STORM WATER POLLUTION PREVENTION PLAN

for

Chaney Enterprises – Gainesville RMC Plant (VPDES 110351)

14505 Lee Highway, Gainesville, VA 20155

Prepared by: Victor Vilece, Environmental Project Manager Chaney Enterprises, LP 2410 Evergreen Rd., Suite 201 Gambrills, MD 21054

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1. Introduction

Business Office Location: 2410 Evergreen Rd., Suite 201

Gambrills, MD 21054

Primary Emergency Contact

Name: Jim Decostanzo
Title: Plant Manager
Office Number: (301) 848-2843

Email: jdecostanzo@chaneyenterprises.com

Secondary Contact

Name: Jeff Slagle

Title: General Manager Cell: (540) 710-0075

Email: jslagle@chaneyenterprises.com

State Agency:

Virginia Dept. of Environmental Quality

(804) 698-4000

Specific Contact: Rebecca Vice Title: Compliance Auditor

Office Number: 1-800-332-6542 Cell/Direct: (703) 583-3922

Federal Agency:

National Response Center

(800) 424-8802

Storm Water Pollution Prevention Plan (SWPPP) Purpose Statement:

This SWPPP has been prepared by Chaney Enterprises for the Gainesville RMC Plant in Gainesville, Prince William County, Virginia. The SWPPP has been prepared in accordance with the requirements of COMAR 26.17.02 as described in the "Virginia General Discharge Permit" No. VAG110351.

2. Facility Overview

Description:

The facility produces concrete and stores sand and gravel for use in the ready-mix concrete batching operations. There is a 4 tier settling basin located on site. There is one diesel storage tank on site as well as a water storage tank. There is also a batch office trailer, a driver's trailer, and storage container on site.

Location:

The batch plant is located at 14505 Lee Highway, Gainesville, Virginia, 20155.

SIC/NAICS Codes:

SIC – 3273 Ready-Mix Concrete Facilities
NAICS – 327320 Ready-Mix Concrete Manufacturing

Site Drainage:

The site is composed of the above described buildings, tanks, and storage area. There is one main drainage zone on site, all run off is directed to the four tier settling basin in the northwest corner of the site (See *Figure 3*). There is one Discharge Point at the facility. Water is directed into the settling basin where it is given time for sediments to settle out and pH is corrected by a Fortrans Model 5000 CO2 pH Treatment System. The settling basin discharges onto the adjacent property after the water has been treated.

Industrial Activities and Potential Pollution Sources:

Industrial activities at the site which potentially may impact water quality from the introduction of pollutants include:

- Concrete batch production and admixtures
- Leaking petroleum from delivery and storage
- Aggregate storage

Material Inventory - Present:

Serval types of aggregate are stored on-site (*Table 2*). The aggregate is used in concrete batch production and resale. The materials stored include:

Material	Quantity
Cement	100 Tons
Aggregate	550 Tons
Sand	550 Tons
Diesel	6,000 Gallons

^{*}All aggregate/sand piles described above are exposed to storm water. Most gravelsized aggregate does not present a realistic run off threat. Sand likewise is not a major concern since it can be retrieved and placed back into storage if eroded.

Material Inventory – Past:

The existing inventory accurately represents the inventory of materials stored at this location in the past.

Facility Security:

The facility is located within a recycle yard/industrial area. The facility has adequate lighting. Entry is by a driveway at the northern edge of the property secured by an automated gate. There is a chain link fence surrounding the facility and recycling yard. It is gated and locked during non-working hours.

Discharge Information:

There is one (1) discharge point that handles both storm water and process water (*Figure 3*).

Sampling Data:

This site is permitted and is therefore required to be sampled quarterly. The parameters sampled for are pH, Total Suspended Solids (TSS), and flow. These constituents are analyzed according to direction provided by VADEQ. Discharge monitoring reports will be submitted on a quarterly basis to:

Virginia Department of Environmental Quality Northern Regional Office 13901 Crown Court Woodbridge, VA 22193

3. Best Management Practices (BMP's)

Operational Controls:

This facility has been evaluated for all applicable Operational Source Controls BMP's as established by the Virginia Department Quality in the Virginia Erosion and Sediment Control Handbook, Second and Third Edition.

Housekeeping

Employees of Chaney Enterprises, LP are responsible for maintaining the facility in a clean and orderly manner. Areas which could contribute to storm water pollution will be kept so as to minimize its' potential to contribute contaminants.

Good housekeeping includes:

- -Neat and orderly storage of chemicals
- Chemical storage containers labeled
- Containment of sediment on site.
- Prompt cleanup and removal of spillage, and
- Storage of garbage and trash in a tight dumpster.

Preventive Maintenance

This site is inspected on a routine, periodic basis. Maintenance issues which are identified are addressed in a timely manner.

Facility equipment and storm water drainage structures are inspected quarterly and serviced as needed.

Spill Prevention and Cleanup

Potential exists for petroleum spills during vehicle transfer and removal. Spills at this time could contribute to contamination of receiving waters, Virginia regulations require proper design, and maintenance of all tanks and storage areas. Monitoring and record keeping is required, as is on-site spill response capability.

Sediment and Erosion Control

The facility is partially paved and during storm events there is the possibility for sediment transport to the settling basins on-site. Materials that could potentially be eroded are checked daily. If issues are found they are addressed immediately.

Employee Training

Employees of Chaney Enterprises, LP will undergo yearly training. This training includes:

- Environmental awareness
- Site Knowledge
- State regulations and permit requirements
- Plant contents
- Pollution prevention overview
- Spill response procedures
- Housekeeping procedures
- Treatment system functions
- Importance of compliance

Pollution Prevention Committee

Victor Vilece is the Environmental Project Manager and is responsible for overseeing, implementing, and maintaining this plan. In addition he is responsible for assisting plant personnel in the full and continual adherence to the plan. This includes making management aware of resource needs. He also oversees all sampling of discharges on a quarterly basis and prepares and submits all DMR's. He heads the implementation of the Storm Water Pollution Prevention Plan.

Jeff Slagle, is also part of the Committee. His responsibility is to make the Plant Manager aware of new potential sources of storm water contamination as well as overseeing adherence to policy.

Jim Decostanzo is the plant manager and is responsible for monitoring treatment systems and implementing BMP's on a daily basis.

All employees at this location are encouraged to bring to the attention of the committee members any deficiency they encounter, or any ideas for storm water protection they may have.

Source Controls:

This facility has been evaluated for all applicable Source Control BMP's as established by the Virginia Department of Environmental Quality in the Virginia Erosion and Sediment Control Handbook, Second and Third Edition.

Treatment BMP's

One pH control system is located on-site at the Gainesville Facility (*Figure 3*). It is located at the settling basin. It functions as an automated pH neutralizing system for washout/wastewater and storm water runoff. It utilizes non-hazardous carbon dioxide gas with proper storage on-site. This system is checked on a daily basis (during plant operations hours) and on-site personnel ensure that it is functioning properly. Any issues with the system will be reported to the pollution prevention committee members for immediate correction.

Run-Off BMP's

Storm water run-off from the property discharges onto the adjacent property which discharges into the North Fork Broad Run. There is no evidence of any erosional or depositional problems associated with this drainage – therefore addition flow controls have not been necessary.

Enhanced and / or Additional BMP's

In case enhanced or additional BMP's are deemed necessary, a schedule for implementation will be developed and incorporated into this plan within 30 days of determination. The new BMP's will be implemented with all due diligence. Unless otherwise directed by VADEQ, all newly required operational BMP's will be implemented within 15 days of direction. BMP's that require capital expenditures will be implemented within six months.

4. Monitoring Plan

Discharge Points and Flow Characteristics:

There is surface water discharge from the ready mix concrete operation into a tributary of Lake Manassas. The sampling and analytical methods, if used, shall conform to procedures for the analysis of pollutants as identified in 40 CFR Part 136 – "Guidelines Establishing Test procedures for the Analysis of Pollutants" unless otherwise directed by VADEQ.

Sampling Data Summary:

Sampling is done quarterly as described in the "Virginia General Discharge Permit" No. VAG110351.

Visual Monitoring:

pH and visual air quality inspections are performed daily (Appendix C and D). The surface water discharge point is visually inspected quarterly. This is done in conjunction with review of any maintenance issues regarding the diversion structures. A comprehensive inspection is done every year by onsite personnel or a member of the Pollution Prevention Committee.

Unintended Discharges:

There have been no reported incidents of unintended discharges at this location.

5. Inspections

Comprehensive Site Compliance Evaluation:

Inspections are performed quarterly and documented with a CEEIP inspection form (Appendix A). The inspection reports are retained for three (3) years onsite as well as in the corporate office. Signature on the form signifies certification that the site is in compliance with the SWPPP and the "Virginia General Discharge Permit" No. VAG110351.

6. Compliance with SARA Title II

Chemicals subject to SARA Title III. Section 3 includes diesel fuel. Diesel fuel is subject to the SPCC Plan requirements of the Clean Water Act. The SPCC Plan addresses compatibility, secondary containment, spill prevention, spill control, and drainage. The facility currently does not have a P.E. certified SPCC Plan. There have been no discharges of any material covered under SARA Title III at this facility in the past three (3) years.

7. Consistency With Other Statutes and Plans

Chaney Enterprises, LP is subject to certain requirements and schedules that pertain specifically to its reclamation areas. They do not impact the requirements under the Virginia Discharge Permit" No. VAG110351. Vehicle maintenance is are currently done off-site, if this were to change the facility would obtain proper VADEQ permitting.

8. Administration of SWPPP

Access to SWPPP:

This plan will be retained on-site in the batch plant office and at the corporate office located at 2410 Evergreen Road, Gambrills, MD 21054. Upon request it shall be made available to VADEQ. Any requests for a current copy or updates will be honored within two weeks of formal receipt of the request.

Amendments to the SWPPP:

The Plan shall be amended whenever there is a change in design, construction, operation, or maintenance of any BMP's that causes the Plan to be less effective in preventing storm water pollution. It will also be amended upon direction by VADEQ or when visual monitoring indicated a need for an amendment.

Storm Water Pollution Prevention Plan Changes:

Date	Individual Responsible for Change	Nature of Change
12/18/18	Victor Vilece	Changed members of Pollution Prevention Committee; Section 3
2/27/19	Victor Vilece	Updated to reflect changes at the site.

Inspection and Record Keeping:

Inspections as required by the Virginia Department of Environmental Quality as described in the "Virginia General Discharge Permit" No. VAG110351 will be conducted by members of the Pollution Prevention Committee or the Plant's Manager or his authorized representative. Walkthrough inspections are conducted quarterly, and a comprehensive site inspection is done annually. Reports of visual monitoring done by facility staff will be submitted to the Environmental Project Manager. Deficiencies identified will be scheduled for correction. When necessary, a schedule of compliance

will be developed and submitted into this Plan. Records of all monitoring information, inspection reports, and any other compliance documentation will be kept for three (3) years onsite as well as in the corporate office. All information described above is available for review by contacting the Environmental Project Manager.

Signatures:

All reports required by the Virginia Department of Environmental Quality as described in the "Virginia General Discharge Permit" No. VAG110351, the applicable regulations and this Plan, and other documentation requested by the Virginia Department of Environmental Quality shall be signed by the Plant's/Environmental Manager or an employee or agent under his direct supervision. The Plant's/Environmental Manager has been given overall responsibility for these matters by a principal executive officer. All persons signing documents a described above must make the following certification:

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

Sign:	Date:	3/1/19

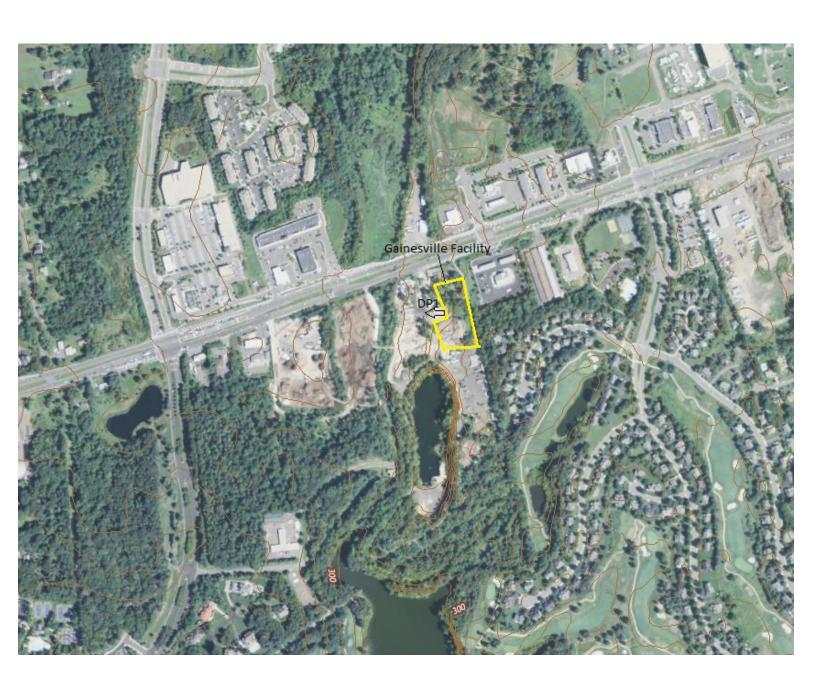
Title: Environmental Project Manager

FIGURE 1: MAP OF FACILITY



FIGURE 2:

TOPOGRAPHIC MAP



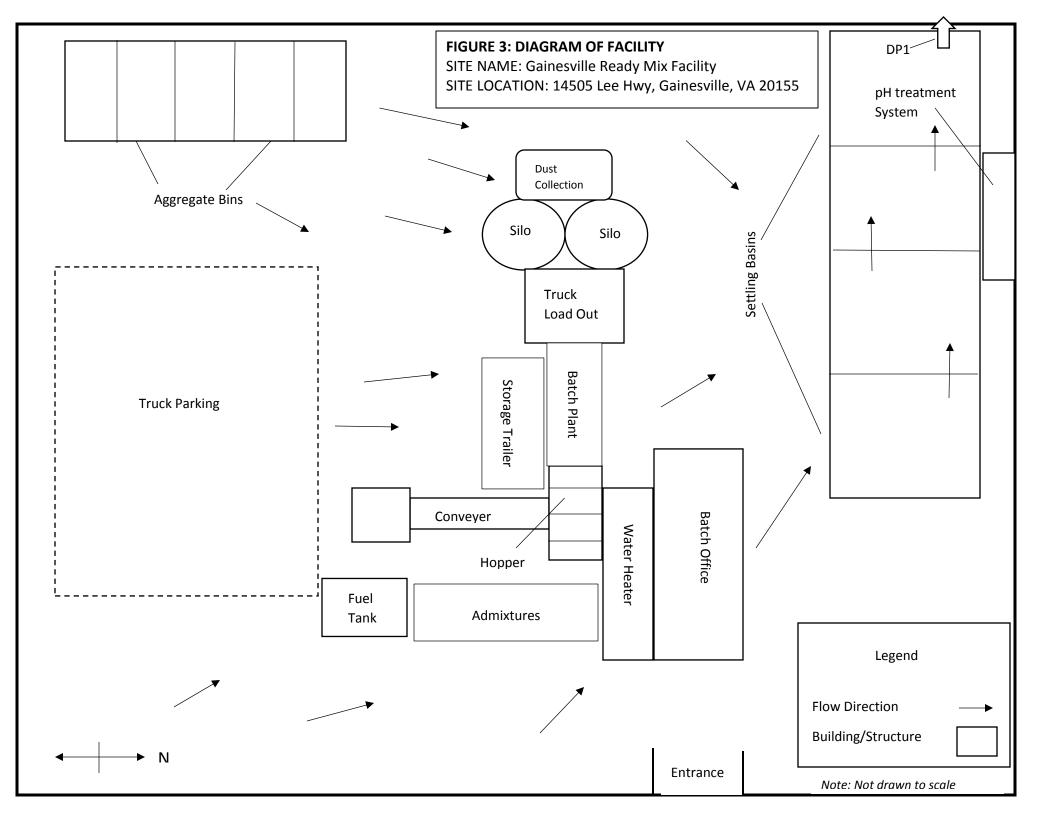


TABLE 1 EXISITING STORM WATER DRAINAGE AND DISCHARGE POINTS

DRAINAGE ZONE/	STORM WATER DRAINAGE	POTENTIAL	POTENTIAL PROBLEMS
DISCHARGE POINTS	DESCRIPTION	POLLUTION	
	Natural Topography and site grading	Gasoline, Diesel	Diesel fuel/fluids may leak from
Facility Drainage	direct drainage throughout the site.	Fuel, Hydraulic	trucks and equipment. Improper
Facility Drainage	A four (4) tier sediment basin will	Oil/Fluids,	loading may result in sediment
	collect and treat all run off from site.	Sediment	discharge.
	Graded to direct water to the	Gasoline, Diesel	Diesel fuel/fluids may leak from
	sediment basins and DP-1. Run off	Fuel, Hydraulic	trucks and equipment. Improper
DZ-1	will come from the batch plant,	Oil/Fluids,	loading may result in sediment
	parking area, and aggregate bins.	Sediment	discharge. Aggregates may be
			carried by storm water.
	Located in the northwest corner of	Sediment	Runoff from bulk material areas
	the site. The sediment basin collects		may result in excess sediment
DP-1	run off from the batch plant, parking		buildup.
	area, and aggregate storage bins		
	allows it to settle before		
	discharging.		

Table 2 MATERIAL INVENTORY

TRADE NAME MATERIAL	PHYSICAL DESCRIPTION	STORM WATER POLLUTANTS
Sand, Gravel	Solid particles	Silicon, suspended solids, turbidity, sediment
Hydraulic oil/fluids	Brown oily petroleum hydrocarbon	Mineral oil
Gasoline	Colorless, plae brown pr pink petroleum hydrocarbon	Benzene, ethyl benzene, toluene, xylene, MTBE
Diesel Fuel	Clear, blue-green to yellow liquid	Petroleum distillate, oil & grease, naphthalene, xylenes
Antifreeze/coolant	Clear green/yellow liquid	Ethylene glycol, propylene glycol, heavy metals (copper, lead, zinc)

TABLE 3 SWPPP IMPLEMENTATION SCHEDULE

SWPPP FEATURE	TARGET IMPLEMENTATION DATE
Environmental compliance inspections (CEEIP) Appendix A	Quarterly
Implementation of SWM Control Measures	Daily
Inspection of Water Treatment System Appendix C	Daily
Visual Inspection of Batch Plant Air Filtration System Appendix D	Daily
Employee Environmental Education Appendix E	Annually: 4 th quarter
Environmental Education Program Evaluation Appendix F	Annually: 4 th quarter
SWPPP Compliance Assessment Appendix G	Annually: 4 th quarter

TABLE 4 BMP INSPECTION SCHEDULE

SWPPP FEATURE	TARGET IMPLEMENTATION DATE
Drum Wash Basins	Inspect daily for sediment accumulation, Clean weekly or as needed.
Treatment Basins	Visually inspect daily for sediment accumulation and record freeboard measurement. Pump out sediments bi-annually or as needed.
pH Treatment System	Inspect pump daily for sediment accumulation/blockage. Clean as needed.
Fuel Station	Visually inspect quarterly for signs of wear and leaks.
Waste Concrete Storage	Visually inspect quarterly for proper containment. Clean residual waste as needed.
Material Storage Areas, Including Aggregate Stock Piles	Visually inspect quarterly for proper containment, labeling, and signs of leaks or spills.
Entrance, Yard, Berms, Curbs	Visually inspect quarterly for sediment accumulation, dust, and effectiveness in directing storm water.

For BMP Inspection logs see Appendix C, Appendix D, and Appendix E.



Appendix A

I. General Information CEEIP Inspection Form										
Facility:							Permit #:			
Date:		Time: \		Weather	r:		Phone:			
Facility							Site			
Address:								Manager:		
Inspector:										
II. Site Conditio	tions SWPPP On Site: Yes No DMR's On Site: Yes DM									
			Conditio					Comme	ents/Correct	tions Needed
		Great	Good	Fair	Poor				,	
E & S Contro				-						
On-Site Stora	ge									
Equipment, Vehicles	/									
Roadways										
Air Pollutio	n									
Discharge		Discharg	ging: Y	/ N						
Monitoring	5	рН:								
Additional Co	Additional Comments on Site Conditions:									
III. pH Treatme	nt Sy	stem								
					Questi				Answer	Site Corrections:
Washout/Set	tling	Have w	ashout b	asins/por	nds been	cleaned re	ecent	tly?		
Ponds						a w/handhe	eld p	robe?		
		What is	What is the pH reading upon arrival?							
pH Controll	er	What is the Hi limit reading?								
		What is the Lo limit reading?								
		How m	uch CO2/	Sodium b	isulfate	is in the ta	nk?			
Mixing		Does additional chemical need to be added/ tank filled?								
		Were site personal informed?								
		Is prob	e covered	l in residu	ie and d	irty?				Due Date:
pH Probe		Was probe classed with classing solution?						Days 1wk 2wk 3wk		
		What are readings before/after calibration with solution 7.0?								
		What a	re readin	gs before	/after ca	alibration w	vith s	solution 10.0?		
Piping Is intake piping functional?					Simu.					
	Is discharge piping functional?						Sign:			
Comments on pH System Conditions:										
Inspector								<u> </u>		
Name:		Signature: Date:					Date:			
				Ji	D'I I I I I					

APPENDIX B EMERGENCY CONTACT INFORMATION

IN THE EVENT OF A SPILL CONDUCT THE FOLLOWING STEPS:

- 1. LOCATE SPILL KIT
- 2. CONTAIN SPILL
- 3. CONTACT CHANEY SAFTEY DIRECTOR

Chris McCoy (240) 299-7172

4. CONTACT THESE AGENCIES

NATIONAL SPILL RESPONSE CENTER (800) 424-8802

APPENDIX C pH LOG

Date	Time	Weather	pH Reading	Freeboard	Signature

APPENDIX D AIR EMISSIONS LOG

Date	Observer	Time	Differential	Visible Emissions	If Visible Emissions:
			Pressure Reading	Yes/No	Date/Time of Corrective Actions

APPENDIX E ENVIRONTMENTAL EDUCATION SEMINAR SIGN-IN SHEET

Date	Employee Name	Employee Signature

APPENDIX F ENVIRONTMENTAL EDUCATION SEMINAR EVALUATION FORM

Program Feature	Applicable? (Y/N)	Comments
Has a date been established for the annual seminar?		
Will all state and federal regulations be addressed?		
Will employees be informed of any changes to the SWPPP?		
Will there be any outside sources involved in the training program?		
Did the facility staff appear more informed after last year's program?		
Have there been any employee comments/suggestions?		
Name:		Date:
Signature:		
Title:	_	

APPENDIX G SWPPP COMPLIANCE ASSESSMENT

SWPPP Feature	Y/N	Comments
Have quarterly CEEIPs been conducted and have forms been filed?		
Have BMP's been implemented and has the implementation schedule been adhered to?		
Has employee training been implemented?		
Has the Environmental Education Program been evaluated and forms filed?		
Have all changes to site function been addressed in the SWPPP?		
Name:		Date:
Signature:		
Title:		