Seaford Concrete Products 20956 Coverdale Rd, Seaford, DE 19933

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

In compliance with:

General Permit No.

National Pollution Discharge Elimination System (NPDES)

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I. Introduction

a. SWPPP Purpose

This Storm Water Pollution Prevention Plan (SWPPP) has been developed as requirement of the National Pollution Discharge Elimination System (NPDES) program for regulating storm water discharge form industrial facilities. Development, proper implementation and dedicated monitoring of the SWPPP will allow Seaford Concrete Products [herein known as the Seaford Facility for the purposes of this report] to control pollutants and comply with all established regulations. The primary purpose of this SWPPP is to:

- 1) Identify potential sources of pollution that may reasonably be expected to affect the quality of storm water discharges from the site,
- 2) Describe the practices that will be used to reduce pollutants in storm water discharges to assure compliance with the conditions of the Permit, and
- 3) Establish an implementation schedule to ensure that the proposed plan is properly implemented while monitoring the plan's effectiveness in meeting the design goals.

b. SWPP Content

The following components are included in this SWPPP:

- Description of the facilities and existing conditions
- Description of potential storm water contaminations
- Description of measure to be taken and Best Management Practices (BMP's) to be implemented
- Description of the monitoring and inspection plan to be implemented
- Identification of a SWPPP coordinator, SWPPP team members and the responsibilities involved, and
- Description of the requirements for permit compliance.

II. Facility Description

a. Facility Location

The Seaford Facility is located at 20956 Coverdale Rd, Seaford, Delaware and is within the Sussex County boundaries. **Figure 1** is a general vicinity map of the area.

b. Site Description

The Seaford Facility is located on the West side of Coverdale Road North of Mill Park Drive. The site is bordered by agricultural fields to the North, West, and East. Residential properties are to the South. Structures on-site include a foundation based office, concrete batch plant, scale/weigh station, truck fueling station/tanks, large warehouse style garage, and an aggregate wash plant. **Figure 2** is a facility sketch of existing conditions, illustrating pertinent on-site structures and includes approximate drainage zone locations, patterns of storm water drainage and locations of any discharge points.

c. Site Activities

Seaford RMC is classified as a codes 3273 and 1442 under the 1987 Standard Industrial Classification (SIC) guild lines and as codes 327320 and 212321 under the 2012 North American Industry Classification System (NAICS). Normal operating hours are 6:30 a.m. to 5:00 p.m. and there is an average of twelve full-time employees on schedule.

d. Existing Drainage and Discharge Conditions

The site can be divided into three main drainage zones. **Figure 2** includes approximate zone locations and patterns of storm water drainage.

Drainage Zone 1 (DZ-1), consists of the southern portion of the site and contains a portion of the mining area. Storm water in DZ-1 permeates into the ground.

Drainage Zone 2 (DZ-2), located down the center of the site and contains the office, concrete batch plant, scale/weigh station, fueling station/tanks, garage, and a as well as the wash plant pond and dredge. Storm water in DZ-2 permeates into the ground.

Drainage Zone 3 (DZ-3), consists of the northern portion of the site and contains a portion of the mining area. Storm water in DZ-3 permeates into the ground.

Additional detailed information about each drainage zone can be found in Table 1.

III. Potential Storm Water Contaminants

Currently there is no reasonable potential for significant soil erosion to occur on-site.

a. Material Inventory

Table 2 identifies materials that are used, stored or produced on-site that may contribute to storm water pollution. A physical description and the probable storm water pollutants are included. This SWPPP is focused on limiting the pollution from these sources.

b. Spill and Leak History

There are no records of any spills or leaks of any material in this facility within the past three years.

c. Potential Areas for Storm Water Contamination

The following core areas with potential for storm water contamination were considered in the development of this SWPPP:

 Aggregate Wash Plant: This area includes wash plant equipment such as a hopper, conveyor, and heavy equipment. Contamination may occur through leaking trucks and equipment or spills from overloaded trucks.

- <u>Concrete Batch Plant</u>: This area includes the batching equipment such as a conveyor and hopper. Contamination may occur through leaking trucks and equipment or spills from overloaded trucks.
- <u>Truck Wash Area</u>: Situated just beyond the Batch Plant, this area is where mixers wash exteriors and drums before and after deliveries. Contamination may occur through washing of engines or under carriages.
- <u>Fueling Station:</u> Contamination may occur in this area through improper fueling or leaking trucks and equipment.
- Garage: There is a large garage located just south of the site entrance. The garage is
 used for storing general site materials and repairing/storing equipment. Contamination
 may occur through leaking materials and vehicles or improper storage techniques.
- Office Building: This building serves as the main site office. This area includes a parking lot for site personnel's personal vehicles. Contamination may occur through fluid leaks from poorly maintained vehicles.
- <u>Stockpile Materials:</u> Several mounds of stockpile material (sand, stone, etc.) are located throughout the site. Contamination may occur in these areas through sediment runoff.
- <u>Sediment Erosion:</u> There is potential for sediment erosion on the slopes and inlet of the infiltration basin. Contamination may occur during storm events that could erode the slopes of the basin.

Table 1 includes site-specific information regarding storm water pollution potential from these areas.

d. Emergency Contact Information

Any chemical or oil spill will be recorded in the Spill and Leak Log (**Appendix D**). In the event of an emergency spill, the DNERC 24 Hour Release Hotline (800-662-8802) and the National Response Center at (1-800-424-8802) will be contacted. In the event of a spill situation, a standard spill response procedure will be followed (**Appendix B**). This procedure and emergency contact information will be visible and readily available in the site office.

IV. Storm Water Management (SWM) Control Measures

This section will detail existing SWM control measures and proposed controls that will be implemented to comply with permit requirements. All Best Management Practices (BMPs) used as control measures in this project were selected to meet or exceed EPA and local requirements. **Table 3** contains specific information and a schedule for target implementation of these control measures. **Figure 2** is a facility sketch of proposed control measures depicting approximate locations of implementation.

a. Site Evaluation of Existing Control Measures

The following is a list of effective control measures that are currently in place at the Seaford Facility:

- Wash Plant Pond: A large man-made pond is the primary collection area on-site. Site grading, swales, and perimeter berms direct water into this pond.
- <u>Perimeter berms:</u> The entire site is surrounded by vegetated berms. These berms keep all water confined to the site.
- <u>Fueling Station:</u> The fueling station is regularly inspected for potential leak hazards. Site personnel have been instructed on proper spill clean-up practices and contact information is posted on-site in the event of a spill.

- <u>Material Storage</u>: Any fluid canisters (truck oil, grease, add-mixtures) is housed in the
 on-site garages and is kept out of contact with storm water and will remain covered
 when not in use. There will be no open containers or bags or materials kept on site. Any
 partially used, bagged material will be transferred to a sealable container and properly
 labeled. Items such as brooms, dust pans, plastic gloves, kitty litter, sawdust, and extra
 sealable containers are available on-site.
- <u>Equipment Inspections:</u> Equipment used on-site are routinely inspected for fluid leaks
 and any other potential pollutants to storm water. All equipment will receive regular
 preventative maintenance to reduce the chance of fluid leakage. Any potential problems
 will be addressed as necessary.

b. Implementation of Proposed SWM Control Measures

The following is a list of appropriate control measures that will be implement at the Seaford Facility:

- <u>Stockpiles:</u> All stockpiles will be consolidated, and employees will ensure that there is no sediment, sand, or aggregate leaving the appropriate holding areas. These areas will be inspected twice a day and re-consolidated when needed.
- <u>Equipment Inspections:</u> Vehicles and equipment will be inspected for fluid leaks and any other potential pollutants to storm water. All vehicles and equipment will receive regular preventative maintenance to reduce the chance of fluid leakage.
- <u>General Housekeeping:</u> General good housekeeping measures will be implemented into a routine schedule to promote site compliance.
- <u>Air Pollution:</u> Dust suppression methods and regular sweeping will aid in minimizing air pollution that could originate from the site.

V. Facility Monitoring Plan

a. Routine Inspections

The wash plant pond, stockpile areas, fueling station, storage areas, site perimeter berms, and all other pollution prevention implementations will be inspected for effectiveness. As directed by the SWPPP Coordinator, an Environmental Evaluation team has been assigned to conduct a complete environmental site inspection no less than one time each quarter. Inspection forms will be completed and kept in the on-site file. A sample inspection form can be found in **Appendix A.**

b. Analytical Monitoring

Analytical monitoring is required under the permit should there be a discharge from the site (see **Appendix I** for monitoring form).

c. SWPPP Updates and Amendments

Any changes to operating conditions of the Lincoln Facility that require modification of existing BMPs or implementation of new BMPs will be recorded in **Appendix H**. This SWPPP shall be amended to include any change in design, construction, operation, or maintenance of the facility that has a significant effect on the potential for the discharge of pollutants to surface waters and that has not been addressed in the normal implementation of the SWPPP. This SWPPP shall also be updated whenever it is found to be ineffective in meeting the requirements of the NPDES Permit and any other applicable regulatory guidelines. In the event that the Delaware Department of Natural Resources and Environmental Control notifies the SWPPP Coordinator

that the SWPPP does not meet one or more of the provisions of the NPDES Permit or any other applicable regulatory guidelines, changes will be made within a timeframe approved by the DNREC.

VI. SWPPP Implementation Task Force

a. SWPPP Coordinator

The SWPPP Coordinator for the Lincoln Facility is the Environmental Project Manager for Chaney Enterprises and can be reached at 301-861-6094.

b. SWPPP Coordinator Responsibilities

The SWPPP Coordinator will be responsible for the following:

- Manage the SWPPP team in the implementation of the SWPPP plan
- Assign inspection duties
- Oversee employee training
- Ensure regulatory compliance of site activities
- Measure overall effectiveness of SWPP implementation
- Address any site operation changes with appropriate SWPPP modifications

c. SWPPP Implementation Task Force Team Members

The following team members will assist the SWPPP Coordinator in all aspects of the SWPPP implementation:

•	Steve Hackett	Plant Manager	301-399-4967
•	Tom Pittman	Maintenance Operations Officer	301-399-2224
•	Chris McCoy	EHS Manager	240-299-7172

VII. Compliance Requirements

a. On-site Record Retention

A copy of the most recently updated version of this SWPPP will be retained electronically in an online database and accessible by computer in the batch office. Copies of completed inspection forms will also be kept in the database for reference purposes. Additionally, all employee training records and certifications shall be made readily available upon request.

b. Employee Training

An annual environmental education seminar will be incorporated into ongoing employee training protocol to educate employees about the pollution prevention issues relating to this SWPPP. Employees will be introduced to the requirements of the SWPPP and will be instructed on how to monitor the implemented BMPs for maximum effectiveness, trained on proper spill response procedure, and job site chute rise out procedure. Training will be done through the Chaney University online portal, and employee completion of the program will be recorded in the portal. Prior to the seminar, the SWPPP Coordinator (or designated SWPPP team member) will evaluate the environmental education program to verify its effectiveness, implement any appropriate changes and complete an evaluation form. A sample evaluation form can be found in **Appendix F**.

c. Implementation Schedule

A proposed schedule for the implementation of this SWPPP can be found in **Table 3**. An implementation schedule for E&S Controls and BMPs is shown in **Table 4**. These schedules will be modified if there is any change to the sequence or expected completion dates and updated schedules will be inserted into the SWPPP file.

d. Annual SWPPP Compliance Assessment

A designated SWPPP team member will conduct an annual compliance assessment to ensure that the facility is complying with all requirements detailed in this SWPPP. All BMPs and E&S controls said to be in place will be inspected, adherence to the implementation schedule will be verified and a confirmation of an active employee training program will be made. An assessment report will be completed, and a copy of the assessment will be kept on record. A sample assessment form can be found in **Appendix G**.

e. Corporate 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."

<u>Victor Vilece</u> Name	Date
Environmental Project Manager Title	

FIGURE 1

General Vicinity Map



FIGURE 2

Faiclity Sketch

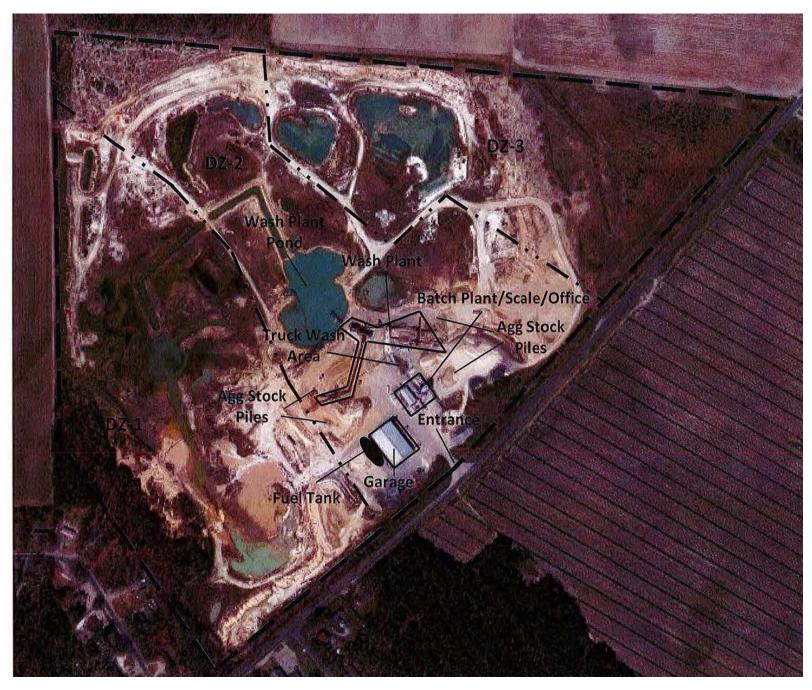


Table 1

<u>EXISITING STORM WATER DRAINAGE AND DISCHARGE POINTS</u>

DRAINAGE ZONE/	STORM WATER DRAINAGE	POTENTIAL	POTENTIAL PROBLEMS
DISCHARGE POINTS	DESCRIPTION	POLLUTION	
	Contains the mining area with little	Gasoline, Diesel	Diesel fuel/hydraulic fluids may
	to no grading or elevation change,	Fuel, Hydraulic	leak from trucks and equipment.
D7-1	water in this zone permeates into	Oil/Fluids,	
DZ-1	the soil or evaporates. Site	Sediment	
	perimeter berms define the zone's		
	southern and western border.		
	Located in the center of the site, this	Gasoline, Diesel	Diesel fuel/hydraulic fluids may
	one contains the wash plant and	Fuel, Hydraulic	leak from trucks and equipment.
	wash plant pond, batch plant, office,	Oil/Fluids,	Improper loading may and run off
DZ-2	truck scale, truck wash area,	Sediment	from bulk materials areas may
DZ-Z	aggregate stockpiles, garage, and		result in excess sediment build
	mining area. Grading in this zone		up.
	directs water to the wash plant		
	pond.		
	Contains a mining area with little to	Gasoline, Diesel	Diesel fuel/hydraulic fluids may
	no grading or elevation change,	Fuel, Hydraulic	leak from trucks and equipment.
	water in this zone permeates into	Oil/Fluids,	
DZ-3	the soil or evaporates. Site	Sediment, High pH	
DZ-3	perimeter berms define the zone's		
	northern and eastern borders. A		
	haul road forms the southern		
	border.		

Table 2

MATERIAL INVENTORY

TRADE NAME MATERIAL	PHYSICAL DESCRIPTION	STORM WATER POLLUTANTS			
Cleaning Solvents	Colorless, blue, or yellow-green liquid	Perchloroethylene, methylene, chloride, trichloroethylene, petroleum distillates			
Process Water	Clear or gray	Oil, grease, concrete			
Concrete	White or gray solids	Limestone, sand			
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			
Kerosene	Pale yellow liquid petroleum hydrocarbon	Coal oil, petroleum distillates			
Antifreeze/coolant	Clear green/yellow liquid	Ethylene glycol, propylene glycol, heavy metals (copper, lead, zinc)			
Polarset	Light green, clear liquid	Calcium Bromide, Calcium Nitrate, Diethyle Gycol, Methyldiethanolamine, Calcium Nitrite			
Daracel		Naphthalenesulfonic acid, polymer with formaldehyde			
All Safety Data Sheets can be viewed on the Chaney website:					

https://www.chaneyenterprises.com/resources/safety-data-sheets

Storm Water Pollution Prevention Plan Seaford Concrete Products

TABLE 3

SWPPP IMPLEMENTATION SCHEDULE

SWPPP FEATURE	TARGET IMPLEMENTATION DATE
Facility inspections	Quarterly
Implementation of SWM Control Measure	See TABLE 4
Employee Training Program	Annually: December
Environmental Education Program Evaluation	Annually: December
Annual Compliance Assessment	Annually December

TABLE 4

SWM CONTROL MEASURES IMPLEMENTATION SCHEDULE

FACILITY SITUATION	SWM CONTROL MEASURE	TARGET IMPLEMENTATION DATE
Fueling Station	Check for complete spill kit at fueling station.	Quarterly
	Inspect fuel tanks and containment areas for cracks and leaks.	Quarterly
Wash Plant	Inspect for leaks and sediment build up	Weekly
Batch Plant	Inspect for leaks, functioning dust collectors, sediment build up.	Daily
Equipment Inspections	On-site vehicles and equipment will be thoroughly inspected for fluid leaks and other potential pollutants.	Daily
	Preventative maintenance will be performed on a regular schedule.	Monthly/As Needed
General Housekeeping	Enforcement of good housekeeping measures will be implemented.	Daily



Appendix A I. General Information

I. General Informa	tion						CEEIP Inspection Form
Facility:						Permit #:	
Date:		Time:			Weather:		Phone:
Facility						Site	
Address:						Manager:	
Inspector:							
II. Site Conditions		S۱	VPPP Or	Site: Y	es 🗌 No 🗆	DMR's	On Site: Yes 🗌 No 🗌
		Conditio	n Range			Con	nments/Corrections Needed
	Great	Good	Fair	Poor			
E & S Control							
On-Site Storage							
Equipment/ Vehicles							
Roadways							
Air Pollution							
Discharge		rging: Y	/ N				
Monitoring	pH:						
Additional Comm	nents on	Site Cond	litions:				Site Corrections:
							Due Date:
							Days 1wk 2wk 3wk
							Sign:
Inspector							
· ·			c:	ianatur	· ·		Dato
Name:			31	gnature	e:		Date:

POURING OUR HEART & SOUL INTO EVERY JOB

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

DNREC 24 HR RELEASE HOTLINE 800-660-8802

NATIONAL SPILL RESPONSE CENTER (800) 424-8802

Appendix C

SECONDARY CONTAINMENT INSPECTIONS

A visual inspection by a facility employee shall be conducted before accumulated storm water is released from a secondary containment structure. The secondary containment structure shall be visually observed for color, foam, visible sheen and dry weather flow prior to release. Accumulated storm water shall be released if found to be uncontaminated by the material stored within the containment area. Records documenting the individual making the observation, the description of the accumulated storm water and the date and time of the release shall be maintained.

DATE	PETROLEUM PRESENT (Yes/No)? If yes, see note at bottom of log	OTHER OBSERVATIONS	WATER RELEASED? (Yes/No)	EMPLOYEE INITIALS

^{*}If accumulated storm water appears to be contaminated, **do not discharge** storm water onto the surrounding area. The contaminated water must be pumped into an appropriate container for proper disposal.

Appendix D

INVENTORY OF SPILLS AND LEAKS

Directions: Record below all spills and leaks of industrial materials that have occurred at the facility in three years prior to the effective date of this permit. The list of spills and leaks shall be updated annually. If no spill or leak occurs during any calendar year then this shall also be recorded. For the purpose of this record, a spill or leak is defined as: Any spill or leak that has the potential to discharge into a storm water conveyance system or water body of the State of Delaware.

Year:										
Date	Spill	Leak	Location	Type of Material	Quantity	Source	Reason	Amt. of Material Recovered	Material No Longer Exposed to Storm Water (true/false)	Preventative Measures Taken
No spills										
Year:	•				-		•			
No spills										

APPENDIX E

Record Review

Inspection Items	YES/NO or N/A	Recommended Actions
Copy of SWPPP On-Site		
SWPPP Up to Date and Accurate		
Training Records		
Inspections Records		
Monitoring Data (Quarterly Visuals and Analytical)		
Spill Records		

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?		
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 inspections been conducted and have form been completed and 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		Deter
Name:Signature:		Date:
Title:		

APPENDIX H

SWPPP MODIFICATIONS

Date	Comments	Signature

Appendix J: Semi-Annual Analytical Log

Sample Location				
Quarter/Year: Date / Time Collected:		Date / Time Examined:		
Collector's Name				
& Title				
Examiner's				
Name & Title				
Parameter	Parameter Description	Parameter Characteristics		
	Does the stormwater appear to have any	If Yes, describe: Yellow Brown Red Gray		
Color	color?	Other:		
	Yes No (Clear)			
	Is the stromwater not clear?	If not clear, which of the following best		
Clarity		describes it? Suspended Solids Milky/Cloudy		
	Yes No	Opaque Other:		
	Can you see a rainbow effect or sheen on the	Which best describes the sheen?		
Oil Sheen	water surface?	Rainbow sheet Floating oil globules		
	Yes No	Other:		
	Does the sample have an odor?	If yes describe: Chemical Musty Rotten Eggs		
Odor		Sewage Sour Milk Oil/Petroleum		
	Yes No	Other:		
	Is there anything on the surface of the	If Yes, describe: Suds Oily Film Garbage		
Floating Solids	sample?	Sewage Water Fowl Excrement		
	Yes No	Other:		
	Is there anything suspended in the sample?	Describe:		
Suspended				
Solids	Yes No			
	Leave sample undisturbed for	30 minutes		
	Is there anything settled on the bottom of	Describe: (note type, size, & material after sample		
Settled Solids	the sample?	is not disturbed for 30 min)		
	Yes No			
	Does foam or material form on the top of the	Describe:		
Foam	sample surface if you shake it?			
	Yes No			
•	ible indicators of pollution identify (1) where the	pollution may come from and (2) any corrective		
actions taken.				
Stampaniaton Callagtan's Cignatura and Data.				
Stormwater Collector's Signature and Date:				
Stormwater Examiner's Signature and Date:				