Tag #);
 - obtain a copy of the material cert, or mill cert forwarded from the steel mill;
 - Check cert for the presence of pollutants cited in MSGP 8.AA.5, table 8.AA-1, and where they exist, confirm they are equal to or less than the "Benchmark Monitoring Concentration."
 - Send stormwater sample to qualifying lab for testing/analysis consistent with 40 CFR Part 136 (Environmental Monitoring and Tech, Morton Grove, IL., or other qualifying EPA test lab);
 - Compare results to MSGP section 8.AA.5, Table 8.AA-1, Subsector AA1.

Additional Sector-Specific Requirements for Industrial Activity, per MSGP, Part 8, Subpart AA-Sector AA.

Housekeeping measures:

Raw steel handling and storage-

- Raw material (steel) used in-process is setup to minimize scrap generated to help hold down costs & prevent waste. Prior to use, raw materials are stored indoors and away from possible precipitation/stormwater.

Paints and painting equipment-

- All paints and painting equipment is used and maintained indoors away from stormwater.

Spill Prevention and Response Procedures:

It is the responsibility of the SWPPP Coordinator to ensure that the necessary equipment to implement a cleanup is available to personnel. Cleanup materials include absorbent pads, rags, shop-vac vacuum, shovels, mops & waste container for oil-soaked materials. Other sector-Specific Requirements include:

- **Metal Fabricating Areas** are maintained clean, dry and orderly. Where practicable, dry cleanup techniques are used.
- **Storage areas for raw metal** that could cause, or impede appropriate and timely response to spills or leakage are maintained in a manner that is conducive to spill response, clean and uncluttered. Stored materials are labeled to aid in identification.
- **Metal working fluid** storage areas are located indoors and away from exit doors to minimize

- the potential for stormwater contamination. The supplier of our tool & die cleaning dunk tank with metal working solvent (Safety-Kleen) takes and replaces the used solvent.
- **Cleaners and rinse water** is controlled and cleaned up to prevent exposure to stormwater. Cleaners that are significantly harmful to the environment will be substituted for less harmful ones when feasible. The cleaner and rinse water used to wash ODM product is pumped into a thousand-gallon liquid waste storage tank, with the waste periodically taken by a recycler. To prevent a spill or leak from this storage tank from discharging around it and potentially out into the environment via exit door, or storm sewer, or berm has been installed on the floor around the tank that will hold the maximum capacity inside the tank.
 - To minimize the potential of **lubricating oils and hydraulic fluids** to contaminate stormwater, they are maintained indoors. Oils and fluids in locations where used, in containers of 55 gallons or more sit on secondary containment "Spill Pallets." For spills or leaks that may occur before getting to locations with secondary containment, ODM maintains a sufficient amount of spill pads to cleanup a worst-case scenario spill. Some waste oils are pumped into 55 gallon drums on secondary containment pallets, or into the 1000-gallon liquid waste storage tank – later recycled.
 - **Chemical Storage Areas** are located indoors (except for propane tanks), away from exit doors and storm sewers to prevent stormwater contamination.
 - As part of ODM's SPCC program, all oil & chemical containers of 55 gallons or more are **inspected monthly for spills, leaks or container damage** by the SWPPP Coordinator or a trained member of the Stormwater Pollution Prevention Team. When necessary, a member of the Stormwater Pollution Prevention Team is summoned by the SPCC Inspector to clean a spill, stop a leak or potentially to drain the contents of a damaged container deemed as high risk, into an undamaged container of sufficient capacity.
 - ODM ensures that **proper disposal methods** of hazardous waste are always observed. A local recycler of used oil and chemical waste, Beaver Oil Company, comes to take away most of our used hazardous chemicals with a small tanker truck.

Note: it may be helpful to create a table with columns corresponding to # 1 - 5 above for each type of monitoring you are required to conduct.

Inactive and unstaffed sites exception (if applicable)

This site is inactive and unstaffed, and has no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii) as signed and certified in Section 7 below.

Substantially identical discharge point (outfall) exception (if applicable)

If you plan to use the substantially identical discharge point exception for your benchmark monitoring and/or quarterly visual assessment requirements, include the following information here to substantiate your claim that these discharge points are substantially identical (2015 MSGP Part 5.2.5.3):

- Location of each of the substantially identical discharge points: **North by Northeast outer wall of facility has 3 downspouts.**

- List the general industrial activities conducted in the drainage area of each discharge point: **There are no industrial activities in the drainage area of these discharge points.**
- List the control measures implemented in the drainage area of each discharge point: **Quarterly Benchmark monitoring with analytical studies for this discharge point, per the guidelines of MSGP Section 8.AA.5, Table 8.AA-1, Subsector AA1.**
- List the exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants to stormwater discharges: **There are air conditioning units on the flat roof in the general vicinity where stormwater would collect and drain into the downspouts. No exposure to any other industrial materials.**
- An estimate of the runoff coefficient of the drainage areas (low=under 40%; medium=40 to 65%; high =above 65%): **50%**
- Why the discharge points are expected to discharge substantially identical effluents: **These effluents will come from a raised section of the flat roof, with water from this isolated area draining to the three downspouts. The three downspouts are draining stormwater from the same general collection point.**

SECTION 5: DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS.

5.1 Documentation Regarding Endangered Species.

Instructions (see 2015 MSGP Part 5.2.6.1):

Include any documentation you have that supports your determination of eligibility consistent with 2015 MSGP, Part 1.1.4.5 (Endangered and Threatened Species and Critical Habitat Protection). Refer to Appendix E of the 2015 MSGP for specific instructions for establishing eligibility.

Not Applicable

5.2 Documentation Regarding Historic Properties.

Instructions (see 2015 MSGP Part 5.2.6.2):

Include any documentation you have that supports your determination of eligibility consistent with 2015 MSGP Part 1.1.4.6 (Historic Properties Preservation). Refer to 2015 MSGP, Appendix F for specific instructions for establishing eligibility.

Not Applicable

SECTION 6: CORRECTIVE ACTIONS.

Instructions (see 2015 MSGP Part 4):

Describe the procedures for taking corrective action in compliance with Part 4 of the 2015 MSGP.

The following conditions require corrective action at ODM when:

- An unauthorized release or discharge (spill, leak or discharge of non-stormwater not authorized by this or another NPDES permit to U.S. waters) that occurs on ODM grounds.
- A discharge that violates a numeric effluent limit listed in Table 2-1 and in your Part * sector-specific requirements.
- ODM 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 that was never installed, was installed incorrectly, or not in accordance with Parts 2 and/or 8, or is not being properly operated or maintained.
- Whenever a visual assessment or quarterly inspection shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).
- Whenever else deemed necessary by the SWPPP Coordinator.

Situations requiring immediate corrective actions:

- To prevent or minimize a discharge of pollutants, the ODM SWPPP Coordinator and Stormwater Pollution Prevention Team must take "all reasonable steps" necessary until a permanent solution is installed and made operational, SAME DAY as discovery was made, or within minutes where possible.
- Where "all reasonable steps" means that ODM has "undertaken initial actions to access and address the condition causing the corrective action, including cleaning up any exposed materials that may be discharged in a storm event (wiping, sweeping, vacuuming) or making arrangements (scheduling) for a new BMP to be installed at a later date," per MSGP 4.3.1
- Also per MSGP 4.3.1, "all reasonable steps" for purposes of complying with part 4.2, Conditions Requiring SWPPP Review to Determine if (SWPPP) modifications are necessary, when ODM's SWPPP Coordinator concludes that a corrective action is, in fact, not necessary, could include documenting WHY a corrective action is unnecessary.
- When the event needing corrective action is a spill or a leak, contaminated surfaces must be cleaned (using dry clean-up techniques such as absorbent pads or rags) so that there is no hazardous material left to discharge again in subsequent storm events.
- Whenever a problem is identified at a time when it is too late to initiate corrective action, corrective action activities must begin no later than the following work day.

The procedure for subsequent actions (after immediate actions):

- Where additional corrective actions are necessary, ODM must complete the corrective actions before the next storm event if possible, and within 14 calendar days from the time of discovery of the corrective action condition.
- Where it is not feasible to complete within 14 calendar days, the SWPPP Coordinator must document WHY.

- When 14 calendar days is not enough time, ODM will identify its schedule for completing the work, as soon as practicable after the 14-day time frame but no longer than 45 days after the discovery.
- Where the EPA is requiring corrective action and completion of the corrective action will exceed the 45-day timeframe, you can take additional time provided that ODM notifies the EPA Regional Office of our intention to exceed 45 days, the rationale for an extension, and a completion date (update the corrective action of these facts).
- When corrective actions result in changes to any of the controls or procedures documented in the SWPPP, the SWPPP Coordinator must modify the SWPPP accordingly within 14 calendar days of completing corrective action work.

Corrective action documentation:

- ODM corrective actions are to be documented on the ODM Corrective Action Report, form # F10.2.3.
- The corrective action must be opened by the SWPPP Coordinator, within 24 hours of becoming aware of the qualifying condition.
- Fully describe the condition, date and time of the incident, identify the substance involved, amount, location and reason for the spill, and any leaks, spills or other releases that resulted in discharges of pollutants to U.S. waters, through stormwater or otherwise.
- Include the date the condition was identified
- Describe immediate actions taken, staff involved, date and time clean-up was completed & actions taken.
- Must include a statement, signed and certified in accordance with Appendix B, subsection 11, or B11, by a qualifying corporate representative.

SECTION 7: SWPPP CERTIFICATION.

Instructions (see 2015 MSGP Part 5.2.7):


The following certification statement must be signed and dated by a person who meets the requirements of Appendix B, Subsection 11.A, of the 2015 MSGP.

Note: this certification must be re-signed in the event of a SWPPP modification in response to a Part 4.1 trigger for corrective action.

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.

Name: Carl M. Michaelsen III

Title: President & CEO

Signature: 

Date: March 19, 2020

SECTION 8: SWPPP MODIFICATIONS.

Instructions (see 2015 MSGP Part 5.3):

Your SWPPP is a "living" document and is required to be modified and updated, as necessary, in response to corrective actions. See Part 4 of the 2015 MSGP.

- If you need to modify the SWPPP in response to a corrective action required by Part 4.1 or 4.2 of the 2015 MSGP, then the certification statement in section 7 of this SWPPP template must be re-signed in accordance with 2015 MSGP Appendix B, Subsection 11.A.
- For any other SWPPP modification, you should keep a log with a description of the modification, the name of the person making it, and the date and signature of that person. See 2015 MSGP Appendix B, Subsection 11.C.

SWPPP ATTACHMENTS

Attach the following documentation to the SWPPP:

Attachment A – General Location Map

Include a copy of your general location map in Attachment A.

Attachment B – Site Map

Include a copy of your site map(s) in Attachment B.

Attachment C –2015 MSGP

Note: it is helpful to keep a printed-out copy of the 2015 MSGP so that it is accessible to you for easy reference. However, you do not need to formally incorporate the entire 2015 MSGP into your SWPPP. As an alternative, you can include a reference to the permit and where it is kept at the site.