ATTACHMENT-13

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STORMWATER POLLUTION PREVENTION PLAN

Barnhardt Manufacturing Company
247 Main Road
Colrain, MA 01340

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Project: 3958

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STORMWATER POLLUTION PREVENTION PLAN

Barnhardt Manufacturing Company
247 Main Road
Colrain, MA 01340

1.0 INTRODUCTION

Barnhardt Manufacturing Company (BMC) is located at 247 Main Road in Colrain, Massachusetts (the Facility). The Facility is owned by BMC, 1100 Hawthorne Lane, Charlotte, NC 28205. The Facility is a cotton bleachery with an associated steam generating plant and Wastewater Treatment Plant (WWTP). The Facility's WWTP handles waste from 21 surrounding residences, the Facility itself and process water from the bleachery.

The Facility withdraws water from the North River, which is used in the manufacturing process and treated through the on-site WWTP. The WWTP returns the treated water back to the North River under National Pollutant Discharge Elimination System (NPDES) Permit No. MA0003697 (the "Permit"), dated March 1, 2018.

As a result of effluent discharge from the WWTP to surface waters, the EPA issued NPDES Permit Modification No. MA0003697 (the "Permit") on March 1, 2018. This Permit allows BMC to continue to discharge process water treated at the on-site WWTP to the North River.

The Facility operates under the United State Environmental Protection Agency's (EPA) Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity (effective May 27, 2009) for Industrial Activities, Sector V – Textiles Mill, Apparel, and Other Fabric Products. A renewed MSGP Permit became effective June 4, 2015 and required the preparation of a Stormwater Pollution Prevention Plan (SWPPP). On October 10, 2015, the Facility's Notice of Intent (NOI) was approved. A copy of October 2015 NOI is provided in Appendix A.

On May 4, 2020, EPA notified the Facility that 2015 MSGP was to expire on June 3, 2020, at 11:59 pm Eastern Time. EPA was unable to issue a new permit prior to the expiration date of the 2015 MSGP.

The 2015 MSGP was administratively continued in accordance with the Administrative Procedure Act and 40 CFR 122.6 and remains in force and in effect for discharges that were covered prior to expiration. Per Part 1.2.2 of the 2015 MSGP, authorization to discharge under the 2015 MSGP will automatically remain covered after the 2015 MSGP expiration date until EPA issues a new MSGP. Facilities with coverage under the administratively continued 2015 MSGP are required to continue to comply with 2015 MSGP in full.

Under the March 2018 Modified NPDES Permit, the Facility is required to develop a plan which establishes Best Management Practices (BMPs) that are to be followed as part of the Facility's operation, the cleaning of any equipment, and disposing of any liquid and solid waste. The purpose of the Facility's BMP Plan is to identify and describe the practices which minimize the amount of pollutants (biological and chemical) discharged to surface waters.

Figure 1 is a Locus Map and shows the approximate location of the Facility on a U.S. Geological Survey Map. Figure 2 is an aerial view of the Facility. Figure 3 is a Flood Insurance Rate Map (FIRM). Figure 4 presents the Massachusetts Department of Environmental Protection (MassDEP) Priority Resource Map as obtained from Massachusetts Geographical Information System (Mass GIS) in June 2020, depicting the Site and surrounding area. Figure 5A and Figure 5B depict the Facility, the locations of Facility buildings, aeration basin, and other relevant Facility features.

As defined by the Massachusetts contingency Plan (MCP; 310 CMR 40.0000), the Facility is in an area defined as the Zone II of a Public Drinking Water Supply Well, which is "that area of an aquifer which contributes water to a well under the most severe pumping and recharge conditions that can be realistically anticipated ..."

1.1 STATEMENT OF SWPPP POLICY AND OBJECTIVES

The objective of this SWPPP is to describe Facility work practices that are aimed at reducing the amount of pollutants (biological and chemical) discharged via stormwater from the Facility to the surface waters of the North River. This includes daily operation and maintenance practices utilized throughout the Facility, including the cleaning of any equipment, disposal of liquid and solid waste, and the operation of the Facilities WWTP in support of the NPDES Stormwater MSGP.

1.2 SWPPP REQUIREMENTS

The primary requirements of the SWPPP include

- identification of sources of pollution potentially affecting the quality of stormwater discharges associated with industrial activity at the Facility.
- implementation of BMPs to minimize the discharge of pollutants in stormwater.
- satisfying the non-numeric technology based effluent limitations included with this permit, which are associated with industrial activity from the Facility.
- ensuring compliance with the terms and conditions of the NPDES permit.

To achieve these objectives and comply with SWPPP requirements, the Facility evaluated potential pollution sources and selected appropriate measures to prevent or control the discharge of pollutant sources in stormwater. This process involves the following steps:

- Formation of a team of qualified personnel responsible for developing, implementing, and sustaining an adequate SWPPP for the Facility.
- Development of a comprehensive Site description which includes the activities at the Facility.
- Identification of the potential pollutant sources at the Facility.
- Evaluation for elimination or control of potential pollutant sources.
- Selection and implementation of appropriate BMPs and controls.
- Development of necessary inspection/monitoring programs.
- Annual training of all site personnel by the Environmental Health and Safety (EHS) Manager to insure adequate understanding of SWPPP requirements.
- Periodic evaluation of the effectiveness of the SWPPP and preparation of updates, as necessary.

During the months of July and August 2014, the Facility's EHS Manager performed a comprehensive Site evaluation. The Site evaluation consisted of a detailed inspection of all areas of the Facility to identify potential stormwater paths, non-stormwater discharges, potential pollutants, and existing controls. On August 6, 2014 and August 22, 2014, stormwater flows from rain events were mapped and noted.

Since the August 2014 stormwater flow assessment, construction activities, and/or changes in design, operation and maintenance that would significantly changed the patter of stormwater flow have not occurred. The results of this evaluation are tabulated in Appendix B with flows shown on the Figure 5A and Figure 5B.

The following Table 1 provides a cross reference between the requirements listed under Section 5.2 of the MSGP and the salient section(s) of the SWPPP.

Table 1 – MSGP AND SWPPP CROSS REFERENCE TABLE

MSGP REQUIREMENT	SWPPP SECTION(S)
Stormwater Pollution Prevention Team	Section 2.0
Site Description	Section 3.0
Summary of Potential Pollutant Sources	Section 5.0
Description of Control Measures	Section 4.0 and Section 7.0
Schedules and Procedures	Section 11.0
Documentation to Support Eligibility Consideration Under Other Federal Laws	Section 15.0
Signature Requirements	Section 1.0

1.3 MANAGEMENT APPROVAL

The responsible party for management and implementation of this SWPPP is:

Barnhardt Manufacturing Company
Lewis Barnhardt, President/COO
1100 Hawthorne Ln, Charlotte, NC 28205
Phone: (704) 906-9245

This SWPPP has been prepared in accordance with sound engineering practices and has the full approval of BMC management at a level of authority to commit the necessary resources to fully implement this SWPPP. This SWPPP has been prepared to meet the requirements of the MSGP and to reduce the pollutants discharged in stormwater to the extent practical. This management approval has been signed and certified in accordance with the requirements set forth under the provisions of the Clean Water Act (CWA).

In accordance with Appendix B, Subsection 11 of the MSGP, a corporation means: A responsible corporate officer. For the purpose of this subsection, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned.

_____	_____
Signature	Print Name
_____	_____

1.4 EXISTING ENVIRONMENTAL MANAGEMENT PLANS

The Facility has in place several plans which support and/or supplement the goals of the SWPPP. A current Spill Prevention, Control and Countermeasure (SPCC) Plan is maintained alongside the SWPPP in the EHS Manager's Office. A copy of the SPCC Plan is included as Appendix C.

The Facility also maintains an up to-date Emergency Response Manual that details response scenarios in the event of an emergency. A copy of the Emergency Response Manual is included in Appendix D.

As part of the Facility's Safety Program, the Hazard Communication Program, requires that all applicable Safety Data Sheets (SDS) for chemicals and materials stored or utilized at the Facility are maintained in the production office. If/when the Facility introduces new chemicals and/or equipment, a Chemical/Equipment Review Form is utilized and includes a review of compliance with the Permit and MSGP.

Any contractors working at the Facility are required to submit documentation for any chemicals used while on-site. These chemicals are also subject to the Chemical/Equipment Review Form. A copy of the EPA's MSGP for Stormwater Discharges Associated with Industrial Activity is maintained with a copy of this SWPPP.

1.5 PLAN AMENDMENT

Where corrective actions result in changes to any of the controls or procedures documented in the SWPPP, the Facility must modify the SWPPP accordingly within **14 calendar days** of completing corrective action work. Per the MSGP Permit, this SWPPP shall be amended under the following circumstances:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by the MSGP or NPDES Permit #MA0003697) occurs at the Facility.
- It is determined by self-evaluation or EPA audit that the control measures selected are not stringent enough for our discharge to meet applicable water quality standards.
- It is determined during routine inspections and/or assessment that control(s) were not installed correctly and/or properly maintained.
- Visual assessments of the stormwater indicate obvious signs of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).
- Construction or a change in design, operation, or maintenance at the Facility that significantly changes the nature of pollutants discharged in stormwater, or significantly increases the quantity of pollutants discharged.

Any of the following actions will trigger an amendment of the SWPPP:

- There is a change to the composition of the stormwater pollution prevention team (see Section 2.0) or change of responsible officer.
- There is an introduction of a previously unidentified potential pollutant or path of potential pollution at the facility.

Any amended and/or modified versions of the SWPPP shall be re-certified and signed by the permittee in accordance with the requirements identified in 40 CFR §122.22. Amendments and revisions shall be noted in the Revision/Amendment Log.

Rev. No.	Amend. No.	Date	Page(s)	Certified (Y or N)	Reason for Change

2.0 STORMWATER POLLUTION PREVENTION PLAN TEAM

In accordance with Section 5.2.1 of the MSGP, the Facility must identify the staff members (by name or title) that comprise the Facility's stormwater pollution prevention team as well as each team members individual responsibilities. The stormwater pollution prevention team is responsible for overseeing development of the SWPPP, any modifications to it, and for implementing and maintaining control measures and taking corrective actions when required. Each member of the stormwater pollution prevention team must have ready access to either an electronic or paper copy of applicable portions of this permit, the most recent copy of the SWPPP, and other relevant documents or information that must be kept with the SWPPP.

The stormwater pollution prevention team will be comprised of the personnel noted below. Names and contact information of individuals currently in the positions indicated are provided in Table 2.

Table 2 – STORMWATER POLLUTION PREVENTION TEAM

TITLE	NAME	CONTACT INFORMATION
DIRECTOR OF OPERATIONS	Tom Robinson	Phone: (704) 376-0380 tom.robinson@barnhardt.net
FACILITY/MAINTENANCE MANAGER	Mark Thibodeau	413-624-3471 x3720 – Office 413-624-3232 – Off Hours mark.thibodeau@barnhardt.net
ENVIRONMENTAL, HEALTH AND SAFETY MANAGER	Tim Mosher	413-624-3471 x3701 – Office 413-768-0812 – Off Hours tim.mosher@barnhardt.net
EMERGENCY RESPONSE CONTRACTOR	Western Mass Environmental – Matthew Murphy	413-788-2622 – 24 Hr.

2.1 DIRECTOR OF OPERATIONS

The Director of Operations has overall responsibility for the implementation of the SWPPP and is responsible for:

- Overall operations of the Facility in accordance with this SWPPP, including inspections, proper housekeeping, and general maintenance; and
- Overall supervision during any emergency response event.

2.2 FACILITY/MAINTENANCE MANAGER

Facility/Maintenance Manager and other-directed personnel are primarily responsible for the overall implementation of the SWPPP, provide recommendations to management in support of SWPPP policy, and provide the initial response to a chemical spill at the Facility.

In the event of an oil spill, the department personnel in the vicinity where the release occurred will respond in accordance with the SPCC Plan.

The Immediate Facility Supervisor has overall responsibility for responding to spills and initiating response actions. The Facility provides an annual training session that discusses emergency response procedures in the event of a chemical and/or oil spill.

Spill kits of cleanup equipment for oil and/or hazardous material shall be maintained at the Facility and are designated for review of materials during monthly Site inspections by BMC personnel. These spill kits should include the following items or their equivalents in volumes appropriate for the location in which it is to be stored for use:

- Rolls, booms, and pads of absorbent material.
- Granular absorbent materials.
- Neutralizing agent.
- Drain mat blockers.
- Caution tape.
- 55-gallon drum containers.
- Shovels, brooms, boots, and gloves.

Facility personnel are responsible for checking the spill kits for completeness during scheduled inspections, and shall be restocked following each use. The Facility has the responsibility of maintaining an adequate supply of spill response materials. Additional items may be added to the spill kits as deemed necessary.

The Facility maintains spill kits in the warehouse, receiving dock), maintenance shop, boiler building (near chemical storage), WWTP (near chemical storage), lower deck of the bleachery (near chemical storage), upper deck of the bleachery (near kiers) and fuel unloading area.

2.3 ENVIRONMENTAL HEALTH AND SAFETY MANAGER

The EHS Manager is responsible for:

- Preparation of this SWPPP and periodic evaluation and updating, as necessary.
- Ensuring periodic inspections of activities and material storage are completed to ensure that contaminants are not exposed to storm water, which may result in storm water contamination.
- Facility assessments/inspections in accordance with the SWPPP,
- Conducting an annual Comprehensive Site Compliance Evaluation.

- Coordinating training and storm water monitoring activities.
- Providing compliance guidance to Facility personnel during an emergency response event.
- Direct supervision during any emergency response event.

2.4 EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor can be contacted to respond to Facility specific environmental emergencies, such as chemical or fuel spills and leaks that are beyond the response capabilities of Facility personnel. Emergency response contractor(s) may also aide the Facility in the management of waste, if/as necessary.

3.0 FACILITY LOCATION

The Facility is located at 247 Main Road in Colrain, Massachusetts (Figure 1). The latitude and longitude for the Facility are approximately 42°39'20" north and 71°42' 55" west, respectively. The UTM coordinates are Zone 18T, 687254 mE and 4725104 mN. The elevation of the Facility is approximate 500 feet above mean sea level.

3.1 PROPERTY DESCRIPTION

The Facility consists of a cotton bleachery with an associated steam generating plant and WWTP that receives municipal waste from 21 surrounding residences, the Facility itself and process water from the bleachery. The Facility's location has been an industrial site for processing and/or weaving of cotton since the 1830's.

The Facility withdraws water from the North River that is used in the manufacturing process and treated through the on-site WWTP. The WWTP returns the treated water back to the North River under Permit (March 1, 2018).

The Property is relatively flat, however there is moderate incline in elevation near Main Road (Route 112). The Facility is situated on approximately 10.52 acres. The Facility leases an adjacent inactive portion of approximately 5.26 acres. Portions of the Site are in a FEMA Flood Zone A7 (100-year flood) and B (500-year flood) (Figure 3). All outdoor tanks or other outdoor storage structures within this area are anchored to prevent floating in the event of a flood.

3.2 CLIMATE

Massachusetts has a mainly humid continental climate (Köppen climate classification Dfb) with warm, humid summers and cold, snowy winters. Three climatic divisions prominently split the state. The Western region consists of low mountains of the Berkshire Hills and the Taconic Range. Massachusetts lies in the belt of prevailing westerlies, with various air masses interacting with each other regularly. Temperature ranges vary significantly, daily, and annually, and even in the same season over the years. Summers have comfortable temperatures between 70°F (21.1°C) to 85°F (29.4°C) at the peak of July. Five to fifteen hot days, with temperatures more than 90°F (32.2°C), are typical, but the nights remain mild. Winter temperatures vary significantly across regions, with five to fifteen days of subzero temperatures in the western mountains. Spring is wet and transitions from cold to warm with the advance of the season. Autumn is temperate, but the latter part of the season often encounters frost and ice. The average annual rainfall in Massachusetts ranges from 40" along the coast to 50" in the western region. The distribution of rainfall is even throughout the year, and there are no dry or wet periods. Thunderstorms bring local precipitation in the summer, while winter storms bring icy rain and snow. Snowfall is heavy in the winter and ranges from 25" over Cape Cod to 80" in the western portion of the state. Two hundred days in the year are sunny to partly sunny, with a cloud cover of less than 80%. Frost is a regular occurrence in the winter and lasts from the latter part of the fall to early spring in many places.

In August 2011, Hurricane Irene resulted in the Facility experiencing flooding of up to 5 feet. According to the United States Geological Survey (USGS), estimates of the areal extent of flooding corresponding to the 1-percent annual exceedance probability (AEP [also referred to as the 100-year flood]) and the peak flow of the tropical storm Irene flood in August 2011, was greater than the 0.2-percent AEP flood, also referred to as s 500-year flood.

3.3 SENSITIVE RECEPTORS

According to the MassDEP Phase I Site Assessment Map provided (Figure 4), the Facility is located within Zone II of a Public Drinking Water Supply Well, which is “that area of an aquifer which contributes water to a well under the most severe pumping and recharge conditions that can be realistically anticipated.” The North River, which abuts the Facility to west, is classified as a Class B waterbody. The tailrace is supplied from Kendall Dam #1, located approximately 1 mile north of the Facility.

The water from the tailrace enters the Facility through a culvert beneath Main Road (Route 112) and re-surfaces briefly in a concrete drainage swale at the northwest corner of the bleachery. The tailrace then enters a 72" channel which runs beneath the Site and exits adjacent to Main Road (Route 112). The tailrace rejoins the North River just upstream of the Main Road (Route 112) bridge which is located immediately south of the Facility. Areas of wetlands are located on the southern portion of the Facility at the confluence of the tailrace and North River. National Heritage and Endangered Species Program (NHESP) has not designated the Facility or surrounding areas for Priority Habitats of Rare Species and Estimated Habitats of Rare Wildlife. No additional environmental receptors were identified in the immediate vicinity of the Site.

4.0 SURFACE DRAINAGE AND RUNOFF

The Facility's stormwater conveyance system (SWCS) is comprised primarily of an underground network of pipes, catch basins, and drain lines located throughout the Facility. Stormwater dissipation in inactive areas on the Facility relies on ground infiltration and evaporation. Allowable non-stormwater runoff on inactive portions of the Facility is limited to uncontaminated condensate from natural gas delivery lines. There are no prohibited non-stormwater runoffs at the Facility.

Apart from the outfalls described below, no other runoff reaches the North River. Stormwater flow paths and the Facility's SWCS are shown on Figure 5A and Figure 5B. The Facility utilizes six outfall pipes that receive and ultimately discharge stormwater offsite. The six outfall pipes of the SWCS are representatively sampled and monitored under the Facility's MSGP. The estimated runoff coefficient for the Facility, based on the calculated values for a light industrial area, is 0.50 to 0.80. The six outfall locations are numbered 2 through 7 and are summarized below:

4.1 OUTFALL-2

Outfall-2 is located immediately northwest of the bleachery inside the east wall of the concrete drainage swale. Outfall-2 receives stormwater from catch basin CB-1 located at the loading dock adjacent to the northeast corner of the bleachery. Outfall-2 also receives stormwater from an underground pipe that discharges roof runoff from the office area into CB-1.

CB-1 typically contains an open gate valve that is closed when Facility personnel are transferring chemicals at the loading dock. Outfall-2 discharges into the 72” channel that is part of the tailrace system. As previously discussed, the tailrace ultimately discharges to the North River.

4.2 OUTFALL-3

Outfall-3 is located immediately west of the bleachery and receives stormwater from two catch basins (CB-5 and CB-6) below the loading docks on the west side of the bleachery. Catach basins CB-5 and CB-6 are located atop a concrete trench and receive stormwater from the asphalt paved parking area west of the bleachery. Stormwater is then discharged to the 72” channel at manhole MH-1. The 72” channel is part of the tailrace system which ultimately discharges to the North River.

4.3 OUTFALL-4

Outfall-4 receives stormwater runoff from catch basins CB-4, CB-7, and CB-8, which are located in the asphalt paved parking area approximately 46-feet west of the bleachery. Outfall-4 also receives stormwater runoff generated as a result of hydrant flushing. Outfall-4 drains into the 72” channel at a manhole MH-1. The 72” channel is part of the tailrace system which ultimately discharges to the North River.

4.4 OUTFALL-5

Outfall-5 is a 6-inch steel pipe with a normally open gate valve, located between the screen building and the aeration basin retaining wall. The gate valve is closed when Facility personnel are transferring chemicals at the screen building. Runoff from the asphalt paved parking area travels via sheet flow to Outfall-5, where stormwater is discharged via the 6-inch pipe to the tailrace via a drainage swale consisting of half-inch trap rock. Stormwater runoff is discharged via the drainage swale into a concrete box (for erosion control) before spilling into the tailrace just downstream of the outlet of the 72” channel.

Prior to September 1, 2019, stormwater runoff was discharged to a paved flume. As part of response actions related to the sulfuric acid release (see Section 10.1), the asphalt paved flume was removed, and soil was excavated.

Restoration activities consisted of filter fabric and half-inch trap rock. Remaining areas of exposed soil were loamed and seeded, and an erosion control blanket were placed over top.

4.5 OUTFALL-6

Outfall-6 is a 6-inch steel pipe with a normally open gate valve located in a concrete headwall at the bank of the North River, west of the WWTP. Outfall-6 collects runoff from the asphalt paved parking area and roof drains located on Buildings 118 and 119. Stormwater is discharged via Outfall-6 to the eastern bank of the North River.

4.6 OUTFALL-7

Outfall-7 is comprised of two breaks in the west wall of the concrete drainage swale immediately northwest of the bleachery. Outfall-7 receives stormwater runoff from a depression in the landscaped area north and west of the bleachery. Outfall-7 discharges into the 72" channel which is part of the tailrace system. The tailrace ultimately discharges to the North River.

As outlined in the 2015 NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) Forms (2015 NOI e-Submittal) provided in Appendix E, Outfall-7 is comprised of two essentially identical outfalls at each end of a concrete wall. Monitoring shall be performed at the southern end during the first and third quarters and at the northern end during the second and fourth quarters.

4.7 OTHER DRAINAGE FEATURES

An asphalt area between the bleachery, hydrogen peroxide aboveground storage tank (AST) and bulk water storage building, drains to catch basins CB-2 and CB-3 which ultimately discharge to the WWTP. This paved area is broken into two recessed areas with a bituminous berm boundary. The paved surface area that is bounded by the berm to the south, the Bleachery (Building No. 134) on the east, concrete wall on the west, and bituminous curb on the north.

Catach basins CB-9 and CB-10, which are located immediately west and east of building 118 respectively, receive stormwater runoff from the surrounding area. Catch basins CB-9 and CB-10 are not connected to the Facility's SWCS or WWTP. Stormwater that enters CB-9 and CB-10 is discharge to a dry well system.

5.0 POTENTIAL POLLUTANT SOURCES AND PATHWAYS

5.1 FACLITY PROCESS

The Facility is an active raw cotton processing plant that provides clean, bleached cotton to clients. The process consists of separating raw cotton bales into loose fiber, which is blown through an overhead conveyance system between building 118 and the bleachery. The cotton fiber is cleaned of non-organic material, wetted, and pressed into cakes. The cakes are processed in pressurized and heated (steam) kiers which use caustic and other chemicals to break down organic matter. Hydrogen peroxide and soap are used to bleach and clean the cotton. The cotton is then dried and baled for shipment. Raw cotton bales are warehoused indoors along with minimal storage of finished bales.

Chemicals used in process treatment are delivered both in bulk and small containers (totes and drums). Bulk deliveries are received at outdoor loading docks. Smaller containers are received at the loading docks and transported to various other locations at the Facility using a fork truck.

Process water is taken from the North River and routed through a labyrinth for settleable solids removal, then pumped through a sand filtration system before entering the manufacturing process. Used process water is passed through a heat recovery system before being sent to the WWTP collection tanks.

There is a steam plant on Site to provide steam for the kiers and winter heat for the buildings. The main boiler runs off natural gas with a backup capability to run on ultra-low sulfur diesel (ULSD). The auxiliary boiler runs on #2 fuel oil only. Oil is stored in four (4) 20,000 gallon above ground double walled storage tanks, one of which is insulated and heated with steam. The steam is routed to the various buildings through insulated pipe on overhead pipe bridges. There is a back-up generator located in building 117 which runs off diesel stored in a 500-gallon AST.

A maintenance shop is housed in building 118 and performs repair and fabrication of parts for plant equipment. An air compressor supplies air to all the buildings.

5.2 WASTEWATER TREATMENT PLANT

Industrial wastewater discharged from the bleachery flows by gravity via two separate pipelines to the collection manhole SMH-8. Sanitary wastewaters from the various lavatories located within the production buildings are carried through the same pipeline system as industrial wastewater. Sanitary wastewaters from 21 of the surrounding residences in the Village of Griswoldville enter Manhole SMH-8 by gravity through a separate 6-inch cast iron pipeline.

The discharge pipes connect to the wet well splitter box/influent pump station, and the four concrete underground storage tanks (USTs). The USTs consist of four concrete basins interconnected to act as one large storage vessel. Instantaneous discharge quantities may exceed the capacity of the activated sludge process. In this case, the wastewater will fill the wet wells and surcharge (overload and back-up) into the four, 5,000-gallon concrete USTs. These USTs serve as surge vessels.

Wastewaters flow from the collection manhole and/or the underground storage tanks flow to a splitter box located in the screen building. The function of the splitter box is to allow wastewater to enter either one or both wet wells according to the desired method of operation. The wet wells have a combined storage capacity of approximately 10,000 gallons.

Two recessed impeller flooded suction centrifugal pumps, pump the raw (untreated) wastewater from the wet wells to the screen units. Each wet well has two valved outlets, combining in a single suction header. Two suction lines, one to each raw wastewater pump, take suction from the header pipe.

The raw wastewater pumps transport the untreated waste to the top floor of the screen building. Six wedge-wire hydrosieves (screens) remove coarse solids from the waste stream. During the screening process coarse solids are removed.

Screened wastewater flows by gravity to the aeration basin which is divided into two sections. The aeration basin measures approximately 320 feet X 155 feet with a maximum depth of 17 feet. Maximum capacity of the aeration basin is 3.3 million gallons, with a minimum capacity of 1.5 million gallons.

Two secondary clarifiers are employed to receive the mixed liquor overflow from the aeration basin. The clarification process separates liquid and solid phases of the mixed liquor. This allows the sludges (solid phase) to be removed from the treatment process, or to be returned to the aeration basin as determined by the operator and the clarified liquid to overflow the tanks for discharge.

5.3 SLUDGE STORAGE

Sludge generated by Facility operations is stored within with WWTP building. Sludge is transported via a belt press into a poly-lined roll-off container that is stored inside of the WWTP building. The belt press drop-off point is the last point in the stabilization process. Roll-off containers are collected by a private third-party on an approximate weekly basis, but occasionally as-needed. The collected sludge is managed off-site by the third-party and is used for soil amendment purposes. The full roll-off container is removed and exchanged for an empty one.

6.0 INVENTORY OF MATERIALS

Based on current Facility operations, controls, potential pollutants in stormwater discharge are expected to be limited to:

- minor petroleum leaks from on and off-road equipment, truck traffic, and employee and visitor vehicles;
- minor leaks from outdoor repair or maintenance of leased material handling equipment;
- minor spills from bulk loading of chemicals;
- minor spills from transfer of waste oil to outdoor storage container;
- minor spills from addition of chemical to the WWTP aeration basin or clarifiers; and
- minimal cotton fiber escaping from screened building exhaust vent and air filtration systems.

Given the nature of the Facility operations moderate to major spills of oil and/or hazardous material may occur, however the appropriate mechanisms have been put in place to ensure that if a spill were to occur, the situation is managed appropriately.

Table 3 presents a list of activities exposed to stormwater and an inventory of materials and pollutants associated with those activities along with the quantity stored, the method of storage, and a description of material management practices. Table 3 will be reviewed and updated as required to reflect changes in the types and quantities of chemicals stored at the Facility. SDS for chemicals utilized at the Facility are maintained in the Production Office.

Table 3 – ACTIVITIES ASSOCIATED WITH HAZARDOUS SUBSTANCES EXPOSED TO STORMWATER

ACTIVITY	POLLUTANT	AMOUNT (GALLONS)	STORAGE METHOD	ASSOCIATED BMP
Chemical Unloading	Hydrogen Peroxide	5,000	Tank Truck	HK-14, HK-22, HK-24, HK-25
	Sodium Hydroxide	5,000	Tank Truck	HK-14, HK-22, HK-24, HK-25
	Sulfuric Acid	5,000	Tank Truck	HK-14, HK-22, HK-24, HK-25
	Surfactant	5,000	Tank Truck	HK-14, HK-22, HK-24, HK-25
	Chelator	5,000	Tank Truck	HK-14, HK-22, HK-24, HK-25
	Sodium Bisulfite	5,000	Tank Truck	HK-14, HK-22, HK-24, HK-25
Petroleum Unloading	#2 Fuel Oil	8,500	Tank Truck	HK-02, HK-14, HK-22, HK-24, HK-25, ME-08
	#2 Diesel	8,500	Tank Truck	HK-02, HK-14, HK-22, HK-24, HK-25, ME-08
Chemical Storage	Hydrogen Peroxide	10,000	Single Walled Tank	HK-02, HK-03, HK-04, HK-22, HK-24, HK-25
	Sulfuric Acid	900	One 300-gallon Day Tank, Three 200-Gallon Double Walled	HK-02, HK-03, HK-04, HK-22, HK-24, HK-25

ACTIVITY	POLLUTANT	AMOUNT (GALLONS)	STORAGE METHOD	ASSOCIATED BMP
			Polyethylene Tanks	
Petroleum Storage	Ultra-Low Sulfur Diesel	80,000	Four 20,000-Gallon Double Walled Tanks	HK-02, HK-05, HK-22, HK-24, HK-25
	Diesel	500	Double Walled Tank	HK-02, HK-03, HK-05, HK-22, HK-24, HK-25
Waste Oil Storage	Waste Oil	55	55-Gallon Drum	HK-02, HK-24, HK-25, HK-26
Chemical Transport Within Facility	Antifoam 30L, Sulfuric 942 Polymer, Dispersall HP-2500 Polymer, Oxygen Scavenger, Volamine RL-202 Sulfite, Water Boiler Line Cleaner, Caustic, Mayoquest, Sodium Silicate,	55	55-gallon drum	HK-11, HK-17, HK-20, HK,21, HK-22, HK-24, HK-25, ME-07, ME-09, ME-10
	WWTP 2300 Polymer	250	250-Gallon Tote	HK-11, HK-17, HK-20, HK,21, HK-22, HK-24, HK-25, ME-07, ME-09

7.0 ACTIVITIES EXPOSED TO STORMWATER BY LOCATIONS

7.1 BLEACHERY (BUILDING NO. 134)

Interior storage tanks for sodium hydroxide, Lava Wash (surfactant), Dissolvine D-40 Chelator, sulfuric acid and sodium bisulfite are filled through exterior chemical fill connections at the northwest corner of the bleachery. A member of the Facility's stormwater pollution prevention team verifies there are no leaks in the connections upon start of transfer and transfer operations are monitored by the drivers and surveillance cameras in the boiler house. The impervious surface beneath the chemical fill connections are angled toward two catch basins, CB-2, and CB-3, which drain to the WWTP. Catch basin CB-3 is equipped with a gate valve, which can be closed during chemical transfer activities. All chemical supply trucks are equipped with spill kits.

The fire protection piping in the bleachery is tested annually and requires a partial draining of the system. This is accomplished through a half-inch spigot on the eastern exterior wall of the bleachery. The water travels via sheet flow across the asphalt paved surface and either evaporates, or if there is sufficient volume, is discharged via the Facility's SWCS.

7.2 BOILER HOUSE (BUILDING NO. 117) AND BULK STORAGE AREA

The fire protection piping in the boiler house is tested annually and requires partial draining of the system. This is accomplished through a half-inch spigot on the eastern exterior wall of the boiler house. The water travels via sheet flow across the asphalt paved surface and either evaporates, or if there is sufficient volume, is discharged via the Facility's SWCS.

Transfer operations for ULSD are monitored by the drivers and surveillance cameras in the boiler house. The impervious surface beneath the oil fill connections are angled toward the trench drain, located immediately south of the boiler house. The trench drain contains a gate valve that is closed during transfer. The trench drain is connected to the WWTP. All fuel delivery trucks are equipped with spill kits. Facility personnel inspect the four 20,000-gallon ULSD and 500-gallon #2 fuel oil ASTs monthly.

7.3 MAINTENANCE SHOP AND RAW COTTON HANDLING (BUILDING NO. 118)

The fire protection piping in the maintenance shop and raw cotton handling is tested annually, which requires a partial draining of the system. This is accomplished through a half-inch spigot on the eastern exterior wall of the building. The water travels via sheet flow across the asphalt paved surface and either evaporates, or if there is sufficient volume, is discharged via the Facility's SWCS. Maintenance on leased fork trucks and scissor lifts is occasionally performed by contract personnel in the area between building 117 and 118, in the area designated on Figure 5B. This location minimizes the distance between the work being performed and the waste oil storage area and provides protection in the event of a spill. Maintenance activities are not performed during rain events. A spill kit is located near the maintenance area to address minor spills if/as they occur.

The waste oil storage area is located outside of the maintenance shop in a waterproof plastic enclosure that also acts as a secondary containment. One 55-gallon drum of waste oil is stored in the cabinet and remains closed unless Facility personnel are transferring waste oil from 5-gallon pails. Transfer of oil occurs within the footprint of secondary containment. The waste oil enclosure is inspected on a routine basis under the SPCC. Waste oil is picked up by the Town of Colrain Department of Transportation and is used their waste oil fired furnace.

7.4 FILTER BUILDING (NO. 116)

No activities are performed at the filter building that could result in an unauthorized discharge to the waters of the North River via the Facility's SWCS.

7.5 WASTEWATER TREATMENT PLANT (BUILDING NO. 133)

The WWTP aeration basin and/or clarifiers periodically require the addition of the potassium permanganate to ensure complete oxidation. The addition of the potassium permanganate occurs at grated catwalks at the aeration basin and/or clarifiers. The potassium permanganate used by Facility personnel is stored inside the WWTP.

There are five Murdock style hydrants in the vicinity of the aeration basin that provide water for washing the aeration basin and the clarifiers. The water is sourced directly from the North River. Rinse water generated during the washing of the aeration basin and/or clarifiers is processed through the Facility's WWTP.

7.6 SCREEN BUILDING (BUILDING NO. 132)

Filling of the indoor sodium hydroxide tank is monitored by the driver and surveillance cameras in the boiler house. The impervious surface beneath the chemical fill connection is angled toward Outfall-5, located immediately south of the screen building. Outfall-5 contains a gate valve that is closed during transfer operations. Chemical supply trucks are equipped with spill kits. Facility personnel inspect the sodium hydroxide tank monthly.

The sodium hydroxide tank located in the screen building does not include secondary containment, however the floors of the screen building are pitched in such a manner that if sodium hydroxide were to be released, the sodium hydroxide would be directed to several interior drains that then discharge to the WWTP. The design of the screen building performs the role of secondary containment.

7.7 PUMP HOUSE (ANTHILL)

No activities are performed at the pump house that could result in an unauthorized discharge to the waters of the North River via the Facility's SWCS.

7.8 PARKING AREAS, GROUNDS AND DRIVEWAYS

Normal building and grounds maintenance activities include snow plowing, de-icing, maintenance of the SWCS, maintenance and repair of electrical and mechanical systems, and general housekeeping. Various chemical products, including paints, cleaners, oils, salts, and greases may be used during maintenance operations. In addition, transporting of 55-gallon drums of chemicals via fork truck between buildings occurs periodically. A comprehensive list identifying oil and hazardous materials which can be exposed to stormwater at the Facility is provided in Table 3.

Pipe bridges at the Facility route steam and air piping, cotton ductwork and electrical conduits over several paved areas at the Facility. Steam pipes and cotton ducts are insulated. The condition of the insultation is monitored by Facility personnel and replaced if/as needed.

While no sand is stored at the Facility, it is applied during winter storms and icy conditions by a third-party contractor. The sand used at the BMC facility is salt-free. Every spring, the contractor is called in to sweep the paved portions of the Facility to remove excess sand.

7.8.1 CATCH BASINS

The Facility maintains signage at each catch basin indicating the ultimate discharge location (e.g. “Drains to WWTP,” “Drains to River,” or “Collection Basin Only”). Facility personnel maintain and inspect the signage as part of the Monthly SWPPP Inspection to ensure legibility.

7.9 CONSTRUCTION ACTIVITIES

If construction related activities occur at the Facility that require alteration, transport or storage of soil and/or construction material, the following BMPs will be implemented (not limited to):

- Filing of a Request for Determination of Applicability (RDA) or Notice of Intent (NOI) for construction activities within one or more resource boundaries defined under the wetlands protection act (WPA), local bylaws and/or NPDES.
- Cover soil/debris stockpiles under secure poly sheeting or other temporary covering.
- When possible schedule excavation/grading work during dry weather.
- Immediately clean up leaks and/or spills related to on-Facility heave machinery.
- Identify all storm drains, drainage swales and surface water near the construction site and review requirements of SWPPP with subcontractors.
- Use terracing, rip rap, sandbags, rocks, straw bales, and/or temporary vegetation on slopes to reduce runoff velocity and trap sediments.
- Dispose of all waste properly. Many construction materials, including solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and cleared vegetation can be recycled.
- Train employees and subcontractors in erosion and runoff control procedures.

7.10 ROOF IMPACTS

The roof drain located above the offices at the bleachery is routed below grade and discharges into CB-1. Stormwater then travels via an underground pipe to Outfall-2. Apart from building 117, and one drain from building 118 and building 133, roof runoff is routed to asphalt paved surfaces at the Facility. One roof drain on the west side of building 118 is routed to an upland swale behind the building for infiltration into the surficial soils. A french drain around portions of building 119 discharges to the same area.

During times of significant precipitation, stormwater will travel via sheet flow to the asphalt paved area at the south end of the swale and run down the ramp to CB-9. Roof runoff from building 133 is discharged directly to the ground, into a recessed area between the building and a former containment area.

8.0 ALLOWABLE NON-STORMWATER DISCHARGES

The following are allowable non-stormwater discharges associated with the Facility:

- Uncontaminated condensate from roof and window air conditioning units.
- Uncontaminated condensate from natural gas piping.
- Uncontaminated condensate from Overflow Rinse Water tank (warm water tank)
- Uncontaminated condensate from Process Water Storage tanks (heated cold-water tanks).
- Process water overflow from the Anthill.
- Process water discharge from Murdock hydrants.

9.0 EROSION CONTROL

The Facility will evaluate the need for using Inlet Controls (e.g. silt sacks, biodegradable coir logs, sediment control logs, sand bags or other suitable alternative) at one or more of the six catch basins (CB-1 and CB-4 through CB-8) that receive stormwater runoff as part of Facility SWPP. The Facility shall train all applicable personnel on the appropriate installation and maintenance procedures to ensure the Inlet Controls achieve their intended purpose and remain effective during deployment periods. The need; use and condition of the Inlet Controls shall be documented in the Monthly SWPPP Inspection Form(s), as appropriate. Inlet controls shall be replaced in timely fashion, as needed to maintain the effectiveness of the control measure(s) during the deployment period(s).

10.0 POLLUTION DISCHARGE HISTORY

The EHS Manager compiles and maintains a list of spills at the Facility using the “Spill Incident Report Form.” A sample Spill Incident Report Form is provided in Appendix F. Completed copies of this form will be kept with the SWPPP for a minimum of five years.

10.1 SULFURIC ACID RELEASE

On September 1, 2019, a release of sulfuric acid occurred due to the failure of the former 4,500-gallon carbon steel AST, which was previously located on the eastern portion of the property, immediately southwest of the screen building. The details of this release condition, assessment and remediation can be found in regulatory submittals to MassDEP under Release Tracking Number (RTN) 1-20919 at https://eeaonline.eea.state.ma.us/portal#!/wastesite/1-0020919.

As part of assessment monitoring under MassDEP RTN 1-20919, a total of ten soil borings, six of which were completed as monitoring wells were installed at the site. These borings/wells were installed to evaluate soil and groundwater conditions related to the release. Soil samples were collected in January 2020.

Groundwater samples were collected in February and May 2020. The analytical data will be used to support the eventual completion of the Immediate Response Action (IRA) with MassDEP and the filing of a Permanent Solution under RTN 1-20919.

11.0 INSPECTION AND MONITORING PROGRAM

As required under the conditions of the MSGP, Facility personnel perform monthly inspections of the Facility and collect quarterly visual assessments of stormwater samples. Monthly SWPPP inspections and quarterly visual assessment are performed by the Facility's EHS Manager. Copies of the inspection forms are provided in Appendix G and Appendix H, respectively.

11.1 MONTHLY FACILITY INSPECTIONS

During normal Facility operating hours, the Facility shall conduct monthly inspections of areas covered by the requirements of the MSGP, including, but not limited to, the following:

- Areas where industrial materials or activities are exposed to stormwater;
- Areas identified in the SWPPP and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the past three years;
- Discharge points; and
- Control measures used to comply with the effluent limits contained in this permit.

At least once during each calendar year, the monthly inspection must be conducted during a period when a stormwater discharge is occurring. Inspections are performed by qualified personnel, with one member of the stormwater pollution prevention team participating. Facility personnel shall consider the results of prior inspections when planning and conducting inspections.

During the inspection Facility personnel shall consider the following:

- Industrial materials, residue or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks and other containers;
- Tracking of industrial or waste materials, or sediment where vehicles enter or exit;
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas;
- Control measures needing replacement, maintenance or repair.

An inspection that occurs during a stormwater event or discharge shall document control measures implemented to comply with the MSGP to ensure proper function. Facility personnel shall promptly address any problems identified during the inspections. Any corrective action(s) will be documented on the inspection form and completed as soon as reasonably possible. Copies of the inspections will be kept on record for a minimum of five years.

Any deficiencies identified during the visual inspections will be corrected as soon as possible, but not later than **14 days** after the inspections in accordance with the Section 4.2.7.2.1.5 of MSGP. The results of the inspections and/or corrective actions implemented at the Facility will be documented in the SWPPP.

11.2 QUARTERLY VISUAL ASSESSMENT OF STORMWATER DISCHARGES

Each quarter, Facility personnel collect a quarterly visual assessment sample from each of the Outfall locations. These samples are not required to be collected in accordance with 40 CFR Part 136 procedures but must be collected in such a manner that the samples are representative of the stormwater discharge.

The visual assessments are performed using:

- a clean, colorless glass or plastic container, and examined in a well-lit area;
- 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, samples collected as soon as practicable after the first 30 minutes. The reason why it was not possible to take the sample within the first 30 minutes is documented in the inspection form. In the case of snowmelt, samples are taken during a period with a measurable discharge; and

All required monitoring shall be performed during a storm event that results in an actual discharge from the Facility ("measurable storm event") and follows the preceding measurable storm event by at least 72 hours (three days). The 72-hour (3-day) storm interval does not apply if the Facility is able to document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period.

Facility personnel inspect and/or observe the sample for the following water quality characteristics:

- Color;
- Odor;
- Clarity (diminished);
- Floating solids;
- Settled solids;
- Suspended solids;
- Foam;
- Oil sheen; and
- Other obvious indicators of stormwater pollution.

Whenever the visual assessment shows evidence of stormwater pollution, Facility personnel shall initiate corrective action procedures.

11.3 FACILITY INSPECTION DOCUMENTATION

As required in Section 5.5 of the MSGP, Facility personnel will document all findings as it pertains to the monthly and quarterly inspections and maintain these finding with the SWPPP.

Results of the monthly and quarterly inspections are summarized and included in the annual report to the EPA (see Section 11.4). The Facility documents all findings, including but not limited to, the following:

- The inspection date and time;
- The name(s) and signature(s) of the inspector(s);
- Weather information;
- All observations relating to the implementation of control measures at the Facility, including;
    - A description of any discharges occurring at the time of the inspection;
    - Any previously unidentified discharges from and/or pollutants at the site;
    - Any evidence of, or the 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; and
- A statement signed and certified in accordance with Appendix B, Subsection 11 of the MSGP.

11.4 ANNUAL REPORT

In accordance with Section 7.5 of the MSGP, the Facility shall submit an Annual Report to the EPA electronically using NetDMR by January 30th for each year of permit coverage. The Annual Report shall contain information generated from the past calendar year.

The Annual Report must include a summary of the routine Facility inspections and quarterly visual assessment findings, corrective action documentation and any noncompliance observed, and, when applicable, the rationale for why it is believed that no further pollutant reductions are achievable when a four-quarter average benchmark is exceeded. Annual Reports must be submitted electronically (unless a waiver from electronic reporting has been granted).

11.5 ADDITIONAL REPORTING

In addition to the annual reporting requirements under Section 7.5 of the MSGP, the Facility is also subject to the standard permit reporting provisions of Appendix B, Subsection 12.

- Planned changes. The Facility must give notice to EPA as soon as possible, but no fewer than 30 days, of any planned physical alterations or additions to the permitted Facility. Notice is required only when:
    - The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or
    - The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42(a)(1).
- Anticipated noncompliance. The Facility must give advance notice to EPA of any planned changes in the permitted Facility or activity which may result in noncompliance with permit requirements.
- Transfers. This permit is not transferable to any person except after notice to EPA. Where a Facility wants to change the name of the permittee, the original permittee (the first owner or operators) must submit a Notice of Termination pursuant to Part 1.4 of the MSGP. The new owner or operator must submit a Notice of Intent in accordance with Part 1.3.1 and Table 1-2 of the MSGP. See also requirements in Appendix B, Subsections 11.B and 11.D of the MSGP.
- Monitoring reports. Monitoring results must be reported at the intervals specified elsewhere in the MSGP.
    - Pursuant to Part 7.1, all monitoring data collected pursuant to Part 6 must be submitted to EPA using EPA's online DMR system (http://www.epa.gov/netdmr/).
    - If the Facility monitors any pollutant more frequently than required by the MSGP using test procedures approved under 40 CFR Part 136 or as specified in the permit, the results of this monitoring must be included in the calculation and reporting of the data submitted in the DMR.
    - Calculations for all limitations which require averaging of measurements must use an arithmetic mean. For averaging purposes, use a value of zero for any individual sample parameter, which is determined to be less than the method

detection limit. For sample values that fall between the method detection level and the quantitation limit (i.e., a confirmed detection but below the level that can be reliably quantified), use a value halfway between zero and the quantitation limit.

- Compliance schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit must be submitted no later than 14 days following each schedule date.
- Twenty-four hour reporting.
    - The Facility must report any noncompliance which may endanger health or the environment. Any information must be provided orally within 24 hours from the time the Facility becomes aware of the circumstances. A written submission must also be provided within five days of the time the Facility become aware of the circumstances. The written submission must contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
    - The following shall be included as information which must be reported within 24 hours under this paragraph.
        - Any unanticipated bypass which exceeds any effluent limitation in the permit. (See 40 CFR 122.41(m)(3)(ii))
        - Any upset which exceeds any effluent limitation in the permit
        - Violation of a maximum daily discharge limit for any numeric effluent limitation. (See 40 CFR 122.44(g).)
    - EPA may waive the written report on a case-by-case basis for reports under Appendix B, Subsection 12.F.2 of the MSGP, if the oral report has been received within 24 hours.
- Other noncompliance. the Facility must report all instances of noncompliance not reported under Appendix B, Subsections 12.D, 12.E, and 12.F, at the time monitoring reports are submitted. The reports must contain the information listed in Appendix B, Subsection 12.F.
- Other information. Where the Facility becomes aware that it failed to submit any relevant facts in the NOI or submitted incorrect information in the NOI or in any report to the Permitting Authority, the Facility shall promptly submit such facts or information.

The Facility must submit the reports to the appropriate EPA Regional Office.

U.S. EPA Region 1
Office of Ecosystem Protection
Stormwater and Construction Permits Section
5 Post Office Square, Suite 100
(OEP 06-1)
Boston, MA 02109-3912

12.0 CORRECTIVE ACTIONS

When any of the following conditions occur or are detected during an inspection, the Facility will review and revise the SWPPP as needed:

- An unauthorized release or discharge.
- Control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.
- A required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained.
- Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

If corrective action is needed and to the extent feasible, Facility personnel will immediately take all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces to avoid continued discharge in subsequent storm events.

12.1 CORRECTIVE ACTION DOCUMENTATION

In accordance with Section 4.4 of the MSGP, Facility personnel shall document the existence of any of the conditions outlined in the above section within 24-hours of obtaining knowledge, the results of which will be included in the annual report. The following information shall be documented:

- Description of the condition triggering the need for corrective action review. For any spills or leaks, include the following information: a description of the incident including material, date/time, amount, location, and reason for spill, and any leaks, spills or other releases that resulted in discharges of pollutants to waters of U.S., through stormwater or otherwise;
- Date the condition was identified;
- Description of immediate actions taken pursuant to Section 4.3.1 to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date/time clean-up completed, notifications made, and staff involved. Also include any measures taken to prevent the reoccurrence of such releases (see Section 2.1.2.4); and
- A statement signed and certified in accordance with Appendix B, Subsection 11 of the MSGP.

13.0 STATE SPECIFIC REQUIREMENTS

In accordance with Section 9.1 of the MSGP, the Facilities in the Commonwealth of Massachusetts must meet the following conditions:

- Discharges covered by the general permit must comply with the provisions of 314 CMR 3.00; 314 CMR 4.00; 314 CMR 9.00; and 314 CMR 10.00 and any other related policies adopted under the authority of the Massachusetts Clean Waters Act, MGL c.21, ss. 26-53 and Wetlands Protection Act, MGL s. 40
- New facilities or redevelopment of existing Facilities subject to this permit must comply with applicable stormwater performance standards prescribed by state regulation or policy. A permit under 314 CMR 3.04 is not required for existing facilities which meet state stormwater performance standards. An application for a permit under 314 CMR 3.00 is required only when required under 314 CMR 3.04(2)(b) {designation of a discharge on a case-by-case basis} or is otherwise identified in 314 CMR 3.00 or any Massachusetts Department of Environmental Protection policy as a discharge requiring a permit application.
- Upon request, the Facility shall provide a copy of the SWPPP to MassDEP within 14 days of such request.
- MassDEP may conduct an inspection of the Facility covered to ensure compliance with state law requirements, including state water quality standards. MassDEP may enforce its certification conditions.

- The results of any monitoring [four samples required in the first year of the permit] required by the MSGP must be sent to the appropriate Regional Office of the Department [attention: Bureau of Waste Prevention] where the monitoring identifies violations of any effluent limits or benchmarks for any parameter for which monitoring is required under this permit. In addition, any follow-up monitoring and a description of the corrective actions required and undertaken to meet the effluent limits or benchmarks must be sent to the appropriate Regional Office.

14.0 RECORDKEEPING

The Facility shall retain copies of the SWPPP (including any modifications made during the term of the MSGP), additional documentation requirements pursuant to Section 5.5 of the MSGP (including documentation related to corrective actions taken pursuant to Section 4), all reports and certifications required by this permit, monitoring data, and records of all data used to complete the NOI to be covered by this permit, for a period of at least three years from the date that the coverage under this permit expires or is terminated.

14.1 ADDITIONAL RECORDKEEPING REQUIREMENTS

The Facility is required to keep the following inspection, monitoring, and certification records with the SWPPP that together keep Facility records complete and up-to-date, and demonstrate full compliance with the conditions of this permit:

- A copy of the NOI submitted to EPA along with any correspondence exchanged between the Facility and EPA specific to coverage under this permit;
- A copy of the acknowledgment received from the EPA assigning the Facilities NPDES ID;
- A copy of this permit (an electronic copy easily available to SWPPP personnel is also acceptable);
- Documentation of maintenance and repairs of control measures, including the date(s) of regular maintenance, date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure(s) returned to full function, and the justification for any extended maintenance/repair schedules (Section 2.1.2.3 of the MSGP);
- All inspection reports, including the Monthly Facility Inspection Reports (see Part 3.1.2 of the MSGP) and Quarterly Visual Assessment Reports (Section 3.2.2 of the MSGP);

- Description of any deviations from the schedule for visual assessments and/or monitoring, and the reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first 30 minutes of a measurable storm event) (Sections 3.2.3 and 6.1.5 of the MSGP);
- Corrective action documentation required per Section 4.4;
- Documentation of any benchmark exceedances and the type of response to the exceedance employed, including:
    - the corrective action taken;
    - a finding that the exceedance was due to natural background pollutant levels;
    - a determination from EPA that benchmark monitoring can be discontinued because the exceedance was due to run-on; or
    - a finding that no further pollutant reductions were technologically available and economically practicable and achievable in light of best industry practice consistent with Section 6.2.1.2.
- Documentation to support any determination that pollutants of concern are not expected to be present above natural background levels if the Facility discharges directly to impaired waters, and that such pollutants were not detected in the discharge or were solely attributable to natural background sources (see Part 6.2.4.1); and
- Documentation to support the claim that the Facility has changed its status from active to inactive and unstaffed with respect to the requirements to conduct routine facility inspections (Section 3.1.1), quarterly visual assessments (Section 3.2.3), benchmark monitoring (Section 6.2.1.3), and/or impaired waters monitoring (Section 6.2.4.2).

15.0 DOCUMENTATION TO SUPPORT ELIGIBILTY CONSIDERATIONS UNDER FEDERAL LAW

15.1 ENDANGERED AND THREATENED SPECIES AND CRITICAL HABITAIT PROTECTION

Coverage under MSGP is available only if stormwater discharges, allowable non-stormwater discharges, and stormwater discharge-related activities were the subject of an Endangered Species Act (ESA) consultation or an ESA section 10 permit, or if Facility stormwater discharges, allowable non-stormwater discharges, and stormwater discharge-related activities are not likely to adversely affect any species that are federally listed as endangered or threatened ("listed") and are not likely to adversely affect habitat that is designated as "critical habitat" under the ESA.

As outlined in Section E of the 2015 NOI e-Submittal and Section 1.1.4.5 of the MSGP, the Facility is eligible for coverage using Criterion C, which states "Federally listed threatened or endangered species or their designated critical habitat(s) are likely to occur in or near your Facility's "action area," and the industrial activity's discharges and discharge-related activities are not likely to adversely affect listed threatened or endangered species or critical habitat." A copy of the *Criterion C Eligibility Form*, which was provided to EPA on August 3, 2015.

15.2 HISTORIC PRESERVATION

As outlined in Section F of the 2015 NOI e-Submittal and Section 1.1.4.6 of the MSGP, the Facility is eligible for coverage using Criterion A, which states "stormwater discharges and allowable non-stormwater discharges do not have the potential to have an effect on historic properties and you are not constructing or installing new stormwater control measures on your site that cause subsurface disturbance."

16.0 EMPLOYEE TRAINING

The EHS Manger is responsible for coordinating the training of Facility personnel. To the extent practical, the training shall be conducted annually and may be combined with other environmental, health, or safety training. Please refer to the SPCC (Personnel Training for Discharge Preventions Procedures) and the BMP Plan (Employee Training) for specific training requirements under these documents. Copies of the training records are to be maintained in the personnel files at the Facility's Main Office.

At the beginning of each shift, shift leads will remind employees of good housekeeping practices and address any identified deficiencies at the Facility. At a minimum, the topics below shall be covered during SWPPP training sessions:

- The requirements of the MSGP;
- The purpose of the SWPPP and its content;
- The individual responsibilities of Facility personnel for complying with the requirements of the MSGP and goals and objectives of the SWPPP;
- The location of storm water drainage structures and receiving waters of the storm water system to emphasize the importance of keeping pollutants out of the SWCS;
- Potential pollutants that could directly impact adjacent properties or nearby water resources;

- Spill prevention and response procedures;
- Good housekeeping practices;
- Materials management;
- Proper handling and disposal of petroleum products and spent lubricants;
- Proper handling, usage, and disposal of process chemicals;
- Requirements for SWPPP Amendments and annual review process;
- The SWPPP Incident Chain of Command; and
- The SWPPP notification, reporting and recordkeeping requirements.

The EHS Manger is required to provide adequate training for newly hired employees, and to ensure that any changes in Facility personnel, staffing, and job responsibilities in the areas subject to the Facility SWPPP. Copies of trainings, certifications, and licenses shall be maintained in the Personnel files in the Main Office.

16.1 FACILITY SECURITY

The Facility relies on several layers of security including video surveillance cameras, Facility personnel, security lighting, and fencing. Additionally, the various automated systems are equipped with alarms and other telemetry devices to notify operators when key systems are down. These security systems are maintained under the BMP Plan across all Facility areas and are tested routinely. Copies of the testing documentation are maintained in the Main Office.

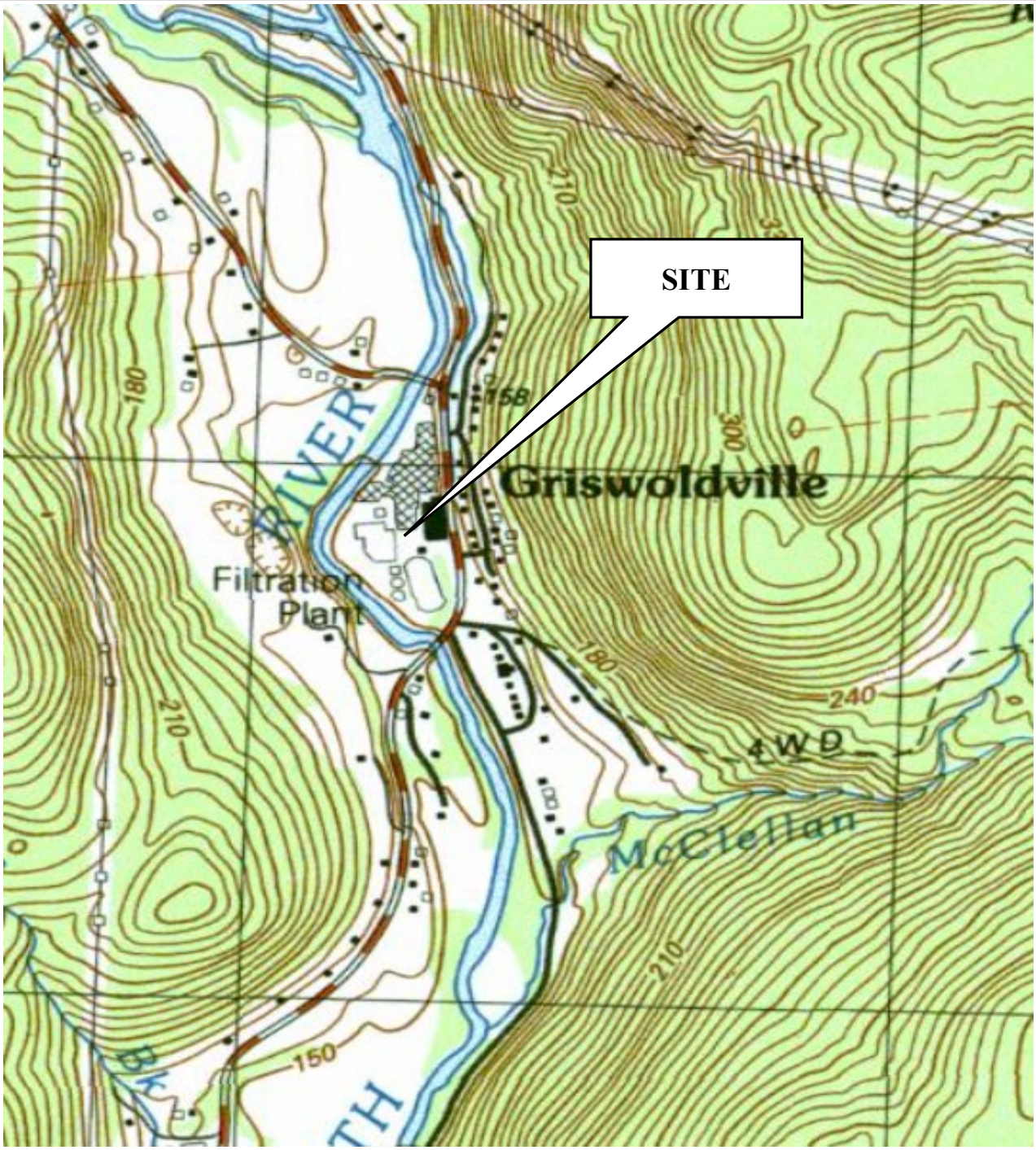
17.0 REFERENCES

United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector Permit For Stormwater Discharges Associated With Industrial Activity, 2015, USEPA Office of Water Enforcement and Permits, NPDES Technical Support Branch

Best Management Practices (BMP) Plan, Barnhardt Manufacturing Company, amended May 2020, 247 Main Road, Colrain, MA

Operation and Maintenance Manual, Barnhardt Manufacturing Company, May 2020, 247 Main Road, Colrain, MA

FIGURES



OMNI ENVIRONMENTAL GROUP

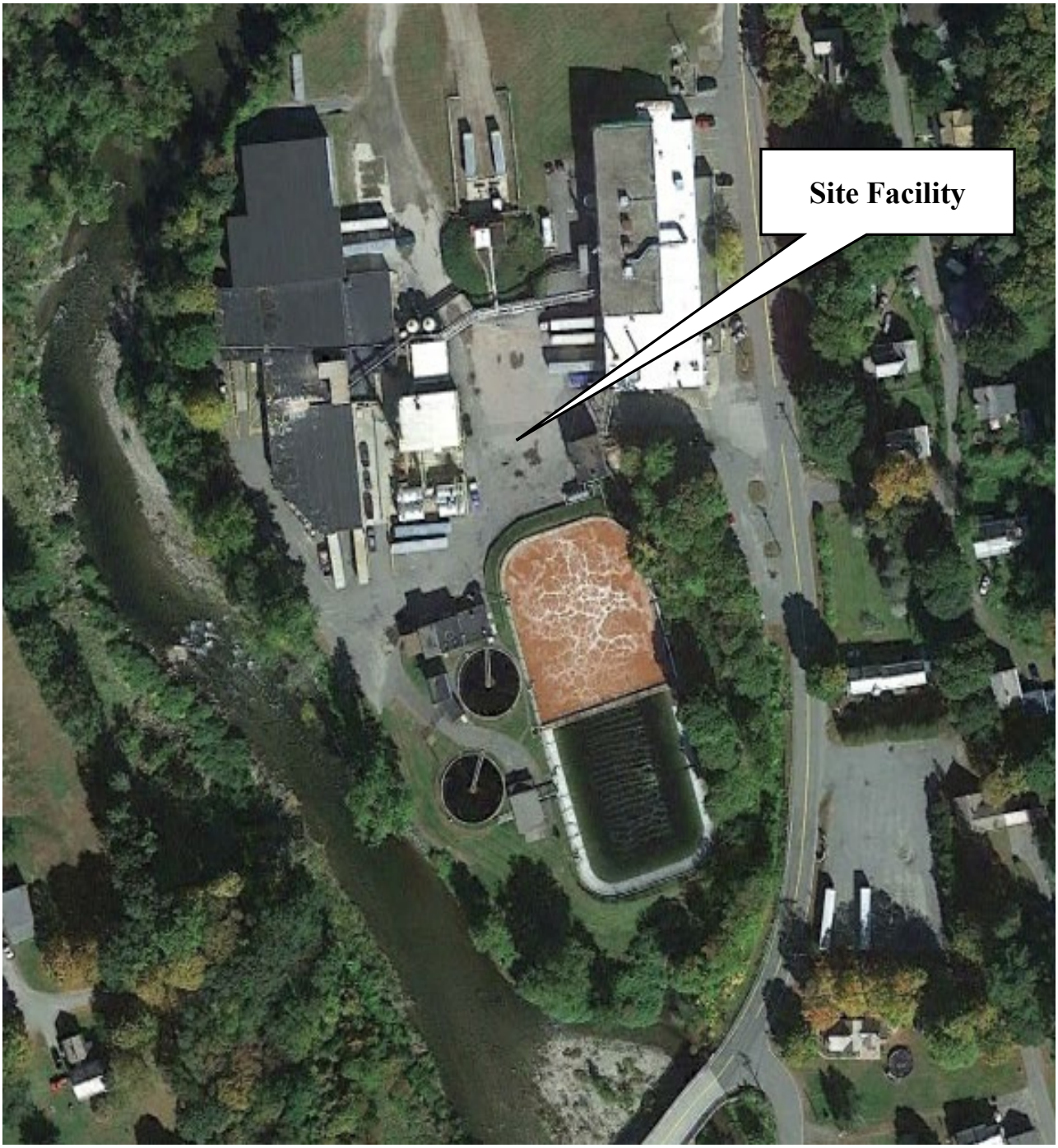
Barnhardt Manufacturing

247 Main Road

Colrain, Massachusetts

N

FIGURE 1 –LOCUS MAP



OMNI ENVIRONMENTAL GROUP

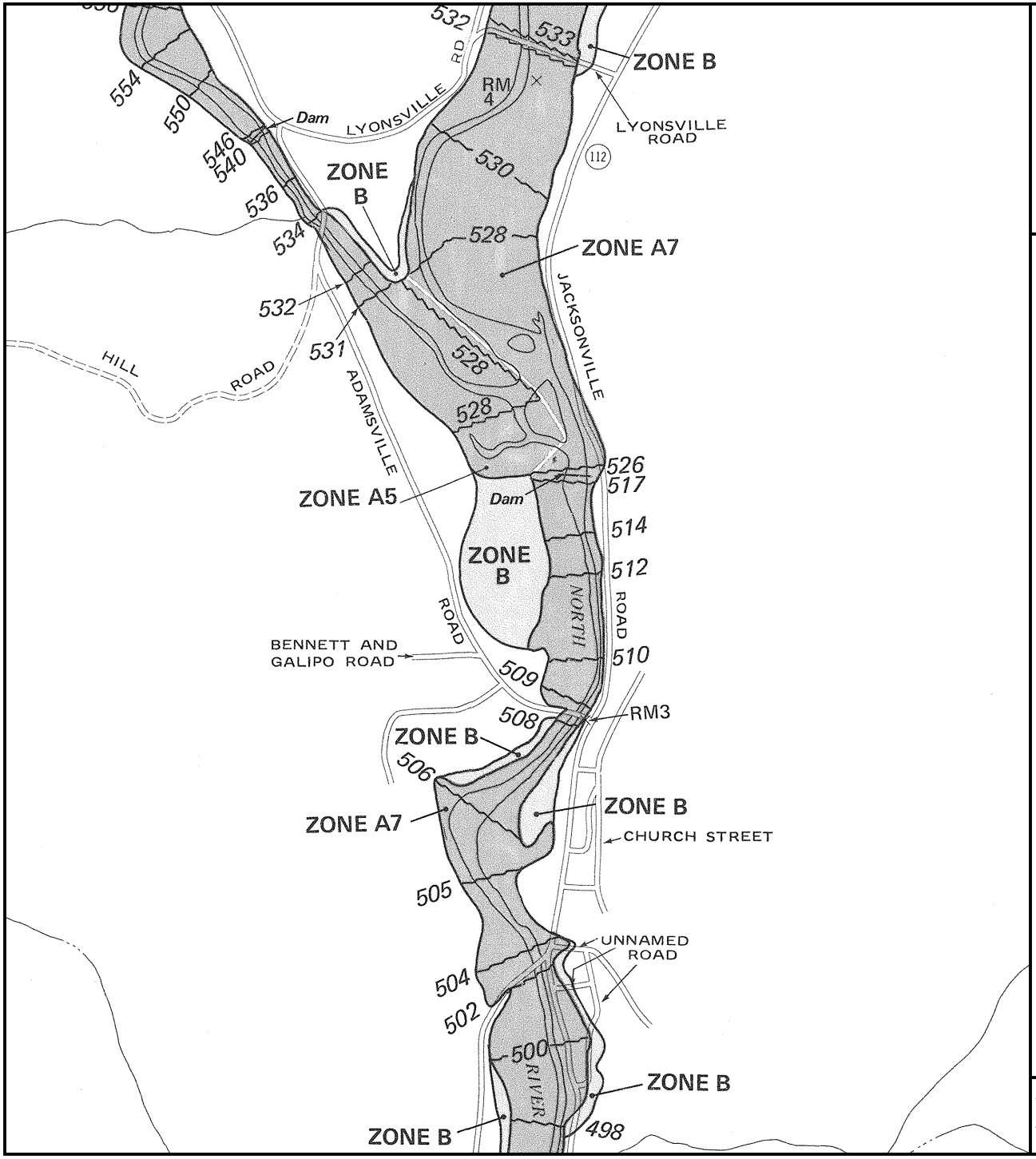
Barnhardt Manufacturing

247 Main Road

Colrain, Massachusetts

N

FIGURE 3 – AERIAL VIEW OF THE SUBJECT SITE



APPROXIMATE SCALE

1000 0 1000 FEET

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

TOWN OF
COLRAIN,
MASSACHUSETTS
FRANKLIN COUNTY

PANEL 10 OF 15

(SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER
250113 0010 B

EFFECTIVE DATE:
JULY 2, 1980

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
FEDERAL INSURANCE ADMINISTRATION

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

MassDEP - Bureau of Waste Site Cleanup

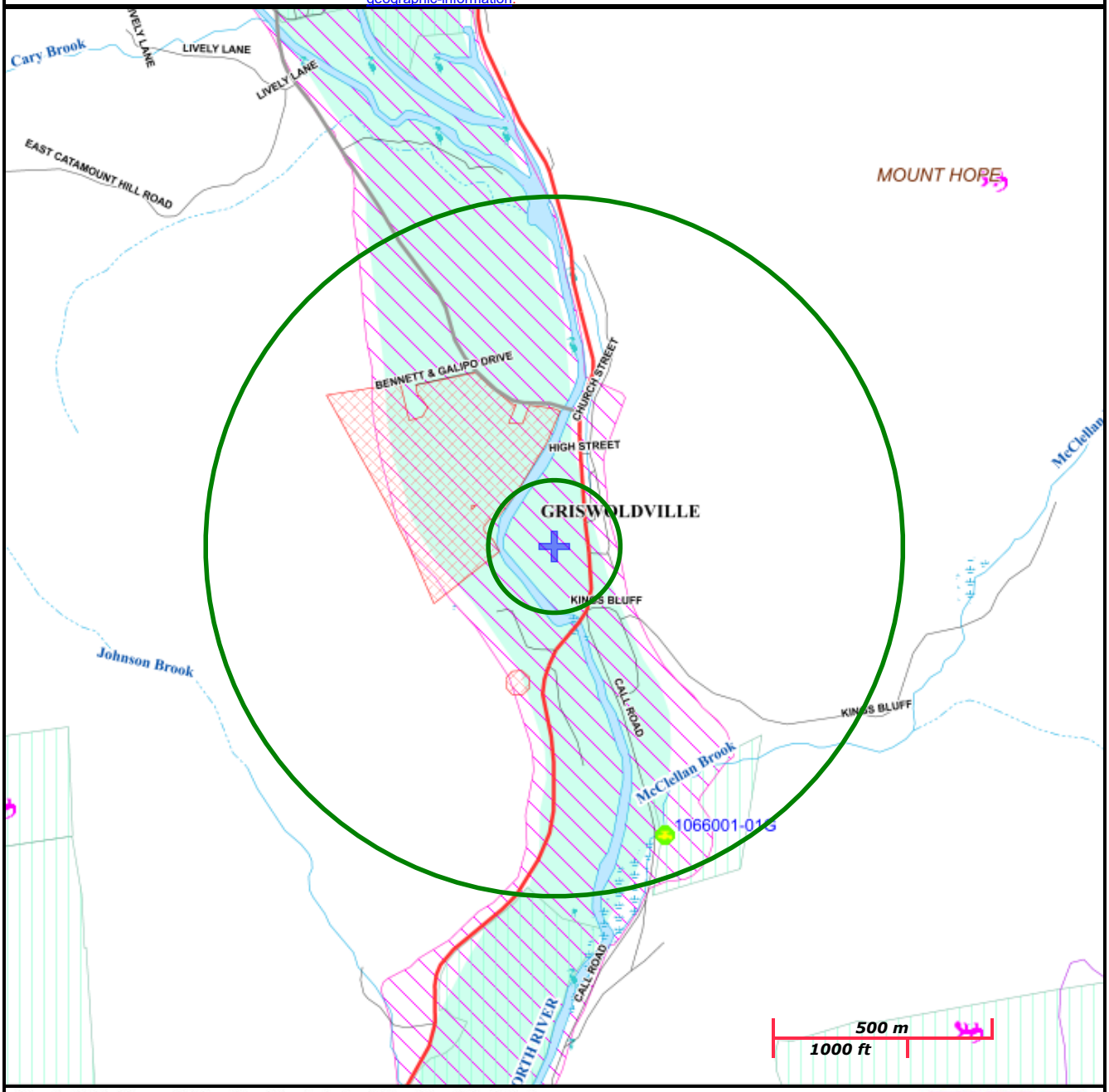
Phase 1 Site Assessment Map: 500 feet & 0.5 Mile Radii

Site Information:
FIGURE 4
247 MAIN ROAD COLRAIN, MA

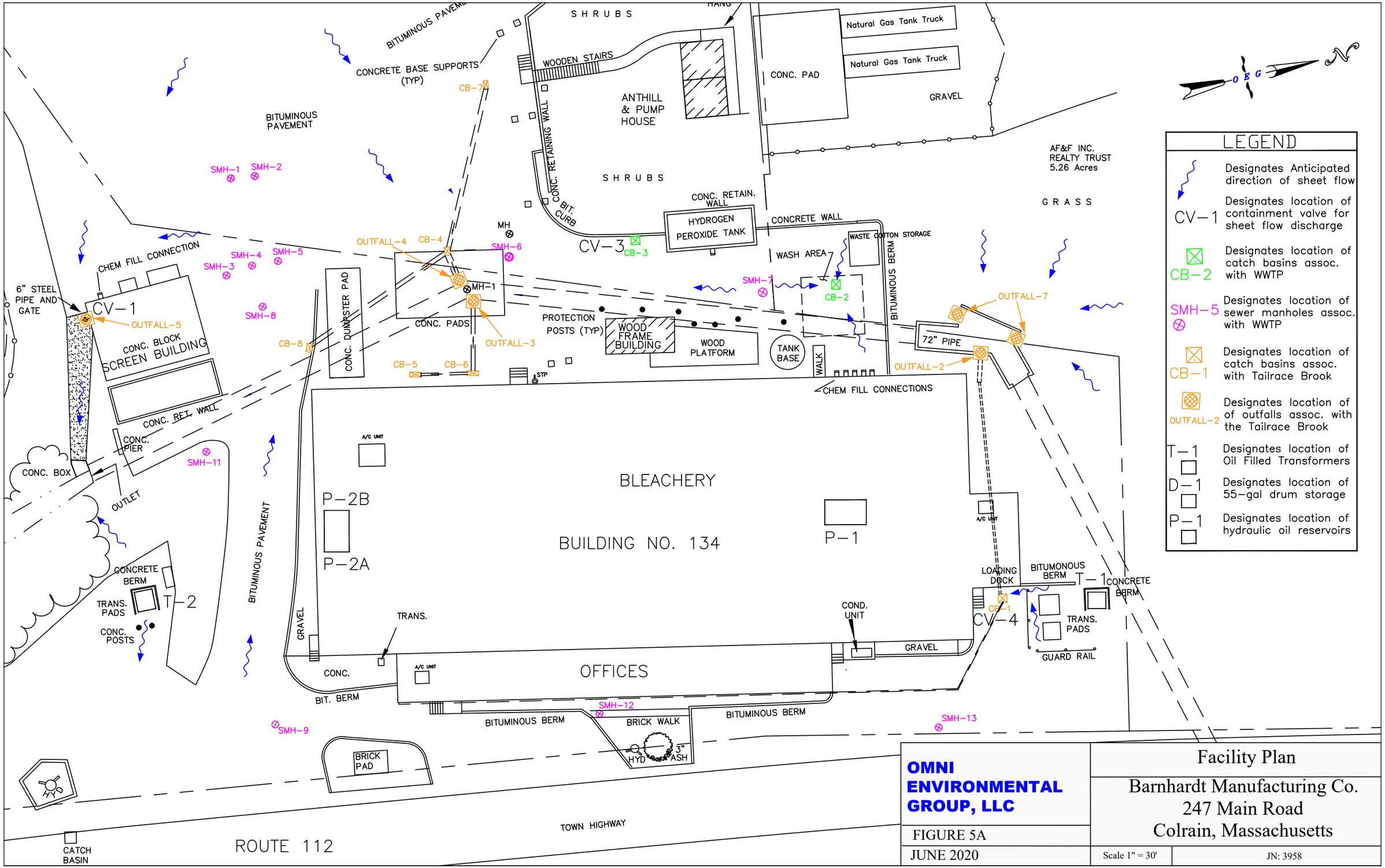
NAD83 UTM Meters:
4725073mN , 687265mE (Zone: 18)
June 10, 2020

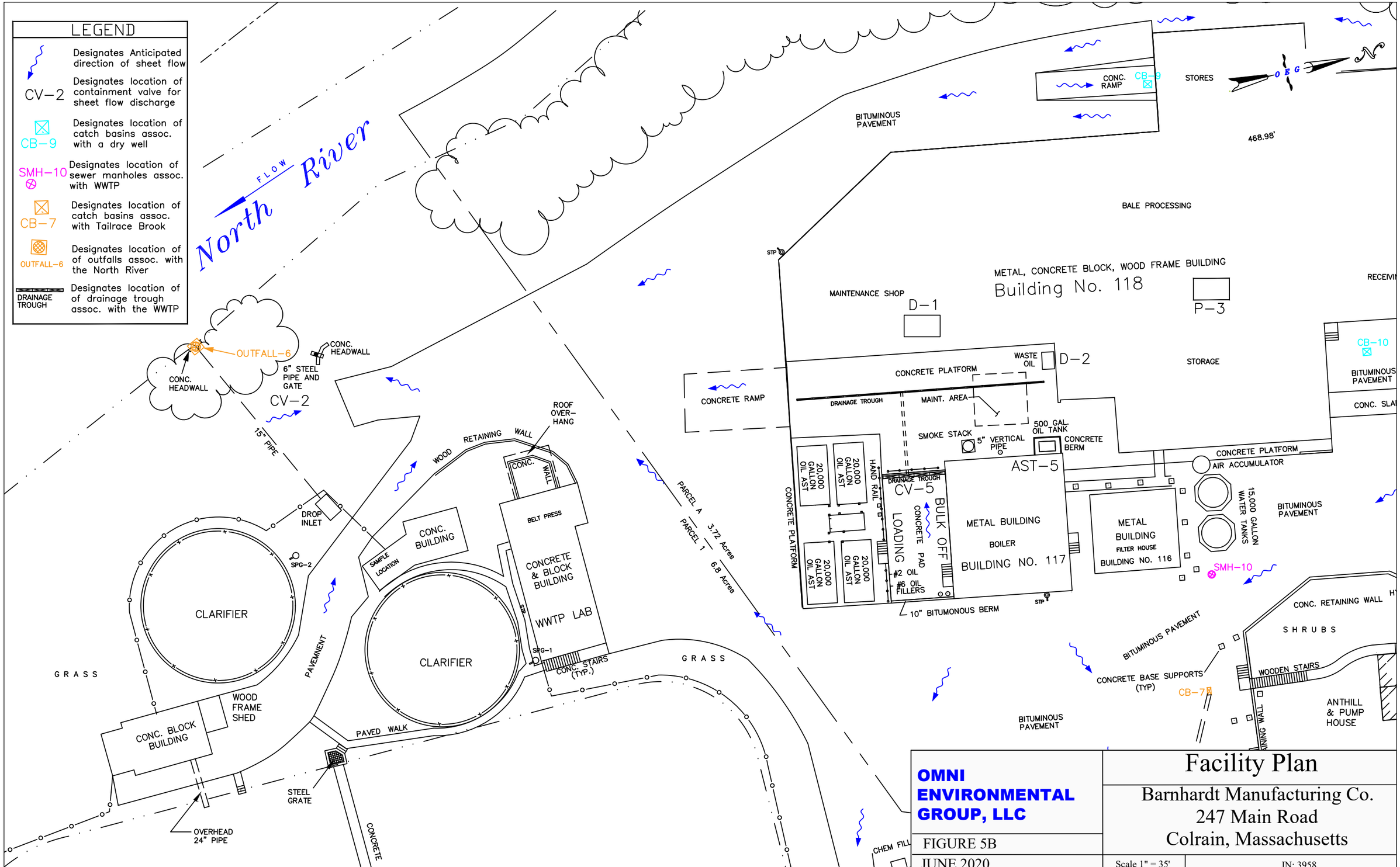
The information shown is the best available at the date of printing. However, it may be incomplete. The responsible party and LSP are ultimately responsible for ascertaining the true conditions surrounding the site. Metadata for data layers shown on this map can be found at: https://www.mass.gov/orgs/massgis-bureau-of-geographic-information.

MassDEP
Commonwealth of Massachusetts
Department of Environmental Protection



Roads: Limited Access, Divided, Other Hwy, Major Road, Minor Road, Track, Trail
Boundaries: Town, County, DEP Region; Train; Powerline; Pipeline; Aqueduct
Basins: Major, PWS; Streams: Perennial, Intermittent, Man Made Shore, Dam
Aquifers: Medium Yield, High Yield, EPA Sole Source
Non Potential Drinking Water Source Area: Medium, High (Yield)
PWS Protection Areas: Zone II, IWPA, Zone A
Hydrography: Open Water, PWS Reservoir, Tidal Flat
Wetlands: Freshwater, Saltwater, Cranberry Bog
FEMA 100yr Floodplain; Protected Open Space; ACEC
Est. Rare Wetland Wildlife Hab; Vernal Pool: Cert., Potential
Solid Waste Landfill; PWS: Com.GW,SW, Emerg., Non-Com.


BITUMINOUS PAVEMENT
CONCRETE BASE SUPPORTS (TYP)
CB-7
SHRUBS
WOODEN STAIRS
ANTHILL & PUMP HOUSE
CONC. RETAINING WALL
BIT. CURB
CONC. PAD
Natural Gas Tank Truck
Natural Gas Tank Truck
GRAVEL
AF&F INC. REALTY TRUST 5.26 Acres
GRASS
SMH-1
SMH-2
CONC. RETAIN. WALL
HYDROGEN PEROXIDE TANK
CONCRETE WALL
CV-3
CB-3
MH
SMH-6
OUTFALL-4
CB-4
WASTE COTTON STORAGE
WASH AREA
SMH-7
CB-2
BITUMINOUS BERM
OUTFALL-7
CHEM FILL CONNECTION
SMH-4
SMH-5
SMH-3
6" STEEL PIPE AND GATE
CV-1
OUTFALL-5
CONC. BLOCK SCREEN BUILDING
SMH-8
CB-8
CONC. DUMPSTER PAD
MH-1
CONC. PADS
OUTFALL-3
PROTECTION POSTS (TYP)
WOOD FRAME BUILDING
WOOD PLATFORM
TANK BASE
WALK
72" PIPE
OUTFALL-2
CB-5
CB-6
STP
CHEM FILL CONNECTIONS
CONC. RET. WALL
CONC. PIER
SMH-11
CONC. BOX
OUTLET
A/C UNIT
BLEACHERY
BUILDING NO. 134
P-2B
P-2A
P-1
BITUMINOUS PAVEMENT
CONCRETE BERM
TRANS. PADS
T-2
CONC. POSTS
GRAVEL
TRANS.
COND. UNIT
LOADING DOCK
BITUMONOUS BERM
T-1
CONCRETE BERM
CB-1
CV-4
TRANS. PADS
GUARD RAIL
CONC.
OFFICES
BIT. BERM
SMH-12
BITUMINOUS BERM
BRICK WALK
BITUMINOUS BERM
SMH-13
SMH-9
BRICK PAD
HYD
3" ASH
TOWN HIGHWAY
ROUTE 112
CATCH BASIN
LEGEND
Designates Anticipated direction of sheet flow
CV-1 Designates location of containment valve for sheet flow discharge
CB-2 Designates location of catch basins assoc. with WWTP
SMH-5 Designates location of sewer manholes assoc. with WWTP
CB-1 Designates location of catch basins assoc. with Tailrace Brook
OUTFALL-2 Designates location of of outfalls assoc. with the Tailrace Brook
T-1 Designates location of Oil Filled Transformers
D-1 Designates location of 55-gal drum storage
P-1 Designates location of hydraulic oil reservoirs
OMNI ENVIRONMENTAL GROUP, LLC
FIGURE 5A
JUNE 2020
Facility Plan
Barnhardt Manufacturing Co.
247 Main Road
Colrain, Massachusetts
Scale 1" = 30'
JN: 3958



OMNI ENVIRONMENTAL GROUP, LLC

FIGURE 5B

JUNE 2020

Facility Plan

Barnhardt Manufacturing Co.
247 Main Road
Colrain, Massachusetts

Scale 1" = 35'

JN: 3958

APPENDIX A
2015 NOTICE OF INTENT

Sharon Ziemek

From:	NeT@epa.gov
Sent:	Saturday, October 10, 2015 11:16 AM
To:	Sharon Ziemek
Cc:	lee.won@epa.gov; warner.suzanne@epa.gov; lescure.nasrin@epa.gov; berry.lauraj@epa.gov; emily@avanticorporation.com; farris.erika@epa.gov; Gray.davidj@epa.gov; Christiane@avanticorporation.com; bius.catherine@epa.gov
Subject:	EPA Multi-Sector General Permit (MSGP) Authorization is Active – BARNHARDT MANUFACTURING COMPANY, NPDES ID: MAR053530, NeT Submission ID: MSGP-490
Attachments:	AcceptedNewNOIReceipt.pdf

2015-10-10

Your Notice of Intent (NOI) requesting coverage for BARNHARDT MANUFACTURING COMPANY, 247 MAIN ROAD COLRAIN MA 01340 under EPA's Multi-Sector General Permit (MSGP) has been accepted and authorization to discharge under the MSGP became effective at the conclusion of your 30-day waiting period, on 2015-10-10.

For tracking purposes, the following NPDES ID has been assigned to your NOI: MAR053530. Attached to this email, you will find a copy of your completed NOI form. To access your NOI in NeT, please visit: https://cdx.epa.gov/epa_home.asp.

As you know, the MSGP requires you to have developed a Stormwater Pollution Prevention Plan (SWPPP) prior to submitting your NOI. The MSGP also includes specific requirements for implementing control measures (e.g., minimize exposure, good housekeeping, maintenance, spill prevention and response), conducting self-inspections and visual assessments of your discharges, taking corrective actions, and conducting staff training. You must comply with any specific requirements applicable to your industrial sector(s) in Part 8 and any state/tribal-specific requirements in Part 9 (see http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm). You are also required to submit an Annual Report in accordance with Part 7.5 of the MSGP that will contain the results from your past year's routine facility inspections, quarterly visual assessments, and corrective actions. Annual Reports must be submitted to EPA through NeT.

The MSGP includes five types of required analytical monitoring, one or more of which may apply to your discharge:

- Quarterly benchmark monitoring (see Part 6.2.1 and Part 8);
- Annual effluent limitations guidelines monitoring (see Part 6.2.2 and Part 8);
- State- or tribal-specific monitoring (see Part 6.2.3 and Part 9);
- Impaired waters monitoring (see Part 6.2.4); and
- Other monitoring as required by EPA (see Part 6.2.5).

Monitoring requirements in the MSGP (i.e., parameters required to be monitored and sample frequency) will be prepopulated on your electronic Discharge Monitoring Report (DMR) in EPA's NetDMR system, which is accessed at http://www.epa.gov/netdmr/. Where you have determined that no monitoring requirements apply to your discharge, there is no need to access the NetDMR system. In order to obtain access to this system, you must complete the electronic signature process. Please refer to the following guidance for information about submitting monitoring reports through NetDMR: http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-EPAs-MultiSector-General-Permit.cfm.

2015 NPDES Multi-Sector General Permit For Stormwater Discharges Associated With Industrial Activity (MSGP) Forms

United States Environmental Protection Agency
1200 Pennsylvania Ave, NW Washington, DC 20460

Note: This is a "smart form"; as you fill out the form, additional questions willl appear that you will need to answer.

Permit Information

1. What action would you like to take? *

File a New Notice of Intent Form

Submission of this Notice of Intent (NOI) constitutes notice that the operator identified in the Facility Operator Information section of this form requests authorization to discharge pursuant to the NPDES Stormwater Multi-Sector General Permit (MSGP) permit number identified in the Permit Information section of this form. Submission of this NOI also constitutes notice that the operator identified in the Facility Operator Information section of this form meets the eligibility conditions of Part 1.1 of the MSGP for the facility identified in the Facility Information section of this form. To obtain authorization, you must submit a complete and accurate NOI form. Discharges are not authorized if your NOI is incomplete or inaccurate or if you were never eligible for permit coverage.

Operator Name (Organization Name) *

BARNHARDT MANUFACTURING

Operator Name as Noted by the NOI Preparer

2. Select the state/territory where your facility is located *

Massachusetts

3. Is your facility located on Indian Country lands? *

○ Yes ◉ No

4. Are you requesting coverage as a "federal operator" as defined in Appendix A? *

○ Yes ◉ No

5. Are you a new discharger or a new source as defined in Appendix A? * ◯ Yes ◉ No

5a. Have stormwater discharges from your facility been covered previously under an NPDES permit? * ◯ Yes ◉ No

6. Do you directly discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding Natural Resource Water) (See Appendix L)? Your project will be considered to discharge to a Tier 3 water if the first water of the US to which you discharge is identified by a state, tribe, or EPA as a Tier 3 water. For discharges that enter a storm sewer system prior to discharge, the first water of the US to which you discharge is the waterbody that receives the stormwater discharge from the storm sewer system. * ◯ Yes ◉ No

7. Does your facility directly discharge to a Federal CERCLA site listed in Appendix P? For the purposes of this permit, a permittee discharges to a Federal CERCLA site if the discharge flows directly into the site through its own conveyance, or through a conveyance owned by others, such as a municipal separate storm sewer system. * ◯ Yes ◉ No

8. Has the Stormwater Pollution Prevention Plan (SWPPP) been prepared in advance of filing this NOI, as required? * ◉ Yes ◯ No

9. By indicating "Yes", I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges in Part 1.1.3. Any discharges not expressly authorized under the MSGP are not covered by the MSGP and they cannot become authorized by disclosure to EPA and/or a state via this Notice of Intent to be covered by the permit or by any other means (e.g., in the Stormwater Pollution Prevention Plan or during an inspection). If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit. * ◉ Yes ◯ No

10. Master Permit Number

MAR050000

A: Facility Operator Information

B: Facility Information

C: Discharge Information

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
002	+	42.656080	-	72.715025

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

North River

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

◯ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

◯ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
003	+	42.655591	-	72.715084

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

◯ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

North River

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

◯ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

◯ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
004	+	42.655591	-	72.715084

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

◯ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

North River

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
005	+	42.655227	-	72.715034

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

○ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

North River

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
006	+	42.654610	-	72.715809

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

◯ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

North River

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

◯ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

◯ Yes ◉ No

Outfalls

4. **List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.**

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
007	+	42.656101	-	72.715045

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

◯ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

◯ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

◯ Yes ◉ No

Provide the following information about your outfall latitude longitude.

5. Latitude/Longitude Data Source *

Map

6. Horizontal Reference Datum

WGS84

7. Does your facility discharge into a Municipal Separate Storm Sewer System (MS4)? *

○ Yes ◉ No

8. Do you discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) (See Appendix L)? *

○ Yes ◉ No

D: Stormwater Pollution Prevention Plan (SWPPP) Information

E: Endangered Species Protection

F: Historic Preservation

Certification Information

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 gather and evaluate 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. 40 CFR 122.22(d)

When you have completed this form, click this button to submit the form for processing. You will then be provided with further instructions should you have to provide supporting documentation.

To save a partially completed form for completion at a later date from a different computer, click the 'Save to NeT' button. Clicking this button will cause you to exit the form. You can then logon to NeT with your username and password at any time to complete this transaction.

APPENDIX B
2014 COMPREHENSIVE SITE INSPECTION

Comprehensive Site Evaluation - 2014

ID/Location	Collection Only (No Discharge)		Connected to:	Ultimate Destination	Potential Pollutants	Control Measures	Allowable Non-Stormwater Discharge
	Y	N					Identify
CATCH BASINS							
CB-1/North Loading Dock		X	N/A	Tailrace/North River (Outfall #2)	Chemical spill, Oil Filled Transformer leak (non-pcb), sand from paved surfaces	CB discharge valved - close when loading chemicals, spill kit in area, parking lot swept each spring	Uncontaminated Air Conditioner Condensate
CB-2/Waste Cotton Storage		X	SMH-7	Outfall #001 (NPDES controlled)	Cotton fiber with residual chemicals, chemical unloading spill, equipment washing, condensate from tank, ruptured tank	Cotton fiber stored in closed metal container to minimize exposure to SW, chemical unloading constantly monitored by driver. Peroxide tank has secondary containment, Overflow Rinse Tank is normal process water for WWTP so rupture directed to CB-2 is not an upset.	
CB-3/ Base of Anthill		X	SMH-6	Outfall #001 (NPDES controlled)	Chemical unloading spill, condensate from tank, ruptured tank, condensate from steam pipe drip leg	Chemical unloading constantly monitored by driver, Peroxide tank has secondary containment. Overflow Rinse Tank is normal process water for WWTP so rupture directed to CB-3 is not an upset. Discharge from CB has valve that can be closed to isolate spill if needed.	
CB-4 /Paved area west of Bldg 134 west loading docks		X	MH-1 (72" Culvert)	Tailrace/North River (Outfall #4)	Petroleum products from vehicular traffic, cotton fiber from building ventilators, sand from paved surfaces	Routine observations of paved lot by personnel traffic, screens over ventilators, parking lot swept each spring	
CB-5 & CB-6/Bldg 134 west loading docks		X	MH-1 (72" Culvert)	Tailrace/North River (Outfall #3)	Petroleum products from vehicular traffic, cotton fiber from building ventilators, sand from paved surfaces	Routine observations of paved lot by personnel traffic, screens over ventilators, parking lot swept each spring	
CB-7/South of anthill		X	CB-4	Tailrace/North River (Outfall #4)	Petroleum products from vehicular traffic, cotton fiber from building ventilators, sand from paved surfaces, condensate from process water tanks	Routine observations of paved lot by personnel traffic, screens over ventilators, parking lot swept each spring	Fire hydrant flushing
CB-8/ North side of sloped driveway		X	CB-4	Tailrace/North River (Outfall #4)	Petroleum products from vehicular traffic, cotton fiber from building ventilators, sand from paved surfaces	Routine observations of paved lot by personnel traffic, screens over ventilators, parking lot swept each spring	
CB-9/Stores loading dock	X		N/A				
CB-10/ Receiving Loading Bay #4	X		N/A				
TRENCH DRAINS							

Comprehensive Site Evaluation - 2014

ID/Location	Collection Only (No Discharge)		Connected to:	Ultimate Destination	Potential Pollutants	Control Measures	Allowable Non-Stormwater Discharge
	Y	N					Identify
TD-1/Oil unloading area		X	Boiler House drains	Outfall #001 (NPDES controlled)	Oil from unloading activity	Valve on discharge of trenches which is closed when unloading. Area is sloped toward drain, has concrete containment on three sides and a 10" high berm across entrance to provide containment in the event of a spill.	Uncontaminated Air Conditioner Condensate
TD-2/Paved area between Bldg 118 & 117		X	TD-1	Outfall #001 (NPDES controlled)	Petroleum products from vehicular traffic, diesel from unloading activities, oil from maintenance activites on leased equipment, oil from transfer to waste oil storage, condensate from steam dripleg	Uses TD-1 controls, plus routine observations of paved area by personnel traffic.	
VALVED DISCHARGE POINTS							
CV-1/Between Bldg 132 and Sufuric Acid Tank		X	N/A	Tailrace/North River (Outfall #5)	Chemical spill from unloading activity, petroleum products from vehicular traffic, sand from paved surfaces	Valve is closed in the event of an uncontrolled spill in the paved parking area, parking lot swept each spring	
CV-2/Head wall at river bank		X	N/A	North River (Outflall #6)	Petroleum products from vehicular traffic, sand from paved surfaces	Valve is closed in the event of an uncontrolled spill in the paved parking area, parking lot swept each spring	
ROOF DRAINS							
Office Roof Drains		X	CB-1	Tailrace/North River (Outfall #2)	cotton fiber from building ventilators	screens over ventilators	Uncontaminated Air Conditioner Condensate
Bleachery Roof Drains		X	Floor Drains	Outfall #001 (NPDES controlled)	cotton fiber from building ventilators	screens over ventilators	Uncontaminated Air Conditioner Condensate
Screen Building Roof Drains	X		N/A	Ground Infiltration	cotton fiber from building ventilators	screens over ventilators	
Anthill Pump House	X		N/A	Sloped Roof to Ground Infiltration	None	N/A	
XNG Building	X		N/A	Sloped Roof to Ground Infiltration	None	N/A	
WWTP Lab Solids Handling (Bldg #133)	X		N/A	Ground Infiltration	None	N/A	
WWTP Filter Building	X		N/A	Sloped Roof to Ground Infiltration	None	N/A	
WWTP Sample Building	X		N/A	Sloped Roof to Ground Infiltration	None	N/A	
WWTP Blower Building	X		N/A	Sloped Roof to Ground Infiltration	None	N/A	
Boiler Building Roof Drains (Bldg #117)		X	N/A	Sloped Roof to Tailrace/North River (Ou	None	N/A	
Filter Building Roof Drains (Bldg #116)		X	N/A	Sloped Roof to Tailrace/North River (Ou	None	N/A	
Warehouse Roof Drains (Bldg #119)	X		N/A	Sloped Roof to Ground Infiltration	None	N/A	
Maintenance Shop Roof Drains (Bldg #118)		X	N/A	North River (Outflall #11)	None	N/A	
Stores Roof Drains (Bldg #118)	X		N/A	Ground Infiltration	None	N/A	Uncontaminated Air Conditioner Condensate
TAF Roof Drains (Bldg #118)		X	N/A	Partially Ground Infiltration & Partially North River (Outfall #6)	None	N/A	

Comprehensive Site Evaluation - 2014

ID/Location	Collection Only (No Discharge)		Connected to:	Ultimate Destination	Potential Pollutants	Control Measures	Allowable Non-Stormwater Discharge
	Y	N					Identify
Eqipment Storage, Fire Protection & Compressor Area Roof Drains (Bldg #118)		X	CB-10 and CB-4	Partially CB#10 and Partially Tailrace/North River (Outfall #4)	None	N/A	
Miscellaneous							
Process Water Murdock Hydrant Runoff		X	N/A	SPG-1 & -2 Ground Infiltration SPG-3, -4 &-5 Ground Infiltration and/or Tailrace/North River	None	N/A	Untreated River Water for Routine structure washdown
Sprinkler Test Port Runoff		X	CB-4 or CV-2	MH-1 (Outfall #4) or Outfall #6	None	N/A	Equivalent to Fire hydrant flushing

Potential Prohibited Non-Stormwater Discharges & Corrective Action

None							

Dates Performed:

8/5/2014
8/6/2014
8/19/2014
8/22/2014
8/28/2014

Performed by: Sharon Ziemek

Signature

EHS Manager
Barnhardt Manufacturing Company

Note: Initial walkthrough to develop baseline table was performed during the week of 7/21/2014

APPENDIX C
SPCC PLAN

OIL SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

BARNHARDT MANUFACTURING COMPANY
247 MAIN ROAD
COLRAIN, MASSACHUSETTS

Prepared For:

Barnhardt Manufacturing Co.
247 Main Road
Colrain, Massachusetts 01340

Prepared By:

Omni Environmental Group LLC
6 Lancaster County Road
Harvard, Massachusetts 01541

Project No. 3958
AUGUST 2016

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OIL SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

BARNHARDT MANUFACTURING COMPANY
247 MAIN ROAD
COLRAIN, MASSACHUSETTS

1.0 INTRODUCTION

The following Spill Prevention, Control, and Countermeasures (SPCC) Plan was prepared on behalf of Barnhardt Manufacturing Company (herein referred to as BMC) for its facility located at 247 Main Road, Colrain, Massachusetts (the Site). This plan was prepared by Omni Environmental Group (OEG) of 6 Lancaster County Road, Harvard, Massachusetts and is designed to achieve compliance with Federal Regulation 40 CFR Part 112, and the Massachusetts Contingency Plan (MCP - 310 CMR 40.0000).

An SPCC Plan Amendment Log is provided in Appendix A. The SPCC Plan Inspection Forms for the facility are provided in Appendix B. The Applicability of Substantial Harm Criteria is provided in Appendix C. The Record of Annual Discharge Prevention Briefing and Training is provided in Appendix D.

A Locus Plan of the Site and surrounding area is provided as Figure 1. A Site Plan of the facility is provided as Figure 2. These plans display pertinent features including the location and contents of each fixed oil storage container, the footprint of the Site buildings, details related to the oil storage areas, sheet flow and local drainage system(s), and surface water bodies.

The major objectives of an SPCC Plan are to reduce the potential for spills and to improve the ability to handle such incidents should they occur. In order to encourage these skills, it is important that a copy of the plan be conspicuously posted at the Colrain main office and other pertinent locations of the facility where facility personnel may read and refer to it.

This SPCC Plan is a working document designed to be a tool BMC uses regularly to prevent or minimize spills. BMC is committed to providing the necessary resources to establish and maintain the SPCC Plan set forth herein.

1.1 Management Approval

The responsible party for management and implementation of this SPCC Plan is:

Tim Mosher
Environmental Health, Safety &
Manager
247 Main Road
Colrain, MA 01752
Tel: (413) 624-3471, ext. 3701

This SPCC Plan has been prepared in accordance with sound engineering practices and has the full approval of BMC management at a level of authority to commit the necessary resources to fully implement this SPCC Plan. This approval extends to the commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of petroleum-based substances which may be spilled on the BMC Colrain facility referenced herein and/or which may be discharged to navigable waterways. All levels of management and operating personnel are required to support the intent and procedures as set forth in this document.

_____ _____

Signature Print Name

_____ _____

Title Date

1.2 P.E. SPCC Plan Certification

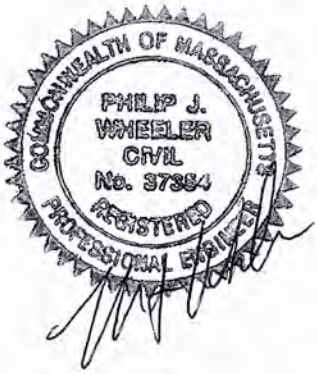
CERTIFICATION STATEMENT

I hereby certify that I have examined the subject facility and related information, and being familiar with the provisions of 40 CFR Part 112, attest that the following plans have been prepared in accordance with good engineering practice.

Philip J. Wheeler, P.E.

37354

Massachusetts Registration No.



8/29/16

Date

1.2.1 Amendments to SPCC Plan by Owners or Operators

Pursuant to 40 CFR Part 112.5, when there is a change in design, construction, operation or maintenance that materially effects a facilities potential for discharge as described in Part 112.1(b), the owner/operator of the facility shall amend the SPCC Plan in accordance with the general requirements of Part 112.7. An amendment under this section must be prepared within six (6) months and implemented as soon as possible, but no later than six (6) months following preparation of the amendment. Notwithstanding, a complete review and evaluation of the SPCC Plan must be conducted once every five (5) years from the date the facility becomes subject to SPCC rule. As a result of the review, a facility must amend its SPCC Plan within six (6) months of the review to include more effective oil prevention and control measures (if available) that significantly reduce the potential to incur a discharge at the facility. The facility must implement any such amendment as soon as possible, but no later than six (6) months following the preparation of the amendment.

Facilities must document the completion of the SPCC Plan review and evaluation, and must sign a statement as to whether the facility will amend the SPCC Plan. A Professional Engineer must certify any technical amendment(s) to the SPCC Plan in accordance with 40 CFR Part 112.3(d). The SPCC Plan Amendment Log is provided in Appendix A.

1.3 State Regulation

The Commonwealth of Massachusetts has no additional requirements specific to SPCC plans. Federal regulations are applied in Massachusetts. However, the MCP specifies response actions and reporting requirements related to oil releases to the environment. A sudden, continuous or intermittent release to the environment of any oil or hazardous material (OHM) in a quantity equal to or greater than the applicable Reportable Quantity (RQ) and where it is likely that the release occurred within any period of 24 consecutive hours or less must be reported to the Massachusetts Department of Environmental Protection (MassDEP) within two hours. The RQ for oils (i.e. gasoline, diesel fuel, #2 fuel oil, etc.) is 10 gallons. There are other reporting criteria

that would be applicable to other quantities and durations of oil releases, which are referenced under 310 CMR 40.0300.

1.4 Purpose

This SPCC Plan will provide a detailed description of BMC's Colrain Massachusetts facility, including the type(s) and volumes of oils located in these locations and will discuss the adequacy of spill prevention that is subject to SPCC rule and the recommended SPCC Plan amendment(s) (if any).

1.5 Recordkeeping

BMC will maintain the following SPCC-related records at the Main Office:

- Summaries of all training sessions;
- Oil storage area inspection forms;
- A record of any oil spills that occur at the facility, including documentation of telephone notification, copies of confirmation reports, and a complete description of cleanup and prevention activities; and
- A copy of the SPCC Plan, with any amendments.

In addition, a copy of the SPCC Plan should be maintained in the locations of oil storage referenced herein and subject to this SPCC Plan.

2.0 SUBPART A - CONSIDERATIONS UNDER 40 CFR 112.7

2.1 Facility Conformance with 40 CRF 112.7(a)(1) & (2)

BMC has taken all reasonable steps to comply with 40 CFR Part 112, as discussed herein this SPCC Plan.

2.2 Physical Layout of Facility - 40 CRF 112.7(a)(3) & (i)

The Site is located in a mixed industrial/residential area within the Town of Colrain (refer to Figure 1). The Site is abutted by vacant industrial land to the North (former AF&F facility), Main Road (i.e. Route 112) to the east, and the North River to the west and south. The Tailrace Brook runs from north to south in the eastern portion of the Site (Figure 2) and discharges into the North River immediately south of the Site. The facility is a manufacturing plant which utilizes petroleum in auxiliary equipment for steam and hydraulics for converting raw cotton into bales of clean, white absorbent cotton and contains multiple buildings and structures utilized for these manufacturing processes. The facility maintains a wastewater treatment plant (WWTP) as part of facility operations, which discharges to the North River under permit.

According to information provided by BMC, the oil-filled containers located at the Site (as shown on Figure 2) are as follows:

- Four (4) 20,000-gallon ultralow sulfur (ULS) #2 diesel ASTs located immediately south of Building 117, identified as AST-1 through AST-4;
- One (1) 500-gallon diesel AST located immediately west of Building 117, identified as AST-5;
- One (1) KVA non-Polychlorinated Biphenyl (PCB) filled transformer (~750 gallons) located north of Building 134, identified as T-1;
- One (1) KVA non-PCB filled transformer (~250 gallons) located south of Building 134, identified as T-2;
- One (1) cake maker pump hydraulic oil reservoir located within Building 134 (~100 gallons), identified as P-1;
- Interior 55-gallon drum storage for virgin motor and hydraulic oils located within Building 118, identified as D-1;
- Exterior 55-gallon drum storage for used oils located immediately east of Building 118, identified as D-2;

- Two (2) bailer hydraulic oil pump reservoirs located within Building 134 (~115 gallons per reservoir), identified as P-2A and P-2B; and
- One (1) waste bailer oil pump reservoir located within Building 118, identified as P-3.

Total storage volume is approximately 82,370 gallons

Access to the Site ASTs (AST-1 through AST-5) is limited to authorized Barnhardt personnel, authorized visitors and Barnhardt's fuel vendor(s). Access to the oil-filled electrical transformers (T-1 and T-2) located at the Site is restricted by steel enclosures and locked entries. Access to the hydraulic oil reservoirs associated with P-1, P-2A and P-2B is restricted to authorized personnel and by locked entry to Building 134. Access to interior 55-gallon drum storage area D-1 is restricted to authorized personnel and by locked entry to Building 118. Access to exterior 55-gallon drum storage area D-2 is restricted to authorized personnel and by locked entry on the storage container. The BMC facility is well light during dark hours.

Excluding T-1 and T-2, all of the aforementioned oil-filled containers are equipped with *Passive Secondary Containment*. *Active Secondary Containment* is available for all oil-filled containers at the facility.

The facility currently contains a liquefied petroleum gas (LPG) storage area located north of the Ant Hill Pump House (refer to Figure 2). LPG is a "natural gas" and EPA does not consider highly volatile liquids that volatilize on contact with air or water (i.e. LPG) to be oil (67 FR 47076). As such, the storage/use of LPG at this facility is not regulated under SPCC rule.

According to BMC, no additional oil-filled AST or UST are known to exist at the Site. However, additional non-oil containing AST and underground storage tanks (UST) associated with on-Site manufacturing process are present. The facility is not located in an area that would generally represent a potential ignition source for off-Site flammable/combustible materials.

2.2.1 BMC Bulk Storage Chart

Tank Type & Material	Volume (gallons)	Product Stored	Location	Comment	Bottom of Tank Visible?
Bulk ASTs Steel (4)	20,000	ULS #2 Diesel	Concrete AST Platform south of Building 117	Store no more than 40,000 gallons in 4 ASTs	Yes. ASTs on cradle supports.
55-gallon Drums Steel	55 to 220	Virgin oils	Building 119 Interior	Stores 0 to 4 drums as needed	No. Drums set on interior concrete floor
55-gallon Drums Steel	55 to 220	Waste oils	Building 119 Exterior waste oil container	Stores 0 to 4 drums as needed	No. Drums set on exterior container base.
Oil Filled Hydraulic Reservoirs	100 to 115	Hydraulic oils	Building 134 and Building 118	Auxiliary equipment containing hydraulic oil reservoirs and feed line	No. Reservoirs within equipment.
Electrical Transformers	250 to 750	MODF (non-PCB)	Northeast and south of Building 134	Oil filled electrical equipment	No. Transformers within enclosures set on concrete pads.
AST Steel	500	Diesel fuel	West of Building 117	Stores no more than 500 gallons in 1 AST	Yes. ASTs on cradle supports.

2.3 Discharge Prevention Measures - 40 CRF 112.7(a)(3)(ii)

Discharge prevention measures are those steps or procedures taken to minimize the potential for a discharge of oil during operations conducted at BMC's Colrain facility. This includes an evaluation of the following:

- Out-of-Service connections;
- Piping Support Designs;

- Aboveground tanks, valves and related appurtenance maintenance and inspections;
- Protection of aboveground tank systems from damage resulting from traffic; and
- The loading, unloading and transferring of oils at the facility.

Out-of-Service Connections

If a tank or oil storage container is taken Out-of-Service, it shall be capped, or blank-flanged at the transfer point, or otherwise sealed and labeled as "Out-of-Service" to prevent unwarranted use and/or a spill of oil. Presently, there are no such pipelines, tanks or oil storage containers with such designations at BMC's Colrain facility.

Piping Support Designs

The piping supports associated with the ASTs located at BMC's facility are designed to allow for expansion and contraction and to minimize corrosion and abrasion of the steel piping.

Aboveground tanks, valves and related appurtenance Inspections

Aboveground tanks, valves, piping and related appurtenances shall be inspected on a regular basis with particular attention paid to the conditions of (as applicable) pipes, flange joints, expansion joints, valve glands and bodies, catch pans, piping supports, valves, metal surfaces and areas of piping where leaks may occur. All aboveground piping should be marked for content (#2 fuel oil, hydraulic oil, etc.). Inspection Forms are provided in Appendix B.

Aboveground Piping Protection from Vehicular Traffic

All aboveground piping shall be protected from damage from vehicular traffic by way of barriers, bollards, clearance and warning signs, or verbal warnings upon entering a facility. The vast majority of the aboveground piping is located above the bulk ASTs, above the confines of the bulk loading area and within Buildings 117, 119 and 134. The oils contained within AST-1 through AST-5 are transferred to the appropriate portions of the facility via steel piping. The transfer piping is labeled and is located above ground and is supported by 17'6" high pipe and

conduit racking extending across the unloading area to Building 117 (i.e. boiler room). Due to the height and locations of the transfer piping, there is minimal opportunity for this piping to be damaged by vehicular or pedestrian traffic. The piping and supports are designed to minimize abrasion and corrosion and allow for expansion and contraction.

This piping is inspected monthly to determine the condition of joints, supports, valves and overall integrity of the piping. A monthly inspection checklist is provided in Appendix B.

Areas where above ground piping are located near vehicular traffic, protection from damage is provided by signage, barriers and warnings.

Loading, Unloading and Transfer of Oil at the Facility

As available, BMC personnel shall oversee vendor's bulk off-loading activities and shall ensure that the facility provides for general containment under SPCC Rule during bulk off-loading. All facilities shall comply with the minimum requirements set forth by the US Department of Transportation (DOT) for loading/off-loading activities, including:

- Smoking during off-loading or loading activities is strictly forbidden, including nearby persons whom may be smoking, lighting matches, carrying a flame, etc.;
- Prevent fire or ignition sources during off-loading or loading activities;
- The trucks hand brake shall be set while conducting off-loading or loading activities and all other reasonable precautions shall also be taken to prevent motion of the vehicle during the off-loading/loading action;
- A bulk tank shall be attended to by a qualified person during the off-loading/loading activity. A qualified person is considered to be "attending" to a bulk tank if he/she is alert, within a direct line of Site of the tank and transfer piping to the extent practical and within 25 feet of the tank.

- Unless the engine of the truck is utilized in the transfer of product, the engine shall be shut off while oil is being transferred to or from a truck.

Prior to conducting a bulk delivery, BMC shall notify the vendor(s) of the requested delivery, and BMC shall confirm the type and volume of oil(s) to be delivered to each tank, and visually confirm that the tank gauges indicate sufficient room for the delivery.

The four (4) bulk ASTs located south of Building 117 are equipped with top-mounted visual tank gauges (bobber and pulley), and vent pipes. The supply piping are complete with a ball valve/check valve/ball cap assemblies within the diked area that open/close distribution pipes for ULS #2 diesel supplies. Each bulk AST contains a gate valve at the union of the tank and supply piping to access or shut off a particular tank.

Each AST is complete with leak detection devices that monitor the annular space between the inner and outer wall of each tank, fill gauges and emergency vents. Prior to delivery, the volume of product in the tank is confirmed to ensure sufficient space for the off-loading. The off-loading operations at the facility are conducted via camlock connections within the containment area to prevent accidental releases.

Warning signs are present to prevent vehicles from departing prior to completely disconnecting the product transfer line(s). These signs shall instruct the attendant(s) loading of off-loading to examine all valves, hoses, connections, fittings and lower most drain outlets of the vehicle for signs of leakage prior to loading, off-loading, relocation and/or departure.

The 500-gallon ASTs located west of Building 117 is equipped with visual tank gauges and scully-type unifill connector. The ASTs is further equipped with audible alarm that whistles as the tank level approaches 90% capacity.

The diesel AST is used for providing fuel to facility machinery. Prior to delivery to the tank, the volume of product in the tank is confirmed to ensure sufficient space for the off-loading.

Spill Detection at the Facility

Any appreciable or sudden loss of oil from the inner and/or outer walls of AST-1 through AST-5 maintained at the Barnhardt facility will result in an alarm condition on the associated electronic tank monitoring systems and will lead to an investigation into the cause of the alarm condition and ultimately, the identification of the release. All of these oil filled ASTs are installed in a manner that provides for inspectors to identify any potential issues. Leaks that are generated from faulty flanges, piping or valves from the ASTs are anticipated to be discovered during daily operations, or during Barnhardt facility inspections. Facility inspections of the oil-filled ASTs/unloading area are conducted on a monthly basis (minimum).

Leaks that are generated from faulty flanges, drains or valves from D-1, D-2, P-1, P-2A/P-2B and P-3 are anticipated to be discovered during daily operations, or during BMC facility inspections, conducted on a monthly basis (minimum).

Any appreciable or sudden loss of oil from electrical transformers (T-1 and T-2) located at the Barnhardt facility will result in a disruption of electrical service to the facility and will lead to an investigation into the causation and ultimately, the identification of the release. T-1 and T-2 are the property of Western Massachusetts Electrical Company (WMECO).

Barnhardt installs and/or stores equipment in a manner that allows employees to readily identify potential issues. The above grade oil storage containers are readily visible and located in areas where employees work and/or frequently travel. During inspections, Barnhardt personnel are to note any discrepancies (i.e. tampered locks/gates or signs of vandalism), the actions taken (or to be taken) to correct such conditions and notify the appropriate Barnhardt personnel. The inspection checklist is provided in Appendix B. A separate checklist has been prepared for each

of the oil filled containers discussed herein. Barnhardt will retain the inspection records for 3 years, as part of the SPCC plan maintained at the Barnhardt main office (located within Building 134).

2.4 Discharge or Drainage Controls – 40 CFR 112.7(a)(3)(iii)

The Site is situated on the east bank of the North River. The vast majority of the Site is covered by the footprint of the Site buildings/structures and asphalt pavement. There is a gentle slope from northeast to southwest (in the direction of the North River) across the central and western portions of the Site. The eastern portion of the Site (including the access road) contains a moderate slope from northeast to southwest. Anticipated sheet flow across the facility is shown on Figure 2. Surrounding drainage within the facility consists of:

- Six (6) stormwater catch basins (CB-1 and CB-4 through CB-8) that discharge to the Tailrace;
- Two (2) stormwater catch basins (CB-2 and CB-3) that discharge to the on-Site WWTP;
- Two (2) stormwater catch basins (CB-9 and CB-10) that discharge to dry wells;
- Six (6) sewer manholes (SMH-1 through SMH-6) that discharge to the on-Site WWTP, which subsequently discharges to the North River;
- Two (2) drainage troughs within oil unloading area and west of Building 117 that discharges to the WWTP, which subsequently discharges to the North River; and
- Two (2) containment valves (CV-1 and CV-2) that control the discharge of facility sheet flow not draining to the aforementioned catch basins to the Tailrace Brook (CV-1) or North River (CV-2).

Additional drainage features at the facility include a floor drain in Building 134 northwest of P-1 that discharge to the on Site WWTP. Additional drainage features abutting the facility include storm water catch basins along Main Road that discharge to the North River or Tailrace.

Pursuant to 40 CFR part 112.8(2), facilities in which drainage of diked areas (either in part or whole) discharge directly into a watercourse, the facility must inspect and drain the uncontaminated water in accordance with 40 CFR part 112.8(c)(3)(ii) and (iii). This includes: 1) inspecting the retained water to ensure that its presence will not cause a discharge of oil to navigable waters; and 2) open the bypass valves and reseal them following drainage under responsible supervision. As discussed, the drainage grate within the unloading area and drainage trough adjacent to the 500-gallon AST and exterior waste oil storage area is normally closed and discharges to the on-Site WWTP.

Pursuant to 40 CFR part 112.8(3), facility drainage from non-diked areas in which there is a potential for a discharge of oil must be designed to retain oil within the facility and prevent impacts to navigable waters. To comply with this part, BMC maintains two (2) stormwater control valves (CV-1 and CV-2) that can be closed and drain mat blockers that can be deployed over catch basins in the event of a release of oil from a non-diked area of the facility. The approximate location of these structures and the anticipated directions of sheet flow across the Site (leading to one or more of the aforementioned Site drainage structures) are also shown on Figure 2.

The nearest surface water bodies are: 1) the Tailrace Brook located in the eastern extent of the Site; and 2) the North River which abuts the western extent of the Site (both flowing north to south). The on-Site facility drainage, WWTP effluent and the Tailrace Brook discharge to the North River. Therefore, there is a potential for spills to directly enter navigable waters at the facility.

2.4.1 BMC Bulk ASTs

Four (4) double-walled AST systems, designated by locations AST-1 through AST-4 on Figure 2 are used to store ULS #2 diesel. These tanks, manufactured by Beta Tank, Inc., are situated on steel saddles on an elevated concrete base immediately south of the petroleum unloading area.

These AST systems are equipped with interstitial leak detection and an emergency vents and fill gauges.

One (1) double-walled AST system, designated by location AST-5 on Figure 2 is used to store diesel fuel. This tank, manufactured by Beta Tank, Inc., is situated on steel saddles on a concrete base immediately west of Building 117. This AST system is equipped with interstitial leak detection and an emergency vent and fill gauge.

Leak detection sensors are activated if the fluid, either water or oil, enter the space between the inner and outer wall of the tank. The fuel oil pumps are situated in Building 117. The double-walled construction of the tanks and interstitial leak detection systems are considered passive secondary containment measures.

The outer wall of each of these ASTs is considered *Passive Secondary Containment* systems. There are no catch basins located in the immediate vicinity of these ASTs and discharge into the aforementioned drainage trough (discharge valve normally closed) leads to the on-Site WWTP.

Spill kits containing sorbent materials (granular absorbents, pads, booms, etc.) are maintained by BMC at the facility in sufficient quantities for use as *Active Secondary Containment*.

2.4.2 BMC Interior Virgin Oil Storage

Up to four (4) 55-gallon drums of hydraulic oil and motor oil are stored in Building 118, designated by location "D-1" on Figure 2. These drums are stored on a spill pallet on the concrete slab floor in the southern portion of Building 118. The floor slab of Building 118 is flat with no discernable pitch in the vicinity of D-1.

In addition, spill response gear is stored in close proximity to D-1. No floor drains are noted within Building 118 in the vicinity of D-1.

The spill pallet, competent poured concrete floor slab (and lack of interior drainage features) of Building 118 in the vicinity of D-1 is considered a *Passive Secondary Containment* system.

Spill kits containing sorbent materials (granular absorbents, pads, booms, etc.) are maintained by BMC at the facility in sufficient quantities for use as *Active Secondary Containment*.

2.4.3 BMC Exterior Used Oil Storage

Up to four (4) 55-gallon drums of used motor oil/hydraulic oil are on a spill pallet stored in a locked enclosure immediately east of Building 118, designated by location "D-2" on Figure 2. This enclosure is situated on a concrete pad and contains a base spill pallet. The concrete pad east of Building 118 is predominantly flat with a slight pitch towards the south. As stated, spill response gear is stored in within Building 118 and in close proximity to D-2. The drainage trough located south of D-2 leads to the on-Site WWTP.

The spill pallets, storage container, competent exterior poured concrete platform (and lack of uncontrolled drainage features) of Building 118 in the vicinity of D-2 is considered a *Passive Secondary Containment* system.

Spill kits containing sorbent materials (granular absorbents, pads, booms, etc.) are maintained by BMC at the facility in sufficient quantities for use as *Active Secondary Containment*.

2.4.4 Hydraulic Oil Pump Reservoirs

Two (2) separate 100-gallon and two (2) adjacent 115-galllon hydraulic oil reservoirs associated with BMC auxiliary equipment are located in the northern (P-1) and southern (P-2A/P-2B) portions of Building 134 (lower level) and in the east-central portion of Building 118 (P-3),

designated by locations P-1, P-2A/P-2B and P-3 on Figure 2. The hydraulic oil reservoirs for P1 and P-2A/P-2B are located within two concrete containment structures that reside on the concrete floor slab of Building 134 (one containment structure for P-1 and one containment structure for P-2A/P-2B, respectively). There is no containment structure for P-3. Due to the nature of the hydraulic oil utilized in these auxiliary equipment, there is only minimal handling/transferring of the oils. Spill response gear is stored in nearby in Buildings 117 and 118 for use as needed at these locations. A floor drain is located northwest of P-1 which discharges to the WWTP. No drainage structures are noted in the vicinity of P-2A/P-2B or P-3.

The concrete containment structures housing P-1 and P-2A/P-2B within the lower level floor of Building 134 are considered *Passive Secondary Containment* systems. For P-3 the concrete floor and lack of floor drains in Building 118 are considered *Passive Secondary Containment*.

Spill kits containing sorbent materials (granular absorbents, pads, booms, etc.) are maintained by BMC at the facility in sufficient quantities for use as *Active Secondary Containment*.

2.4.5 Oil-Filled Electrical Equipment

Two (2) electrical transformers are located on the Barnhardt property and provide electrical service to their facility, designated by location T-1 and T-2 on Figure 2. The electrical transformers are the property of WMECO, constructed as two separate aboveground units. T-1 is a 2,000 KVA transformer containing approximately 750 gallons of non-PCB transformer oil located north of Building 134. T-2 is a 500 KVA transformer containing approximately 250 gallons of non-PCB transformer oil located south of Building 134. Each transformer is contained within a locked steel enclosure set upon a concrete pad containing a “U” shaped concrete curbing along the southern, western and northern extents of the pads, further surrounded by asphalt. The transformer oil is utilized in the operation of the transformer and there is no handling/transferring of the transformer oil by Barnhardt personnel.

Any repairs or modifications to T-1/T-2 are performed by WMECO personnel. Spill response gear is stored in nearby in Buildings 117/118 and the unloading area for use as needed at T-1 and/or T-2.

There appeared to be some minor cracking/spalling to the U shaped concrete containment curbing associated with T-1, as observed in August 2016. OEG recommends that the integrity of these concrete containments be evaluated by appropriate BMC and/or WEMCO personnel and upgraded or repaired by appropriate personnel as necessary to maintain the desired function.

The U shaped concrete curbing surrounding T-1 and T-2 are considered *Passive Secondary Containment* systems.

Spill kits containing sorbent materials (granular absorbents, pads, booms, etc.) are maintained by BMC at the facility in sufficient quantities for use as *Active Secondary Containment*.

2.4.6 Vendor Off-Loading to Bulk ASTs

BMC's vendor bulk off-loading area is a concrete structure containing an approximate 1% slope (east to west) located between the elevated concrete pad for AST-1 through AST-4 and the footprint of Building 117, within the central portion of the Site (refer to Figure 2). The unloading area contains an approximate 10-inch asphalt berm at the eastern (high) end and a valve operated drainage trough at the western (low) end of the structure which discharges to the WWTP. This drain is normally closed during Barnhardt operations and the unloading area has the capacity to contain approximately 4,900 gallons. This retention capacity further provides for sufficient free board for precipitation in the dike.

As available, BMC personnel shall oversee vendor's bulk off-loading activities and shall ensure that the facility provides for general containment under SPCC Rule during bulk off-loading. Prior to conducting a bulk delivery, BMC shall notify the vendor(s) of the requested delivery, and

BMC shall confirm the type and volume of oil(s) to be delivered to each tank, and visually confirm that the tank gauges indicate sufficient room for the delivery.

The adequately sized concrete containment used for vendor bulk off-loading to AST-1 through AST-4 is considered a *Passive Secondary Containment* system.

Spill kits containing sorbent materials (granular absorbents, pads, booms, etc.) are maintained by BMC at the facility in sufficient quantities for use as *Active Secondary Containment*.

2.5 Countermeasures for Discharge Discovery, Response & Cleanup – 40 CFR 112.7(a)(3)(iv)

If a spill occurs, BMC employee efforts should be focused on: 1) attempting to cease the discharge by way of closing valves, turning off pumps, or isolating a line leak; and/or 2) employing containment/diversionary tactics through the use of spill kit items or similar materials to minimize migration of the oil and prohibit a release to navigable waters (by way of overland migration and/or stormwater conveyance systems, as applicable), until a qualified emergency response contractor arrives to address the source of the release. These defensive measures should be performed only by qualified personnel, familiar with this SPCC Plan and trained at a First Responder Awareness Level under the OSHA regulations (29 CFR Part 1910.120).

BMC personnel shall be trained on response to spills of less than 10 gallons at the facility and how to employ sorbent materials to contain and subsequently properly dispose of the oils released. See 2.7.2 [detailing 40 CFR 112.7(a)(5)] for procedures to follow in the event of a release.

For a release of 10 gallons of oil or greater, refer to the below for applicable Massachusetts reporting requirements to the MassDEP under the MCP.

Incidental Spills

An incidental spill has *all* of the following characteristics:

- The spill is less than 10 gallons;
- The spill can entirely be cleaned up within the capabilities of BMC personnel; and
- The spill or cleanup operation does not pose a safety risk.

The first person to detect an oil spill is responsible for immediately notifying the Spill Response Coordinator of the situation.

Incidental spills require internal notifications. Inform the Spill Response Coordinator of the spill situation, including location and quantity spilled, and any relevant or requested information that you know.

Only if safe to do so, trained personnel should stop an oil leak by such means as:

- Closing valve;
- Plugging opening;
- Righting knocked-over container; and
- Lifting dropped hose.

Only if safe to do so, trained personnel should contain an oil leak by such means as:

- Using spill kit materials and/or containment/diversionary tactics to stop movement of oil to the extent possible; and
- Using other available materials and equipment only if spill materials are not available.

Trained personnel should clean up the spilled material using absorbents and/or the spill kit provided in the vicinity. Dispose of all spill clean-up materials appropriately (i.e. in a properly labeled and secured 55-gallon drum). Personnel not involved in the spill response activities must be kept away from the spill area. If possible, cordon off the spill area to prevent unintended access.

Large Spills

If a spill is not an incidental spill, it is a large spill.

The initial notification requirements for a large spill are the same as for an incidental spill: immediately report the incident to the Spill Response Coordinator.

It is important to communicate the size and location of the spill to the Spill Response Coordinator so that it can be determined if it is a large spill or an incidental spill. If the spill requires response by an ambulance or the fire department, make sure to inform the Spill Response Coordinator. The Spill Response Coordinator will notify:

- Local Police and/or Fire Department, and ambulance services, if/as required;
- BMC's Emergency Response Contractor and Licensed Site Professional (LSP);
- Appropriate BMC Staff; and
- Appropriate regulatory agencies (refer to Section 2.7).

The Spill Response Coordinator will inform the necessary parties of the spill situation and of all relevant information available (refer to Section 2.7.1).

If/as appropriate, evacuate the area in accordance with established BMC procedures. In the event of a large spill (a release greater than 10 gallons), the BMC Spill Response Coordinator will request assistance from an emergency response contractor to provide spill containment, clean-up,

and disposal services. The current BMC contract for emergency services is provided in Section 2.7.

2.6 Methods of Disposal for Recovered Materials – 40 CFR 112.7(a)(3)(iv)

Residuals (i.e. oil, oil-contaminated soil, water and oil, sorbent materials, vegetation, etc.) from oil spill cleanup of a reportable release, constitute remediation waste under the MCP. Spill residuals are to be stored, managed, and disposed of in accordance with the guidelines set by federal, state and local ordinances. If the discharge is contained by facility personnel, the recovered materials will be stored in suitable drums.

The material shall then be disposed of at an appropriately licensed facility. If the discharge required the use of a remedial contractor, then the contractor shall arrange for the appropriate management and off-Site disposal of the recovered materials.

The MCP requires that the removal and disposal of remediation waste must be managed under a Bill-of-Lading (BOL). In addition, wastes should be evaluated to determine whether a uniform hazardous waste manifest is required due the presence of characteristic or listed hazardous wastes.

Uncontainerized remediation waste may be stored at the Site for up to 120 days, provided it is stored in a secure manner to prevent exposure to humans and the environment. The remediation waste should, where practicable, not be stockpiled or consolidated near sensitive human health receptors such a public or private water supply wells or sensitive environmental receptors such as wetlands, surface water bodies, or marine environments.

The remediation waste must be placed entirely on a base composed of an impermeable material, and shall be immediately covered with the same material or other suitable material so as to minimize the infiltration of precipitation, volatilization of contaminants, and erosion of the

stockpile. Any cover material used shall be properly secured and possess the necessary physical strength to resist tearing by the wind. Any failure of the materials or procedures used in employing the base layer or cover layer shall be immediately repaired, replaced, or re-secured so as to minimize precipitation infiltration, volatilization, and erosion/runoff of the remediation waste.

Oil spill cleanup debris shall be removed from the Site only in secured drums or canisters or in a vehicle which is covered. If oil spill debris is generated as a result of a release, it must be managed under a BOL or Hazardous Waste Manifest and removed from the Site within 90 (hazardous materials) to 120 days (BOL materials).

Oil spill cleanup debris shall be removed only to one of the following facilities: Massachusetts Landfills per MassDEP Policy No. COMM-97-001, asphalt batching facilities or other facilities, approved by the MassDEP to accept oil spill debris under MassDEP Policy WSC-94-400, or any out of state facility that will agree to take material and that is permitted/licensed to accept that material by the state in which it is located.

Within 30 days of off-Site transport, the owner/operator shall submit to MassDEP the waste documentation specifying date of removal and location of the receiving facility.

2.7 Emergency Contact List and Telephone Numbers – 40 CFR 112.7(a)(3)(vi)

Owner/Operator of Facility:	BMC - 247 Main Road, Colrain, MA 01340 Tel: (413) 624-3471 Boiler Room Ext. 3703
SPCC and Spill Response Coordinator: Primary Contact:	Mark Thibodeau Maintenance Manager Tel: (413) 624-3471 Ext. 3720 Tel: (413) 624-3232 (off hrs.)
Secondary Contact/Health Safety and Environmental Compliance Manager:	Tim Mosher Environmental, Health & Safety Manager Tel: (413) 624-3471 Ext. 3701 Cell: (413) 768-0812 (off hrs.)
Emergency Response Contractor:	Western Massachusetts Environmental 93 Wayside Avenue W Springfield, MA 01089 Tel: (413) 788-2622
LSP/Environmental Consultant:	Omni Environmental Group 6 Lancaster County Road Harvard, MA 01451 Tel: (978) 256-6766
Fire Department/Police Department/Ambulance	911
U.S. Coast Guard Disaster Response Command	(617) 223-8515
National Response Center (NRC)	(800) 424-8802
MassDEP (Emergency)	(888) 304-1133

2.7.1 Information to be given to Contacts – 40 CFR 112.7(a)(4)

In the event of a spill of oil at the BMC Colrain facility, the following information should be recorded by the person(s) observing the incident and related, as needed, to federal, state and local authorities:

1. Address/location and/or phone number of the facility;
2. Date and time of the discharge or discovery of the discharge;
3. An estimate of the total quantity of oil released;
4. Source of the discharge;
5. A description of all impacted media resulting from the discharge;
6. Cause of the discharge (if known);
7. Damages or injuries caused by the discharge;
8. Actions being taken to stop, remove and mitigate the effects of the discharge;
9. Whether evacuation may be required; and
10. Names of the individuals/organizations that have also been notified.

2.7.2 Procedures to Follow in the Event of a Discharge – 40 CFR 112.7(a)(5)

BMC Notification

In the event of a release of oil, the following procedures shall be taken by the person observing the incident: Notify the Primary SPCC/Spill Response Coordinator and/or Secondary SPCC/Spill Response Coordinator immediately in person or at the contact information presented above. Additional contact numbers are provided during off-hours.

If a release of oil is identified, the primary or secondary SPCC/Spill Response Coordinator will contact the designated response contractor to initiate cleanup activities, and will determine if the release fits the regulatory definition of a discharge, or a quantity of oil reaches a navigable waterway. The primary or secondary SPCC/Spill Response Coordinator, or an authorized designee thereof, will contact the appropriate authorities as described below.

Oil Spill Procedure

In the event of a spill of oil at the BMC Colrain facility, the following procedures shall be conducted:

1. Take prompt necessary measures to stop the release of oil, if it is safe to do so, by such actions as closing a valve, turning off a pump, righting an overturned container or isolating a leaking line or hose.
2. Immediately initiate the Contact Reporting Procedures listed in this Section.
3. Identify the type, source and location of the release, the approximate volume of oil released and area(s) impacted.
4. Evaluate the potential for ancillary hazards such as a fire or risk to employees or public safety concerns at or abutting the facility and notify the appropriate officials (local Fire Department, Police and/or emergency ambulance services).
5. BMC shall notify the Emergency Response Contractor if the release is not contained on-Site, and/or cannot be addressed by BMC's employees through the use of Active Secondary Containment Measures (i.e. through the use of Spill Kits).
6. Take prompt action to contain the release to the immediate vicinity of the leak Site, or to the Site property by way of diversionary tactics, temporary dams/berms and/or the use of sorbent materials. Such actions should only be performed by BMC personnel trained on response to spills of less than 10 gallons and how to employ sorbent materials to contain the oils released, and DOES NOT PRESENT ADDITIONAL RISK TO PERSONAL SAFETY.
    a. Contain a release of oil through the use of booms, absorbents, or other suitable materials from spill kits to be maintained at the facility. The spill kits should only be used by individuals who are trained in their use. In addition, containment or diversionary structures can be constructed of available materials (earth, absorbents, gravel, sand bags, wooden materials, snow, ice, debris, etc.) which can divert oil to a recovery point or prevent oil from reaching a critical area.

b. Once the spill is contained and stabilized, shovels, brooms and similar tools can be utilized to collect the contaminated materials for placement in drums. All drums shall be properly labeled and securely staged pending appropriate off-Site management.

Post-Cleanup Procedures

At the conclusion of any cleanup operation, it shall be the responsibility of the primary and/or secondary SPCC/Spill Response Coordinators (or there authorized designee) to ensure that wastes generated during the incident have been collected and properly disposed of in accordance with applicable regulations, emergency equipment has been cleaned and spill response supplies have been restocked for future use.

2.7.3 MassDEP Notification and Reporting Requirements

Any spill or discharge of oil onto the lands or waters of Massachusetts, at or above the Massachusetts RQ, must be reported to the MassDEP. The reportable quantity for petroleum oils (i.e. diesel fuel, #2 fuel oil, hydraulic oil, waste oil, etc.) is 10 gallons. In addition, the following conditions must also be reported to the MassDEP:

- a sudden, continuous or intermittent release to the environment of any quantity of oil or waste oil that results in the appearance of a sheen on surface water;
- any release of oil that is indirectly discharged to the environment by means of discharge to a stormwater drainage system;
- any release of oil that is indirectly discharged into the environment by means of discharge to a sanitary sewerage system.

This notification must be made within two (2) hours of detection. Exceptions to reporting requirements that may apply to this facility are in the case of a release of oil that is completely contained within a structure engineered to fully contain the release.

The primary and/or secondary SPCC/Spill Response Coordinators (or their authorized designee, environmental consultant or LSP) are responsible for determining whether notification to the MassDEP is required, and for making the appropriate notification.

Once it has been determined that notification is required, verbal notification can be made to the following:

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
Western Regional Office
436 Dwight Street
Springfield, Massachusetts 01103
(413) 784-1100 (business hours)
(888) 304-1133 (24 hours per day/7 days per week)

The notification generally must include the following:

1. The location and address where the release occurred;
2. The time and date when the release occurred;
3. The time and date when BMC obtained knowledge of the release;
4. The time and date when oral notification was made to the MassDEP;
5. The notification criteria met;
6. The names and amounts of oil and/or hazardous material released;
7. The names and mailing addresses of the owners of all properties impacted by the release;
8. The name and address of the person providing the notification of the release;
9. The affiliation of the person(s) notifying to the Site of the release; and
10. Such other information as the MassDEP may request.

2.7.4 Federal Notification and Reporting Requirements

Any spill of oil causing a sheen or visible layer of oil on a navigable waterway must be reported verbally to both the USEPA and the US Coast Guard. The primary and/or secondary SPCC/Spill Response Coordinator for BMC is responsible for making this notification.

A telephone call to the National Response Center (800) 424-8802 [24-hour hotline] satisfies the requirement for notifying both the USEPA and the US Coast Guard. In addition, a written report must be prepared any time one of the following occurs:

1. Any one oil spill greater than 1,000 gallons onto a navigable waterway; and
2. Any two oil spills causing a visible sheen or layer on a navigable waterway in a twelve-month period.

If it is determined that a written report must be prepared, the following information must be reported to the Regional Administrator of the USEPA within 60 days of the event:

1. Name of the facility;
2. Name(s) of owner or operator of the facility;
3. Location of the facility;
4. Date of initial facility operation;
5. Maximum storage or handling capacity of the facility and normal daily throughput;
6. Description of facility, including maps, flow diagrams, and topographical maps;
7. A complete copy of this SPCC Plan, with any amendments;
8. The cause(s) of the spill, including a failure analysis of the system in which the failure occurred;
9. The nature and quantity of the spilled material;
10. The corrective action and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;
11. Additional preventive measures taken or contemplated to minimize the possibility of a

recurrence; and

12. Such other information as the Regional Administrator may reasonably require, pertinent to the SPCC Plan or spill event.

This information must be sent to the following address:

Regional Administrator - USEPA Region 1
5 Post Office Square - Suite 100
Boston, MA 02109-3912

2.8 Direction, Rate of Flow and Total Quantity of Potential Discharge – 40 CFR 112.7(b)

2.8.1 Bulk Aboveground Storage Tanks

The most likely release scenario related to AST-1 through AST-5 would be during a delivery of oil to one or more of the AST systems from the petroleum unloading area. In the event of a leaking or disconnected hose, or leak or rupture of the tank truck, spilled oil could flow onto the ground within the petroleum unloading area. The unloading area is a concrete structure containing an approximate 1% slope (east to west) located between the elevated concrete pad for AST-1 through AST-4 and the footprint of Building 117, within the central portion of the Site. The unloading area contains an approximate 10-inch asphalt berm at the eastern (high) end and a valve operated grate-drain at the western (low) end of the structure which discharges to the WWTP. This drain is normally closed during Barnhardt operations and the unloading area has the capacity to contain approximately 4,900 gallons.

The quantity of discharge is variable depending on the size of the rupture and the time elapsed prior to detection. Since the driver of the tank truck must never leave the unloading area during delivery, the duration of the spill would be equal to the transport driver's reaction time to stop the release. Estimating and assuming the reaction time to be 30 seconds and the maximum flow rate

to be 150 gallons per minute (GPM) [2.5 gallons per second (GPS)], the maximum volume of the spill is estimated at 75 gallons; 2.5 gallons for each second of discharge. In the event of this release scenario, it is likely that the release would be contained within the petroleum unloading area.

A "worst case" scenario could involve a complete discharge of oil from the largest compartment on a trailer truck (estimated at 4,500 gallons for bulk deliveries) due to a defective valve or other circumstance that prevented the cessation of the discharge. In the event of a "worst-case" release, petroleum would overflow the containment of the petroleum unloading area (~4,900 gallons) in an easterly direction and further migrate: 1) easterly in the direction of CV-1 and/or the stormwater structures northeast of the unloading area; and/or 2) southwesterly in the direction of CV-2. Refer to Figure 2 for a depiction of the petroleum unloading area, aforementioned drainage features and anticipated direction(s) of sheet flow across the facility.

Comparison of Potential Conditions for Release of Oil
(AST-1 through AST-4 [20,000 gal.] and AST-5 [500-gal.])

Type of Release	*Estimated Rate of Release (GPM)*	*Estimated Quantity of Release (Gal)*
Transfer Spill	~150	<75
Failure of Trailer Truck Compartment	NA	4,500

Under typical conditions and in consideration of the double-walled ASTs, facility design, salient containment and drainage controls and SPCC measures discussed herein, a release of oil from one of these bulk ASTs is not anticipated to impact navigable waters.

2.8.2 Interior 55-gallon Storage

For the 55-gallon drums stored at D-1, one of two most likely release scenarios would be during the transfer of oil from the drums. The transfer of oils from D-1 to facility machinery is typically performed with 5-gallon cans and manual hand pumps/hoses. Transfer operations are performed on the spill pallet. A typical release of oil from D-1 would be limited to the volume of a can being filled or the contents of the fill hose in the transfer operation (~5 gallons) and would be retained in the spill pallet.

Another release scenario from the drums at D-1 would be a slow leak from failure of the drum. This type of release may release oil at a rate of 3 gallons a day (assuming a rate of 0.1 gallons per hour). A major malfunction of a valve may release oil at a faster rate which may result in a release of approximately 2 to 5 gallons per hour. A "worst case" scenario would involve a complete discharge of oil a 55-gallon drum. This would most likely occur due to an act of vandalism, accidental damage or corrosion of the unit, leading to a structural failure. In this scenario, it's possible that the entire contents (55 gallons) would be released.

Comparison of Potential Conditions for Release of Hydraulic/Motor Oils (Up to four 55-Gallon Drums)

Type of Release	*Estimated Rate of Release (GPM)*	*Estimated Quantity of Release (Gal)*
Vandalism	Immediate	55
Valve Failure	0.1 to 5	<2.5 to 55
Dispensing Spill	5	5

Due to the frequent presence of BMC in this area, a release of oil under these scenarios would likely be detected within 48 hours or less. In any case, the released oil (ranging from 2.4 to 55 gallons) would be retained in the spill pallet. Under typical conditions and in consideration of facility design, a release of oil from D-1 is not anticipated to impact navigable waters.

2.8.3 Exterior 55-gallon Storage

For the 55-gallon drums of used oil at D-2, one of two most likely release scenarios would be during the transfer of waste oil drums from the D-2 enclosure to waste oil contractor vehicle. The 55-gallon drums of waste oil generated through operations at the Barnhardt facility are transported off-Site by a waste oil contractor for reuse. A typical release of waste oil would involve spilling the contents of the drum during a loading operation. The loading of the drums is done using a lift gate. The following spill prevention measures have been developed for this loading operation. The drum lids are verified to be secure and the drums free of leaks. During transfer operations, wheel chocks are placed under the truck's wheels to prevent movement of the truck during loading operations. The waste oil contractor attends the truck at all times during the loading operation and spill response gear is stored (Building 118) in close proximity to the loading area for use in diverting and adsorbing any oil and/or oily liquids. Oil released during the transfer operation is anticipated to be retained within the immediate area of the spill; however, the oil may flow in a southerly direction during a precipitation event.

A typical release of used motor oil would be limited to the volume of a can being poured into the drum. This volume would be approximately 5 gallons that would be retained on the spill pallet of D-2 or the surrounding concrete slab. Oil released to the concrete pad is anticipated to be retained in the area of the spill; however, the oil may flow in a southerly direction during a precipitation event.

Another release scenario from the drums at D-2 would be a slow leak from failure of the drum. This type of release may release oil at a rate of 3 gallons a day (assuming a rate of 0.1 gallons per hour). A major malfunction of a valve may release oil at a faster rate which may result in a release of approximately 2 to 5 gallons per hour. A "worst case" scenario would involve a complete discharge of oil a 55-gallon drum. This would most likely occur due to an act of vandalism, accidental damage or a corrosion of the unit, leading to a structural failure. In this scenario, it's possible that the entire contents (55 gallons) would be released. In the case of a

release of oil due to transfer to D-2 or from a slow leak, the released oil (ranging from 2.4 to 55 gallons) would be retained in the spill pallet of D-2.

A "worst case" scenario could involve the discharge of oil from a 55-gallon drum due to an accident during loading activities from D-2 for off-Site reclamation of the used oils. In the event of a "worst-case" release, used oils would likely be retained in the immediate area of the release, but during a precipitation event would flow into the drainage trough south of D-2 which is connected to the on-Site WWTP. Refer to Figure 2 for a depiction of the D-2 area, aforementioned drainage feature and anticipated direction(s) of sheet flow across the facility.

Comparison of Potential Conditions for Release of Used Hydraulic/Motor Oils (Up to four 55-Gallon Drums)

Type of Release	*Estimated Rate of Release (GPM)*	*Estimated Quantity of Release (Gal)*
Vandalism	Immediate	55
Discharge Valve Failure	0.1 to 5	<2.5 to 55
Transfer Spill	5	5
Removal Spill	Immediate	55

Due to the frequent presence of Barnhardt personnel in this area, it is likely that a release of oil under these scenarios would be detected within 48 hours or less. Under typical conditions and in consideration of facility design, a release of oil from D-2 is not anticipated to have the potential to impact navigable waters.

2.8.4 Hydraulic Oil Pump Reservoirs

For P-1, P-2A/P-2B and P-3, one release scenario would be during the transfer of hydraulic oil between a reservoir and a 5-gallon container. The transfer of oils to/from these hydraulic oil reservoirs is typically performed with 5-gallon cans and manual hand pumps/hoses. Transfer

operations are performed within the concrete containment structure in which the reservoirs are located. A typical release of oil from these hydraulic oil reservoirs would be limited to the volume of a can and/or the contents of the fill hose in the transfer operation. In this case the volume would be approximately 5 gallons that would be retained in the concrete containment structure. If hydraulic oil was released outside of the concrete containment structure it would be retained on the concrete floor slab of Building 134 (P-1 and P-2A/P-2B) or Building 118 (P-3).

Another release scenario from these hydraulic oil reservoirs would be a slow leak from a faulty gasket or fitting on the unit. This type of leak may release oil at a rate of 3 gallons a day (assuming a rate of 0.1 gallons per hour). A major malfunction of a valve may release oil at a faster rate which may result in a release of approximately 2 to 5 gallons per hour. A "worst case" scenario would involve a complete discharge of hydraulic oil from the reservoir. This would most likely occur due to an act of vandalism, accidental damage or corrosion of the unit, leading to a structural failure. In this scenario, it's possible that the entire contents (100 to 115 gallons) would be released.

Comparison of Potential Conditions for Release of Hydraulic Oil

Type of Release	*Estimated Rate of Release (gallons per hour)*	*Estimated Quantity of Release (Gal)*
Vandalism	Immediate	100 to 115
Discharge Valve Failure	0.1 to 5	<2.5 to 115
Transfer Spill	5	5

Due to the frequent presence of BMC in these areas, it is likely that a release of oil under these scenarios would be detected within 48 hours or less. In any case, the released oil (ranging from 2.4 to 115 gallons) would be retained in the concrete containment structure of the respective reservoir(s). Under typical conditions and in consideration of facility design, a release of oil

from one of these hydraulic oil reservoirs is not anticipated to have the potential to impact navigable waters.

2.8.5 Electrical Transformers

A release of transformer oil from T-1 would initially be retained within the concrete curbing associated with the pad of T-1. However, a larger could overflow the concrete pad area and migrate in the direction of CB-1 and/or down the grassy sloped embankment to the west. CB-1 contains a discharge valve that can be shut in the event of a release from T-1, to prevent a release of oil from impacting the Tailrace.

A release of transformer oil from T-2 would initially be retained within the concrete curbing associated with the pad of T-2; however, a larger release would be anticipated to overflow the concrete pad area and migrate: 1) southeasterly in the direction of Main Road (Route 112); 2) westerly in the direction of the Tailrace Brook; and/or 3) northwesterly down the paved access road of the facility. SMH-6 is located north of T-2 and discharges to the WWTP.

The most likely release scenario from the transformers would be a slow leak from a faulty valve or flange. This type of release may release oil at a rate of 3 gallons a day (assuming a rate of 0.1 gallons per hour). Due to the frequent presence of BMC personnel in this area, it is likely that a release of oil under these scenarios would be detected within 48 hours (~5 gallons released).

A "worst case" scenario would involve a complete discharge of oil from one of the transformers. This would most likely occur due to an act of vandalism, accidental breakage or a buildup of heat and vapors within the unit, leading to a structural failure. In this scenario, it's possible that the entire contents of T-1 (750 gallons) or T-2 (250 gallons) would be released.

Comparison of Potential Conditions for Release of Transformer Oil (T-1, 750 gallons and T-2, 250 gallons)

Type of Release	*Estimated Rate of Release (gallons per hour)*	*Estimated Quantity of Release (Gal)*
Catastrophic (major)	Immediate	250 (T-2) to 750 (T-1)
Discharge Valve Failure (major)	2-5	48 - 120
Discharge Valve Failure (weeping)	0-0.1	<5

Due to the frequent presence of BMC at the Site, it is likely that a release of oil under these scenarios would be detected within 48 hours or less. Under typical conditions and in consideration of facility design, a release of oil from one of these transformers is anticipated to be addressed prior to impacting navigable waters.

2.8.6 Spill Potential

The following table summarizes the types and volumes of oil located at the Barnhardt facility and the potential types and volumes of oil spills.

Source	Type of Failure	Volume (gallons)	Max. Rate (gal/hr)	Direction of Flow	Containment
Oil Transfer Activities – Barnhardt Manufacturing Co.					
AST-1	Transfer Spill	75 – 4,500	(1)	(2)	(8)
AST-2	Transfer Spill	75 – 4,500	(1)	(2)	(8)
AST-3	Transfer Spill	75 – 4,500	(1)	(2)	(8)
AST-4	Transfer Spill	75 – 4,500	(1)	(2)	(8)
AST-5	Transfer Spill	75 – 4,500	(1)	(2)	(8)
D-1	Transfer Spill	5 – 55	(1)	(3)	(9)
D-2	Transfer Spill	5 – 55	(1)	(4)	(9)
P-1/P-3	Transfer Spill	5 – 100	(1)	(5)	(10)
P-2A/P-2B	Transfer Spill	5 – 115	(1)	(5)	(10)
T-1	Transfer Spill	750	(1)	(6)	(11)
T-2	Transfer Spill	250	(1)	(7)	(11)

Source	Type of Failure	Volume (gallons)	Max. Rate (gal/hr)	Direction of Flow	Containment
Oil Storage Activities – Barnhardt Manufacturing Co.					
AST-1	Compartment Failure	4,500	(1)	(2)	(8)
AST-2	Compartment Failure	4,500	(1)	(2)	(8)

Source	Type of Failure	Volume (gallons)	Max. Rate (gal/hr)	Direction of Flow	Containment
AST-3	Compartment Failure	4,500	(1)	(2)	(8)
AST-4	Compartment Failure	4,500	(1)	(2)	(8)
AST-5	Compartment Failure	4,500	(1)	(2)	(8)
D-1	Failure of Drum	55	(1)	(3)	(9)
D-2	Failure of Drum	55	(1)	(4)	(9)
P-1/P-3	Failure of Pump Reservoir	100	(1)	(5)	(10)
P-2A/P-2B	Failure of Pump Reservoir	115	(1)	(5)	(10)
T-1	Failure of Unit	750	(1)	(6)	(11)
T-2	Failure of Unit	250	(1)	(7)	(11)

Notes:

1. The rate of discharge is dependent on: 1) the size of the failure; and 2) the location of the failure on the container or tank. For tank/container failure, rate is assumed to equal entire contents of the largest compartment in one hour.
2. The petroleum would be retained within the concrete containment of the unloading area (~4,900 gallons); however, a release in excess of the containment capacity would be anticipated to migrate beyond: 1) east/southeasterly toward the catch basins/sewer manholes and stormwater containment valve CV-1; and/or 2) southwesterly toward stormwater containment valve CV-2.

Precipitation events and/or a delay in response may exacerbate the migration of oils toward these structures and subsequent surface waters.

3. The petroleum is predicted to be retained within the spill pallet. A larger release or accident beyond the immediate area of the spill pallet would be expected to be retained on the concrete floor within Building 118.
4. The used oil is predicted to be retained within the spill pallet. A larger release or accident beyond the limit of the spill pallet would be expected to be retained on the concrete slab immediately east of Building 118.
5. The petroleum is predicated to be retained within the concrete containment in which P-1, P-2A/P-2B or P-3 are located. A larger release or accident beyond the limit of one of these concrete containment structures would be expected to be retained on the concrete slab floor within Building 134 or Building 118. If both hydraulic reservoirs of P-2A/P-2B failed simultaneously, the released oils would override the existing containment structure and be retained on the concrete floor slab within Building 134. If hydraulic oils were released from the facility process piping with P-1, the oils would be retained on the concrete floor slab within Building 134. A release from P-3 would be retained on the concrete floor slab in Building 118.
6. The petroleum would be anticipated to be initially retained within the concrete curbing associated with the pad of T-1; however, a larger release is anticipated to flow beyond: 1) southerly in the direction of CB-1; and/or 2) southwesterly down the grassed slope.
7. The petroleum would be anticipated to be initially retained within the concrete curbing associated with the pad of T-2; however, a larger release is anticipated to flow beyond the concrete pad area and migrate: 1) southeasterly in the direction of Main Road (Route 112); 2) westerly in the direction of the Tailrace; and/or northwesterly down the access of the facility.
8. Passive Secondary Containment is considered to be: 1) the double-walled construction and tank monitoring systems of AST-1 through AST-5; 2) the containment capacity of the unloading area. Active Secondary Containment is considered to be the closure of the valves to CV-1/CV-2 and the drainage troughs, use of drain mats and the facility Spill Kits.
9. Passive Secondary Containment is considered to be: 1) the spill pallets associated with D-1 and D-2 areas. Active Secondary Containment is considered to be the facility Spill Kits.
10. Passive Secondary Containment is considered to be the concrete containment structure associated with P-1 and P-2A/P-2B. Active Secondary Containment is considered to be the facility Spill Kits.
11. Passive Secondary Containment of the oil-filled electrical equipment is considered to be the U shaped curbing around the units. Active Secondary Containment is considered to be the facility Spill Kits.

2.9 Prevention Systems: Containment and Diversionary Structures and Equipment Utilized to Prevent a Discharge from Reaching Navigable Waters – 40 CFR 112.7(c)

At a minimum, one or more of the following means and methods (or an equivalent) have been evaluated for the containment and/or diversion of a potential release of oil from the facility:

- Dikes, berms, or retaining structures sufficiently impervious to contain oil;
- Curbing;
- Oil water separators, culverts, gutters or other drainage systems;
- Weirs, booms or other barriers;
- Spill diversion structures/retention ponds; and/or
- Spill kits and sorbent materials.

2.9.1 Spill Kits

Spill Kits of cleanup equipment for oil shall be maintained at the facility and are designated for review of materials during monthly Site inspections by BMC personnel. These spill kits should include the following items or their equivalents in volumes appropriate for the location in which it is to be stored for use:

- Rolls, booms and pads of absorbent material;
- Granular absorbent materials;
- Drain mat blockers;
- Caution Tape;
- 55-gallon drum containers;
- Shovels, brooms, boots and gloves.

BMC personnel are responsible for checking the spill kits for completeness during scheduled inspections, and shall be restocked following each use. BMC has the responsibility of

maintaining an adequate supply of spill response materials. Additional items may be added to the spill kits as deemed necessary. The spill kits should only be used by individuals who are trained in their use.

In addition to this equipment, containment or diversionary structures can be constructed of available materials (earth, absorbents, gravel, sand bags, wooden materials, snow, ice, debris, etc.) which can divert oil to a recovery point or prevent oil from reaching a critical area.

2.9.2 BMC Facility

For BMC's Colrain facility, a combination of *Passive Secondary Containment* by way of the double-walled ASTs and aforementioned containment designs and/or retaining structures and *Active Secondary Containment* by way of spill kit/sorbent materials present at the facility has been put in place to manage a potential release of oil from this location.

2.9.3 Practicality of 40 CFR 112.7(c) – 40 CFR 112.7(d)

The above-noted measures are considered practical for BMC and shall be implemented as part of the SPCC Plan.

2.10 Inspections, Tests and Records – 40 CFR 112.7(e)

Barnhardt personnel are typically present at the Site during all business hours. We anticipate that Barnhardt personnel would observe signs of equipment deterioration, potential failures and releases of oil during the normal business operations and through the course of monthly inspections at the Site. BMC indicates that the boiler operators are on Site 24 hours per day/7 days a week and during the weekends when the facility is not running, the boiler operators conduct Site inspection walks around the facility every few hours.

At a minimum, the employees of BMC whom are responsible for the handling of oils shall be trained to observe the ASTs, valves, piping and related appurtenances for potential problems

and/or signs of leakage, on a (minimum) monthly basis. If a problem is encountered, the employee shall inform appropriate BMC staff of the observation(s) made, whom in turn, will undertake the appropriate corrective action(s). Routine Inspection Forms are presented in Appendix B. During the inspection, Barnhardt will observe the following:

- Condition and evidence of oil spills from the Site bulk ASTs;
- Conditions and evidence of oil spills from AST ancillary piping;
- Condition and evidence of oil spills from the off-loading area;
- Condition and evidence of oil spills from stored 55-gallon drum(s) at D-1 and D-2;
- Condition and evidence of spills from the Site transformers T-1 and T-2;
- Condition and evidence of spills from the hydraulic oil reservoirs at P-1, P-2A/P-2B and P-3;
- Availability and appropriate quantities of spill response equipment;
- Adequate security and lighting; and
- Actions needed to correct potential issues.

All ASTs, valves, piping, related appurtenances, catch basins, spill controls, and emergency response materials/equipment shall be inspected monthly by BMC employees. Each inspection shall be recorded, dated, signed and filed in an inspection binder. All items requiring action or consideration shall be noted on these forms and systematically "checked off" upon completion or correction. Such forms shall be retained for three (3) years, as part of the SPCC Plan maintained at the Main Office.

Federal considerations for integrity testing of ASTs are covered under USEPA Code 40 CFR Part 112.8(c)(6), which require an owner/operator of a facility to: 1) determine, in accordance with industry standards [note that Industry Standards for tanks and containers includes American Petroleum Institute (API) 653 and Steel Tank Institute (STI) (SP001)] the appropriate

qualifications for personnel performing the tests and inspections, the frequency and type of testing and inspections, which take in to account container size, configuration and design (i.e. shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried); 2) test each AST for integrity on regular scheduled basis and following material repairs/alterations; and 3) to frequently inspect exterior of tanks/foundations for deterioration and oil or water accumulation in dike(s) and maintain these inspection/testing records at the facility.

Examples of inspections include: visual inspections, hydrostatic, radiographic, ultrasonic, acoustic emissions testing, or other systems of non-destructive testing. Formal external inspections conducted by an authorized inspector shall be conducted every 5 years or RCA/4N years [this is an equation in API 653 allowing for the computation of a tank-specific inspection frequency].

Alternatively to the inspection schedules provided under Industry Standards of STI/API, an owner/operator may employ a Risk Based Inspection (RBI) under STI or API, which combines Site-specific tank construction/spill prevention measures/spill impact likelihood into consideration when formulating a schedule for interior inspections (i.e. the formulation of a Risk Ranking Matrix).

An RBI would need to be prepared by a qualified inspector/engineer/knowledgeable and experienced in tank installations/foundations and corrosion, and familiar with RBI preparations. Furthermore, an RBI must be reviewed every 10 years to determine if it remains valid to the facility. An RBI may increase or decrease the frequency of internal inspection, depending on the findings.

An RBI has not been employed by BMC as part of this SPCC Plan. If one is implemented in the future, it shall be made part of an SPCC Amendment. As part of this SPCC Plan, it is recommended that a schedule for integrity testing of the bulk ASTs be evaluated and

implemented in accordance with the applicable industry standard(s) and by qualified personnel. BMC's Colrain facility does not contain underground product piping associated with the ASTs referenced in this SPCC Plan.

Vegetation shall not be allowed to grow in oil containment areas. Similarly, vegetative debris (if present, as accumulated) shall be promptly removed from oil containment areas.

As part of this SPCC Plan, it is recommended that each AST and associated product piping be appropriately marked for content with an NFPA sticker, or equivalent.

BMC's bulk ASTs AST-1 through AST-4 are greater than 10,000 gallons, therefore, the tanks have been registered with the MassDEP and Annual AST Inspections, under MGL c. 148, 502 CMR 5.00 and 527 CMR 9.00, are performed and submitted to the Department of Fire Services (DFS) for these ASTs. The annual visual inspections performed on AST-1 through AST-4 and submitted to DFS shall be retained as part of this SPCC Plan. In addition, the tanks a permitted with the local fire department.

If a source/potential source of leak is identified on an oil-filled container at the Site, the following actions will be taken in accordance with 527 CMR 9.07(h). If testing or observation has confirmed that the source of the leak is piping for a particular oil-filled container, the container will be taken out of service immediately, and the piping will be repaired or replaced to appropriate standards. If testing or observation has confirmed that the source of the leak is a particular oil-filled container, the container will be emptied of all its product within 24 hours, and the tank will be repaired or replaced to appropriate standards.

As previously discussed, Barnhardt normally keeps the discharge valve of the drainage grate in the unloading area fully closed. In accordance with 40 CFR part 112.8(2), prior to discharging uncontaminated water from the drainage structure associated with the unloading area, Barnhardt

must: 1) inspect the retained water to ensure that its presence will not cause a discharge of oil to navigable waters via the WWTP; and 2) open the valve and reseal it closed following drainage under the supervision of Barnhardt personnel.

As previously discussed, Barnhardt maintains two (2) stormwater control valves CV-1 and CV-2 that can be closed and drain mat blockers that can be placed over catch basins to minimize the potential for a release of oil beyond diked areas of the facility from impacting navigable waters. If closed, BMC will inspect retained water at CV-1 and/or CV-2 prior to reopening the valves to ensure that its presence will not cause a discharge of oil to navigable waters.

Barnhardt personnel will complete the inspection checklists in Appendix B during each monthly SPCC related inspection. Barnhardt will retain the inspection records for three (3) years, as part of the SPCC Plan maintained at Building 134.

2.11 Personnel, Training for Discharge Prevention Procedures – 40 CFR 112.7(f)

BMC is responsible for properly training the salient employees in the operation and maintenance of equipment to prevent a release of oil under this SPCC Plan. Such training shall be provided to ensure BMC employees can properly identify the release and report the nature of the release to the Spill Response Coordinator in all cases.

If the spill is an *Incidental Spill* as defined in Section 2.5, the BMC employees may perform response actions to stop, contain, and clean up the spill if it is safe to do so. If the spill is a *Large Spill* as defined in Section 2.5, BMC employees may only perform response actions to stop and/or contain the spill, if it is safe to do so. An outside emergency response contractor will be contacted by the BMC Spill Coordinator to perform spill cleanup operations.

BMC will provide First Responder Awareness Level Training to personnel that could potentially contact oils (i.e. #2 fuel oil, ULS #2 diesel, hydraulic oils and/or diesel fuel) in the operation and

maintenance of equipment to prevent discharges, discharge procedure protocols, applicable pollution control laws, and provisions of this SPCC Plan, general facility operations and appropriate notification procedures.

In addition, as part of First Responder Awareness Level Training, BMC will hold spill prevention briefings for appropriate individuals at least once annually, to review spill prevention practices and to update personnel on recently implemented procedures. Spill briefings shall highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. A record of all personnel training (including sign-in sheets and topics covered) shall be maintained by BMC for a minimum of three (3) years, as part of the SPCC Plan maintained at the Main Office.

Health and Safety

BMC operating procedures do not authorize employees to conduct emergency response operations as defined in OSHA 29 CFR 1910.120. *Incidental Spill*s are not considered to be emergency response operations. *Incidental Spill*s are considered by OSHA at 29 CFR 1910.120 to be releases that can be "absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel. BMC considers spills of oil of less than 10 gallons to be *incidental spills*.

BMC operating procedures direct employees observing an actual or potential oil release, regardless of size, to make appropriate internal notifications and to take steps to stop and contain the spill, if it is safe to do so.

Outside contractors will be summoned to conduct the cleanup for a *large spill*. However, in *incidental spill* situations, BMC employees may take actions to stop, contain, and clean up the spill, if it is safe to do so.

Only properly trained, hazardous materials responders may initiate response actions to a release of oil. BMC employees that could potentially contact petroleum hydrocarbons are provided First Responder Awareness Level Training. BMC personnel are qualified to, at minimum, identify a release and to generally perform defensive actions in response to a release of oil. These defensive actions generally include containing the release from a safe distance and preventing exposures (human or environmental) to the released oils.

2.12 Security Measures – 40 CFR 112.7(g)

BMC has employed, the following security measures at the facilities:

- *Fencing* – While select areas of the Colrain facility contain fencing, the locations of oil storage discussed herein do not specifically or solely rely upon fencing for security.
    - The bulk ASTs are located within the central portion of the Site and less likely to be subject to potential vandalism.
- *Containment Valves* – There are several discharge valves associated with sheet flow across the facility, stormwater control and drainage features at the facility. Each bulk AST is equipped with a gate valve and the associated supply piping further contains ball valves to select between fuel oil supplies.
- *Starter Controls* – during off-hours, access to the starter controls for fuel transfer pump(s) at the facility are controlled by being locked in the OFF position and power is shut off to the transfer pumps.
- *Cap or Blank Flange Loading/Off-Loading Connections* – The AST loading/off-loading connections are securely capped and locked when not in use.
- *Lighting to assist in the Discovery of a Discharge or Vandalism* - The exterior of the facility is illuminated during dark hours by lighting. Furthermore, access to interior of the facility buildings can be restricted by locked entries. These factors are considered adequate such that a release could reasonably be discovered and that vandalism is discouraged at the facility.

2.13 Tank Truck Loading/Off-Loading Area Containment – 40 CFR 112.7(h)

The bulk off-loading area is a concrete structure containing an approximate 1% slope, containing an approximate 10-inch asphalt berm at the eastern (high) end and a valve operated drainage trough at the western (low) end of the structure which discharges to the WWTP. This drain is normally closed during Barnhardt operations and the unloading area has the capacity to contain approximately 4,900 gallons.

This retention capacity further provides for sufficient free board for precipitation in the dike. The adequately sized concrete containment used for vendor bulk off-loading to AST-1 through AST-4 is considered a *Passive Secondary Containment* system. Current design further provides for *General Secondary Containment* required under SPCC Rule for vendor(s) bulk off-loading.

As available, BMC personnel shall oversee vendor's bulk off-loading activities and shall ensure that the facility provides for general containment under SPCC Rule during bulk off-loading. Prior to conducting a bulk delivery, BMC shall notify the vendor(s) of the requested delivery, and BMC shall confirm the type and volume of oil(s) to be delivered to each tank, and visually confirm that the tank gauges indicate sufficient room for the delivery.

2.14 Field Constructed ASTs – 40 CFR 112.7(i)

The ASTs at the BMC Colrain facility are not of a field-constructed design.

2.15 Conformance with other Applicable Requirements – 40 CFR 112.7(j)

This SPCC Plan is designed to achieve compliance with Federal Regulation 40 CFR Part 112, and the MCP (310 CMR 40.0000).

3.0 SUBPART B - CONSIDERATIONS UNDER 40 CFR 112.8

3.1 General Requirements - 40 CRF 112.8(a)

BMC shall operate in compliance with the requirements of 40 CFR Part 112.7, as outlined above under Section 2.0 of this SPCC Plan, and the specific discharge prevention and containment procedures listed in 40 CFR Part 112.8, as provided below.

3.2 Facility Drainage - 40 CRF 112.8(b)(1) and (2) - Diked Areas

Drainage from diked areas is discussed under Section 2.4 – 40 CFR Part 112.7(a)(3)(iii).

3.3 Facility Drainage - 40 CRF 112.8(b)(3) and (4) - Un-Diked Areas

Above grade piping at the facility is located in areas such that a release from piping would be anticipated to be contained within the facility and could be identified and adequately assessed and addressed prior to impacting navigable waters.

The area where bulk deliveries are made to AST-5 and waste oils are collected from D-2 is located on the exterior concrete platform between Building 117 and Building 118. Sheet flow across the area is anticipated to be southerly. Sheet flow will discharge to the nearby drainage trough that ultimately discharges to the Site WWTP.

As previously discussed, Barnhardt maintains two (2) stormwater control valves CV-1 and CV-2 that can be closed and drain mat blockers that can be placed over catch basins to minimize the potential for a release of oil beyond diked areas of the facility from impacting navigable waters. If closed, BMC will inspect retained water at CV-1 and/or CV-2 prior to reopening the valves to ensure that its presence will not cause a discharge of oil to navigable waters. These features are intended to control a spill in the un-diked/non-containment areas of the facility.

Sheet flow across the facility is provided on Figure 2. If a release of oil migrates beyond the containment areas of the facility, BMCs efforts should focus on ensuring that stormwater control valves are shut, drainage lines are closed, and stormwater catch basins protected to minimize the potential for the released oils to impacted adjacent surface water bodies/navigable waters.

3.4 Bulk Storage Containers - 40 CRF 112.8(c)(1)

BMC maintains the ASTs referenced under this SPCC Plan in a manner that allows employees to readily identify any potential issues. The above grade oil storage containers are readily visible and located in areas where employees work or frequently travel and identify a potential leak. The ASTs at the facility are inspected monthly. Oil storage at BMC's Colrain facility are designed and constructed using sound engineering practices, thereby reducing the potential for oil spills.

Where applicable, the storage areas have *passive secondary containment* and *active secondary containment* controls that would assist in containing a spill and/or directing the release away from navigable waters.

The BMC facility is routinely patrolled by the on-Site employees. All visitors are required to sign-in at the Main Office prior to gaining access to the facility. Access to bulk ASTs at the facility is restricted to authorized personnel. Access to the interior oil containers is restricted by BMC personnel and locked entries. The bulk storage containers are all factory designed and built, which provides for a high degree of standardization and reduces the potential for an oil spill.

The interior oil storage compartments of process equipment and 55-gallon drums located within Building 118 and the exterior D-2 storage container are constructed of steel, are non-field erected, and are appropriate for the storage of petroleum. The tank systems are designed so as not to add pressure to the vessels beyond the petroleum stored therein.

The five (5) exterior ASTs located at the facility are constructed of steel, are non-field erected, and are appropriate for the storage of petroleum under a variable seasons and temperatures and are designed so as not to add pressure to the vessels beyond the petroleum stored therein.

3.5 Capacity of the Secondary Containment Area - 40 CRF 112.8(c)(2)

3.5.1 Interior Oil Storage

Passive Secondary Containment for the interior P-1 and P-2A/P-2B oil reservoirs is greater than the maximum volume of oil stored in a single container in these locations. Containment at P-1 is greater than 100 gallons and containment at P-2A/P-2B is estimated at 145 gallons. P-3 containment is considered the surrounding concrete floor slab.

Passive Secondary Containment for the interior D-1 oil storage is the spill pallets which are greater than the maximum volume of oil stored in a single drum in this location.

Furthermore, the competent concrete floor slabs (Buildings 118 and 134) and lack of floor drains (Building 118) provides further containment from a release in these locations to impact navigable waters.

3.5.2 Exterior Oil Storage

Passive Secondary Containment for the bulk ASTs (AST-1 through AST-5) are the double-walled tank designs, associated interstitial sensor controls and concrete berm located around AST-5. The storage capacity of the containment beneath AST-5 is less than 500 gallons and was not constructed or intended to serve as containment for the entire contents of the tank, but rather as containment for incidental spillage or minor leaks.

Proper maintenance and oversight of the interstitial monitoring devices and visual inspection of each AST is a critical component to this SPCC Plan since the failure of the inner/outer walls of one of these ASTs could result in a release of oil that threatens to impact nearby surface water.

3.5.3 Vendor Bulk Off-Loading Area

The bermed concrete pad for vendor bulk off-loading operations to AST-1 through AST-4 is designed to direct the flow of liquids on the pad into a drainage trough, which leads to the Site WWTP. The valve to the drainage trough is normally closed and the pitched slope/berm of the containment pad will contain approximately 4,900 gallons, as *Passive Secondary Containment*, and would contain a "worst-case" release associated with BMC's vendor off-loading operations.

Furthermore, the current design further provides for *General Secondary Containment* that is required under SPCC Rule for a vendor(s) bulk off-loading activities at the facility.

3.6 Methods to address Precipitation within Secondary Containment - 40 CRF 112.8(c)(3)

Precipitation that periodically collects in the AST diked area for AST-5 or around the U shaped curbing of T-1/T-2 is allowed to evaporate via natural processes. If oil sheen is present on accumulated water in these locations, sorbent booms and/or pads should be used to remove the sheen from the water.

Precipitation that periodically collects in the vendor bulk off-loading containment is allowed to evaporate via natural processes, or (if free of oils) is discharged into the WWTP. If oil sheen is present on accumulated water in this location, sorbent booms and/or pads should be used to remove the sheen from the water.

In extreme cases, water may be manually pumped out of the diked area(s) for appropriate management. In accordance with 40 CFR 112.8(b)(1) and (2), larger quantities of uncontaminated precipitation can be manually pumped out of the diked area(s) following a determination that a discharge of oil will not occur.

Note that this may require analytical testing to ensure that such accumulated water would not contain an RQ or Reportable Concentration (RC) of petroleum hydrocarbons under the MCP. Alternatively, the accumulated water can be pumped out of the dike for off-Site management under a BOL or Manifest.

Precipitation does not accumulate within the secondary containment measures of the facility interior oil storage locations and there are no discharges of collected stormwater from these locations.

3.7 Cathodically Protected Steel USTs - 40 CRF 112.8(c)(4) & (5)

According to BMC there are no USTs present at the Colrain facility used for the storage of oils. Therefore, this SPCC Plan does not consider Site USTs (that may be used for other facility processes not involving oils) subject to the requirements of 40 CFR Part 112.

3.8 Periodic AST Integrity Testing - 40 CRF 112.8(c)(6)

Refer to Section 2.10 Inspections Tests and Records which addresses the periodic testing of ASTs.

3.9 Leakage from Heating Coils - 40 CRF 112.8(c)(7)

Heating coils are not utilized by BMC at the Colrain facility.

3.10 Update or Engineer Containers to avoid a Release - 40 CRF 112.8(c)(8)

The four double-walled AST systems (AST-1 through AST-4) are used to store #2 fuel oil/ULS #2 diesel and are equipped with interstitial leak detection and an emergency vents and fill gauges. Leak detection sensors are activated if the inner or outer wall of a tank develops a leak. The double-walled AST system (AST-5) is used to store diesel fuel oil and is equipped with interstitial leak detection and an emergency vent and fill gauge. Leak detection sensors are activated if the inner or outer wall of a tank develops a leak.

The fuel oil pumps are situated in Building 117. The deactivation of power to the transfer pump(s) ceases the transfer operations from these bulk ASTs.

3.11 Observe Effluent Treatment - 40 CRF 112.8(c)(9)

As discussed herein, BMC operates a WWTP as part of its facility operations and discharges treated effluent to the North River under applicable permit.

As part of normal operations (and under this SPCC Plan) BMC observes effluent treatment equipment and operations at a frequency that would be expected to detect possible system issues/upsets that could cause a discharge of oil to reach navigable waters.

3.12 Promptly Address Visible Discharge - 40 CRF 112.8(c)(10)

Refer to Sections 2.10 and 3.5 which addresses this consideration.

3.13 Mobile or Portable Storage Containers - 40 CRF 112.8(c)(11)

According to BMC, mobile refuelers and/or portable storage containers storing oils that would be subject to SPCC rule are not utilized at this facility.

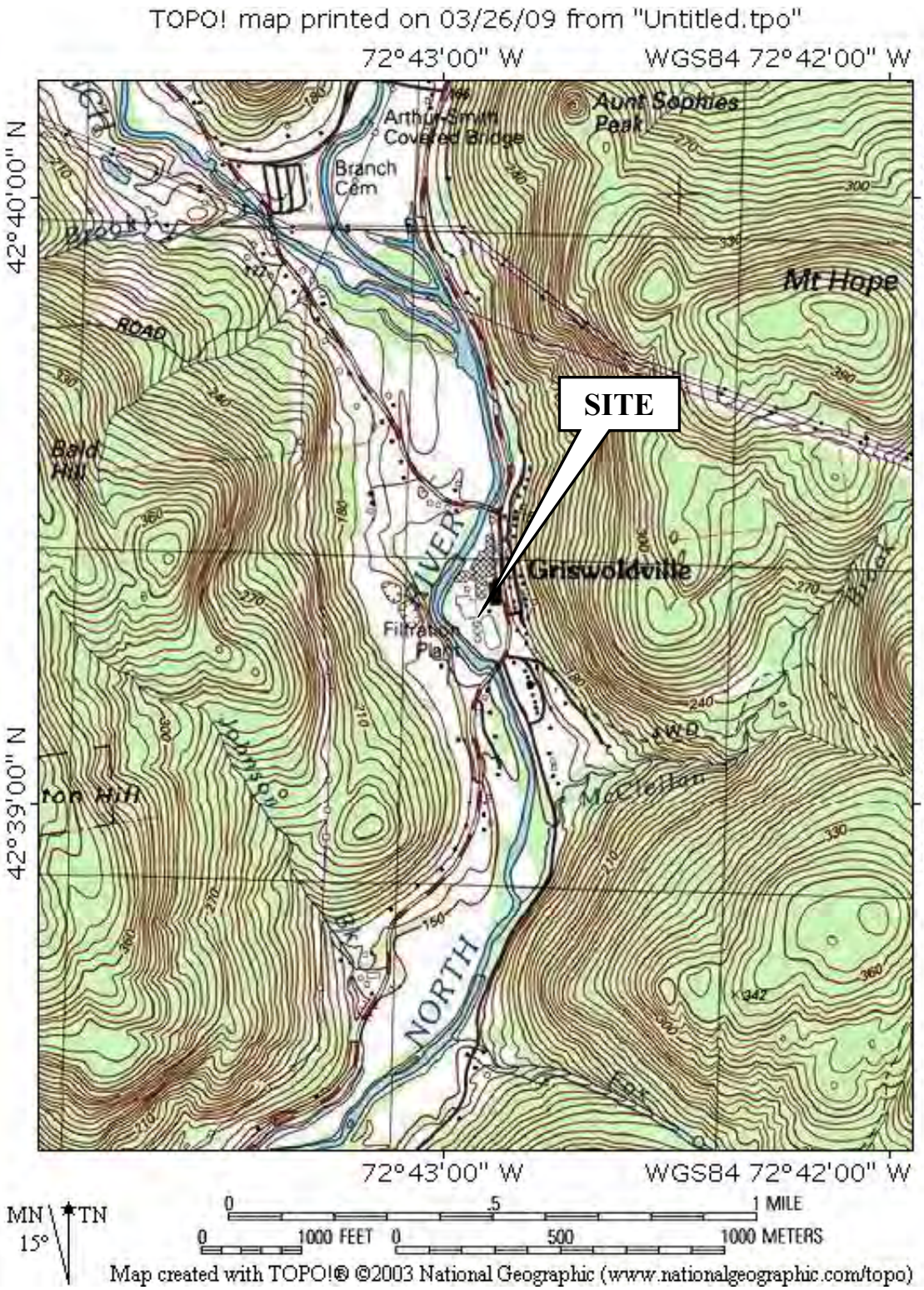
3.14 Facility Transfer Operations - 40 CRF 112.8(d)(1), (2), (3), (4) & (5)

Refer to Section 2.3 for consideration of these requirements.

4.0 SPILL HISTORY

A review of the MassDEP's Spills Databases and Disposal Sites list was conducted for this SPCC Plan to identify available records for a reportable release from the Colrain facility. The MassDEP database did not contain reportable release for the Site facility with regards to the storage or use of petroleum oils subject to this SPCC Plan.

FIGURES



OMNI ENVIRONMENTAL GROUP

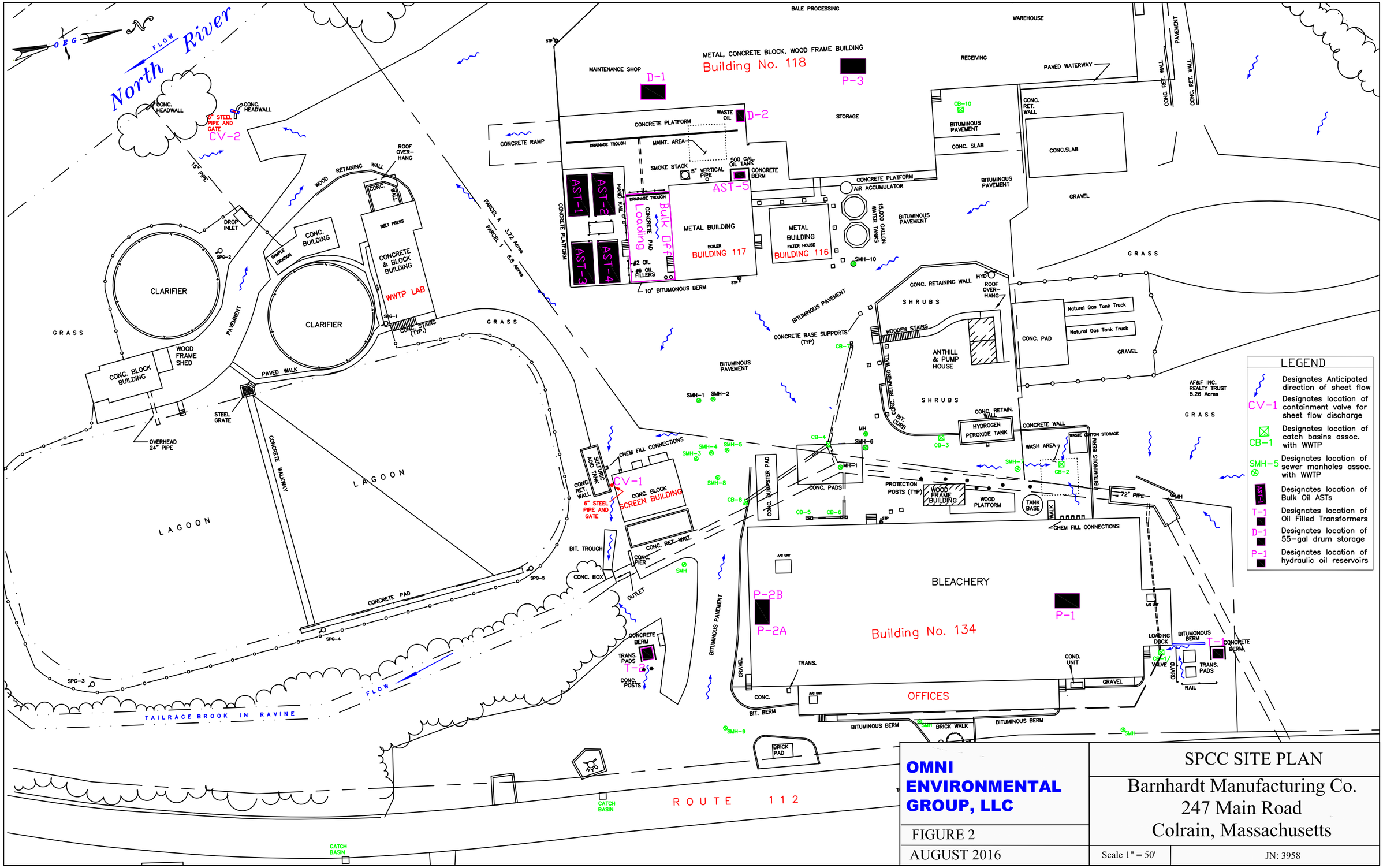
Topographic Map

Barnhardt Manufacturing Co.
247 Main Road, Colrain MA

N

FIGURE 1

3958



OMNI ENVIRONMENTAL GROUP, LLC

FIGURE 2

AUGUST 2016

SPCC SITE PLAN

Barnhardt Manufacturing Co.
247 Main Road
Colrain, Massachusetts

Scale 1" = 50'

JN: 3958

APPENDIX A

SPCC Plan Amendment Log

AUGUST 2016 SPCC Plan Amendment Log

By	Date	Activity	PE certification required?	Comment

APPENDIX B

Inspection Forms

BARNHARDT MANUFACTURING MONTHLY EXTERIOR TANK INSPECTION FORM

FACILITY NAME:	INSPECTION TIME:	DATE:

SPCC and Site Map: Have a copy of the SPCC Facility Plan during inspections to ensure they are current and accurate. Use it as an aide in recording the location of any issues you identify during the exterior AST inspection. AST-1/2/3/4 are the 20k-gal. low sulfur diesel tanks. AST-5 is the 500-gal. diesel tank. AST-6 is the 10k-gal. hydrogen peroxide tank.	YES	NO	NA	Findings and Remedial Action Documentation (Describe findings below and schedule for remedial action completion including the date initiated and date completed or expected to be completed).
Is the SPCC Facility Map current and accurate?				
Is the SPCC and SWPP exterior bulk AST inventory current?				
Is a copy of the SPCC readily available to all appropriate Site personnel?				
Exterior Bulk ASTs	**YES**	**NO**	**NA**	
Any leaks from AST-1, AST-2, AST-3, AST-4, AST-5 or AST-6? If so, describe.				
Is the ancillary piping, connections and supports from AST-1, AST-2, AST-3, AST-4, AST-5 and AST-6 in good condition with no evidence of leakage? If no, describe.				
Any staining to the impervious surfaces surrounding AST-1, AST-2, AST-3, AST-4, AST-5 and AST-6? If yes, describe.				
Is the exterior Hydrogen Peroxide AST and containment dike in good condition and free of leaks and/or spills?				
Is the bulk petroleum unloading area, trench drain, 10" containment berm and transfer connection lines/fittings in good condition with no evidence of a release?				
Is the 500-gallon tank diesel unloading area, 4" containment berm, containment valve and transfer connection lines/fittings in good condition with no evidence of a release?				
Is the containment discharge valve for the 500 gal. diesel AST closed and locked?				
Is there accumulated liquids in the 500 gal. diesel or hydrogen peroxide AST containments? If yes, which one(s)? Any evidence of oil sheen/odor? How was the liquids managed?				
Is the existing tank monitoring equipment (i.e. product level, interstitial monitoring, etc.) in good working condition? If no, please describe?				
Any alarm conditions at AST-1, AST-2, AST-3, AST-4, AST-5 or AST-6? If yes, describe.				
Are AST-1, AST-2, AST-3, AST-4, AST-5 and AST-6 properly labeld for content, volume, NFPA and GHS signage? If no, describe.				
Are the valves to AST-1, AST-2, AST-3, AST-4, AST-5 and AST-6 (excluding process feeds) properly closed and locked? If no, describe.				
Is there evidence of water accumulation in AST-1, AST-2, AST-3, AST-4, AST-5 or AST-6? If yes, describe.				
Are the safety equipment devices in place and operative for AST-1, AST-2, AST-3, AST-4, AST-5 and AST-6? If no, describe.				
Is the exterior areas around each bulk exterior AST clean and free of accumulated debris? If no, describe.				
Are the vents for each bulk exterior AST clear and operable? If no, describe.				
Are the drainage features, BMPs, and outfalls surrounding each of the exterior bulk ASTs operating effectively?				

BARNHARDT MANUFACTURING MONTHLY EXTERIOR TANK INSPECTION FORM

Are the supports, structures and foundations containing each exterior bulk AST in good condition? If no, describe.				
Is the exterior Facility lighting in the areas of the exterior bulk ASTs functioning properly?				
Are the BMC Facility Transfer and Transmission Lines for petroleum in good condition with no evidence of leaks? If no, describe.				
Is spill response equipment being maintained in easily accessible locations near potential spill areas and being incorporated into Facility SPCC training and safety meetings, per HK-24?				
Has any spills occurred since the last exterior bulk AST inspection? If yes, has the spill been documented in an incident report and reported to appropriate Facility personnel?				
Is the transfer of used oils and chemicals to storage containers being conducted within the footprint of a suitable secondary containment?				
Spill Response Equipment	**YES**	**NO**	**NA**	
Are spill kits available, in the following locations?				
Vehicle, equipment and Facility maintenance areas?				
Do the spill kits contain the following items or equivalents in volumes appropriate for the Facility location?	**YES**	**NO**	**NA**	
Personal Protection Equipment (gloves, Tyveks, eye shields, hard hat, etc.)				
Rolls, booms and pads of absorbent material				
Granular absorbent materials				
Appropriate neutralizing agent(s)				
Drain mat blockers				
Caution Tape				
55-gallon drum containers				
Drum labels				
Shovels, brooms and buckets				
Are contaminated absorbent materials properly disposed of?				

CORRECTIVE ACTION AND SPCC MODIFICATIONS DESCRIPTIONS: Additional space to describe inspection findings and corrective actions if needed. Provide brief explanation of the general location of salient observations or issues identified with exterior bulk ASTs.

Certification Statements and Signatures

Inspector - Certification: This section must be completed by the person who conducted the Facility inspection with Facility signature authority or a duly authorized representative of that person or Facility.

Check one		The facility is in compliance with the requirements of the Facility specific SPCC Plan.
		The facility is out of compliance with the the requirements of the Facility specific SPCC Plan. This report includes the actions that must be taken to meet the requirements of the requirements of the Facility specific SPCC Plan, including a schedule of implementation.

Inspector's Name (Print)	*Inspector's Signature*	*Inspector's Title*	*Date*

Monthly SPCC INSPECTION CHECKLIST
Barnhart - D-1 Storage Area (55-Gallon Drums of Hydraulic and Motor Oils)

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Is the D-1 storage area in good condition with no evidence of oil spills?	_____
_____	_____	Are the associated 55-gallon drums in good condition with no evidence of oil spills?	_____
_____	_____	Is there standing oils wihtin the spill pallet(s) of D-1?	_____
_____	_____	Is spill response equipment available and ready for use?	_____

Name: _____

Signature: _____

Date: _____

Monthly SPCC INSPECTION CHECKLIST
Barnhart - D-2 Storage Area (55-Gallon Drums of Used Hydraulic and Motor Oils)

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Is the D-2 storage container in good condition with no evidence of damage or tampering?	_____
_____	_____	Is the D-2 storage area in good condition with no evidence of oil spills?	_____
_____	_____	Are the associated 55-gallon drums in good condition with no evidence of oil spills?	_____
_____	_____	Is there standing oils wihtin the spill pallet(s) of D-2?	_____
_____	_____	Is the exterior lighting functioning properly?	_____
_____	_____	Is spill response equipment available and ready for use?	_____

Name: _____

Signature: _____

Date: _____

Monthly SPCC INSPECTION CHECKLIST
Barnhart - P-1 Hydraulic Pump Reservoir (100 Gallons of Hydraulic Oil)

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Is the area surrounding P-1 in good condition with no evidence of oil spills?	_____
_____	_____	Is the associated hydraulic oil reservoir in good condition with no evidence of oil spills?	_____
_____	_____	Is there standing oils wihtin the concrete containment structure containing P-1?	_____
_____	_____	Is spill response equipment available and ready for use?	_____

Name: _____

Signature: _____

Date: _____

Monthly SPCC INSPECTION CHECKLIST
Barnhart - P-2A/P-2B Hydraulic Pump Reservoirs (115 Gallons of Hydraulic Oil)

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Is the area surrounding P-2A/P-2B in good condition with no evidence of oil spills?	_____
_____	_____	Is the associated hydraulic oil reservoir in good condition with no evidence of oil spills?	_____
_____	_____	Is there standing oils wihtin the concrete containment structure containing P-2A/P-2B?	_____
_____	_____	Is spill response equipment available and ready for use?	_____

Name: _____

Signature: _____

Date: _____

Monthly SPCC INSPECTION CHECKLIST
Barnhart - P-3 Waste Bailer Hydraulic Pump Reservoir (100 Gallons of Hydraulic Oil)

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Is the area surrounding P-3 in good condition with no evidence of oil spills?	_____
_____	_____	Is the associated hydraulic oil reservoir in good condition with no evidence of oil spills?	_____
_____	_____	Is the concrete floor surrounding P-3 in good condition?	_____
_____	_____	Is spill response equipment available and ready for use?	_____

Name: _____

Signature: _____

Date: _____

Monthly SPCC INSPECTION CHECKLIST
Barnhart - T-1 Storage Area (750 Gallon Non-PCB Transformer Oil)

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Is the T-1 storage container in good condition with no evidence of damage or tampering?	_____
_____	_____	Is there oil staining on the concrete pad or area surrounding T-1?	_____
_____	_____	Are there any other conditions or observations indicative of a release of oil from T-1?	_____
_____	_____	Is the exterior lighting functioning properly?	_____
_____	_____	Is spill response equipment available and ready for use?	_____

Name: _____

Signature: _____

Date: _____

Monthly SPCC INSPECTION CHECKLIST
Barnhart - T-2 Storage Area (250 Gallon Non-PCB Transformer Oil)

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Is the T-2 storage container in good condition with no evidence of damage or tampering?	_____
_____	_____	Is there oil staining on the concrete pad or area surrounding T-2?	_____
_____	_____	Are there any other conditions or observations indicative of a release of oil from T-2?	_____
_____	_____	Is the exterior lighting functioning properly?	_____
_____	_____	Is spill response equipment available and ready for use?	_____

Name: _____

Signature: _____

Date: _____

MONTHLY SPCC INSPECTION CHECKLIST
Barnhart - Bulk Off-Loading Area

Yes	No	Item to Inspect	Comments and/or Actions Needed
Check One			
_____	_____	Unloading area concrete in good general function/condition?	_____
_____	_____	Signs of oil leakage into unloading area?	_____
_____	_____	Oil staining to concrete pad?	_____
_____	_____	All proper signage in place?	_____
_____	_____	Discharge valve to drainage grate fully closed?	_____
_____	_____	Water in drainage grate? - Any discharge of water?	_____
_____	_____	Oil in drainage grate?	_____
_____	_____	Spill Response Gear in adequate stock?	_____
_____	_____	Safety equipment/devices in place and operative?	_____
_____	_____	Exterior Lighting functioning properly?	_____
_____	_____	Asphalt berm at eastern (upper) end of unloading area in good condition?	_____

Name: _____

Signature: _____

Date: _____

APPENDIX C

Applicability of the Substantial Harm Criteria

Certification of the Applicability of the Substantial Harm Criteria
August 2016 SPCC Plan

Facility Name: Barnhardt Manufacturing Company
Facility Addresses: 247 Main Road
Colrain, Massachusetts.

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

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

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see *Appendix E* to this part, section 13, for availability) and the applicable Area Contingency Plan.
Yes No X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]?
Yes No X

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

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

Signature:

Name:

Title:

Date:

Notes: [1] If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form. [2] For the purposes of 40 CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

APPENDIX D

Record of Annual Discharge Prevention Briefing and Training

Record of Annual Discharge Prevention Briefings and Training August 2016 SPCC Plan

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

APPENDIX D
EMERGENCY RESPONE MANUAL

Barnhardt Manufacturing Company

EMERGENCY RESPONSE MANUAL

Revision Log

Rev. No.	Date	Effected Pages	Reason for Change
Initial	03/08/2011	All	Initial Issue
1	3/1/2016	All	Editorial page numbering, addition of Record of Revision, update of Appendix F for current employees, update of Appendix G to latest version of SPCC, addition of new sections associated with medical emergencies, fires, explosions, search & rescue, bomb threats, weather emergencies and active shooters, revision of evacuation and security sections and update of evacuation routes.
2	9/1/16	App. A & App G.	Removal of Plant Manager from Notification List and update to August 2016 version of SPCC

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Appendix F: Flood Emergency Response Plan
Appendix G: SPCC Plan

1.0 INTRODUCTION

1.1 Plan Purpose

1.1.1 Per 29 CFR, Parts 1910.120 and 1910.38, this Emergency Response Manual is written and designed to help guide the Griswoldville Plant and responding outside agencies through emergency response actions. It is recognized that this manual alone will not provide the assurance for proper handling of response actions during emergencies. However, if used properly, in conjunction with emergency response training and sound judgment, this manual will lessen the impact of emergency response actions on human life, the environment, and plant property.

1.2 Plan Administration

1.2.1 The Health, Safety and Environmental (HSE) Coordinator is responsible for the implementation and management of this Emergency Response Manual. The responsibilities include insuring that Griswoldville Plant personnel are properly trained and follow the procedures presented in this plan. Copies of the Emergency Response Manual are kept in the front offices (reception area), Maintenance Manager's office, Boiler Office, WWTP office area and in the Production Office.

1.3 Plan Amendments and Review

1.3.1 This Emergency Response Manual should be thoroughly reviewed at least annually and amended as needed.

1.4 Site Information and Description

1.4.1 The Barnhardt Manufacturing Griswoldville Plant is located in Colrain Massachusetts. The 8.3 acre plant is bordered by Route 112 to the east and the North River to the west. The plant employs 47 full time people and operates on a 24 hour a day, five, six or seven day a week basis. The major features of the facility are the cotton bleachery building (containing the manufacturing equipment and the administrative offices), the warehouse and maintenance building (containing the maintenance shop, warehousing, and the blending line process), the boiler and process water filter buildings, and the waste water treatment plant.

1.4.2 The Griswoldville Plant processes raw cotton in a kier-based scouring and bleaching operation. The final product are bales of clean, white, absorbent cotton that are shipped to customers and converted into a wide variety of products used in hospital and personnel care, as well as industrial wipes. The facility is one of the world's largest bleachers of cotton stock.

2.0 DEFINITION OF PLANT EMERGENCIES

2.1 MEDICAL EMERGENCIES

2.1.1 A plant emergency will be declared if an employee, contractor, or visitor is severely injured while either working or visiting the Griswoldville Plant. Response to a request for medical assistance for an in-plant medical emergency is to be considered top priority and supersedes all other plant activities.

2.2 FIRE AND EXPLOSIONS

2.2.1 A plant emergency will be declared if a fire or explosion requires the response of the Colrain Fire Department. Any fire or explosion resulting in a request for mutual aid is considered major.

2.3 SEARCH AND RESCUES

2.3.1 A plant emergency will be declared if an employee, contractor, or visitor is missing and/or may require extrication from equipment, high elevation, or below ground level area. The Colrain Fire Department will conduct the rescue.

2.4 CHEMICAL SPILLS

2.4.1 A plant emergency will be declared if a chemical spill is one which, due to the volume, nature, or location, has the potential for creating an environmental, safety, health, or property damage situation. A plant emergency may be declared at the discretion of the shift leader on duty at the time.

2.5 GAS (NG & Propane) RELEASES

2.5.1 A plant emergency will be declared if a storage tank, delivery truck, or piping system containing propane develops a serious leak. A plant emergency may be declared at the discretion of the shift leader on duty at the time.

2.6 BOMB THREATS

2.6.1 A plant emergency will be declared if the plant has received a bomb threat, either by phone or mail correspondence.

2.7 WEATHER EMERGENCIES

2.7.1 A plant emergency will be declared if severe weather (hurricanes, tornadoes or floods) threatens employees, contractors, visitors, and/or plant property.

2.8 ACTIVE SHOOTER

2.8.1 A plant emergency will be declared if there is an active shooter on the premises. An active shooter is defined as any person displaying violent conduct and brandishing a weapon. Weapons can include but not be limited to knife, firearm, hands and/or feet used aggressively, or any object used in a manner as to inflict injury.

3.0 RESPONDING TO AN EMERGENCY

3.1 Scope

3.1.1 This section establishes procedures for:

3.1.1.1 Assessment of an emergency condition

3.1.1.2 Management of emergency response activities

3.1.1.3 Notification of plant and off-site personnel

3.2 Assessment of an Emergency Condition

3.2.1 Initial indications of an emergency condition are via audible plant alarms, computerized alarms in the Console Room, Boiler Room, and WWTP, and/or observations by plant personnel.

3.2.2 The shift leader will direct the immediate actions of the plant on-site personnel who will verify the reported emergency. The shift leader will classify the emergency as a Level One Incident, Level Two Incident, or Level Three Incident. The shift leader will initiate the appropriate response efforts as outlined in this manual. (See Section 4.0 on incident levels.)

3.3 Management of Emergency Response Activities

3.3.1 Upon classification of a Level One Incident, the shift leader will assume the responsibilities of directing emergency response actions within his/her department. (See Section 4.0 on incident levels.)

3.3.2 Upon classification of a Level Two or Level Three Incident, the Shift Leader will provide for immediate notification of the appropriate plant personnel. Telephone numbers for the appropriate plant personnel, as well as local Fire Departments, EMT/Ambulance contractors, hazmat contractors, and government agencies are listed on the Emergency Notification List, which is located in Appendix A of this manual.

3.3.3 Documentation for every incident, Level 1, 2 or 3, shall be forwarded to the EHS Manager as soon as possible following the incident. The appropriate form for documenting an incident is located in Appendix B of this manual.

3.3.4 Any notification to government agencies should be handled by the EHS Manager. However, if the EHS Manager cannot be reached, the Shift Leader will coordinate the appropriate notifications. The procedure for notifying government agencies is described below.

3.4 Notification of Outside Agencies for Level 3 Medical Emergencies

3.4.1 If ambulance or emergency rescue is needed or there is a fatality, call 911.

3.4.2 Within eight (8) hours after the death of any employee as a result of a work-related incident, you must report the fatality to the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.

3.4.2.1 OSHA Central Telephone Number 1-800-321-6742

3.4.3 Within twenty-four (24) hours after the in-patient hospitalization of one or more employees or an employee's amputation or an employee's loss of an eye, as a result of a work-related incident, you must report the in-patient hospitalization, amputation, or loss of an eye to OSHA. (See para. 3.4.1.1)

3.4.4 In the event of a Fork Truck accident/incident which results in serious injury, death or major property damage, a report must be made within one (1) hour to the following department:

3.4.4.1 Massachusetts Department of Public Safety 1-508-820-1444

3.5 Notification of Outside Agencies for Level 2 or 3 Chemical Spills

3.5.1 In the event of a chemical "spill " which results in a release, or potential release, to the air, water, or ground of any chemical with a reportable quantity (RQ), the following assessment must be made:

3.5.1.1 Did a release to the environment occur (air, water, ground), or was the spill contained? If the spill was contained, and no release to the environment occurred, it is not necessary to report.

3.5.1.2 If a release to the environment occurred, were the substances spilled in excess of their reportable quantities? Even if a release did occur to the environment, if the volume of the spill was smaller than the reportable quantity, there is no need to report.

3.5.1.3 If a release to the environment didn't occur, BUT there is a potential that a release could turn into a release of a reportable quantity, the Mass DEP must be notified of a "Threat of a Release".

3.5.2 A "spill" includes leakage from corroded pipes or tanks which are releasing contaminants into the air, water, or ground during the previous 24 hour period. The following table shows chemicals at the Griswoldville plant and their associated reportable quantities:

Table 1 – Chemical & Petroleum Product Reportable Quantities (RQ's)

Chemical/Petroleum Product Name	RQ, lbs (MA)	RQ, gals (MA)	RQ, lbs (EPA)
Acetic Acid (Max 79% Solution)	127	14	6329
Gasoline, Diesel Fuel, Heating Oil, Motor Oil, Hydraulic Oil	N/A	10*	*
Hydrogen Peroxide (50%)	2	0.17	**
Potassium Permanganate	10	N/A	100
Sodium Bisulfite (40%)	250	23	12500
Sodium Hydroxide (50%)	100	8	2000
Sulfuric Acid	50	3	1000

3.5.2.1 * Regardless of the quantity, any petroleum product that is discharged to a waterbody as a result of a spill, and which causes a visible sheen, must be reported to the DEP and the EPA. Otherwise, EPA has not reporting requirements.

3.5.2.2 ** EPA has no reporting requirements for concentrations less than 52%

3.5.3 If a spill of a chemical has occurred to the environment and it is in excess of the reportable quantity, then the EHS Manager must be notified immediately and must in turn notify the following agencies immediately.

3.5.3.1	National Response Center (for EPA RQ's)	1-800-424-8802
3.5.3.2	Massachusetts DEP (for State RQ's)	1-888-304-1133
3.5.3.3	State Emergency Response Commission (SERC)	1-508-820-2010
3.5.3.4	Regional Emergency Planning Commission (REPC)	413-774-3167 X118

3.5.4 If a spill of a petroleum product in excess of the reportable quantity occurs, the EHS Manager must notify the following organization with two (2) hours.

3.5.4.1	Massachusetts DEP	1-413-784-1100

3.5.5 If the spill which occurs has or is likely to escape the boundaries of the plant, the following must be notified as well:

3.5.5.1	Colrain Fire Department	911
3.5.5.2	State Police	911

3.5.6 When contacting the agencies/individuals listed above, be ready to provide the following information.

3.5.6.1 The name of the caller with a phone number they can be reached at
3.5.6.2 The time and date when the spill began or was discovered
3.5.6.3 The material/chemical involved in the spill, and its quantity
3.5.6.4 Areas affected, and the environmental/safety impact
3.5.6.5 A description of where the release originated and how the release occurred
3.5.6.6 Steps taken to stop/clean-up the spill
3.5.6.7 Other agencies which have been notified

3.5.7 If a spill is from an underground storage tank (UST), the State of Massachusetts may allow the reporting of the spill within 72 hours, or it is detected by soil or water samples, reporting may be up to120 days. In both cases there are specific requirements that must be met for responding to and cleaning up the spill. Releases which fall under these categories are unlikely at the Barnhardt facility, however, these incident specific requirements should be reviewed with care at the time of the discovery of the release.

4.0 INCIDENT LEVEL CLASSIFICATION

4.1 Incident Level Overview

4.1.1 There are three incident levels, Level 1, Level 2, and Level 3. Level 1 Incidents pose the least threat to human health and safety, the environment, and plant property. Level 3 Incidents pose the greatest threat. The table below serves as a quick guide for determining incident levels for a chemical release or spill.

4.1.2 This table can be used to make a quick initial determination of an incident level involving a chemical spill, however, the detailed information contained in the remainder of this section should also be considered when determining an incident level.

Table 2 – Chemical Spill Incident Levels

Chemical Name	Level 1	Level 2	Level 3
Acetic Acid (Max 79% Solution)	<14	>14 gal	>500 gal
Gasoline, Diesel Fuel, Heating Oil, Motor Oil, Hydraulic Oil	>5 gal	>10 gal	>50 gal
Hydrogen Peroxide (50%)	<0.1 gal (1.5 c)	>0.1 gal	>100 gal
Potassium Permanganate	<10 lbs	>10 lbs	>
Sodium Bisulfite (40%)	<23 gal	>23 gal	
Sodium Hydroxide (50%)	<8 gal	>8 gal	
Sulfuric Acid	<3 gal	>3 gal	

4.1.3 Note: Any release or discharge of a chemical beyond plant boundaries or into the environment (water, ground, air) which exceeds the state reporting threshold listed above is at least a Level 2 Incident and requires notification as described in Section 3.5 of this manual.

4.2 Level 1 Incidents

4.2.1 A Level 1 Incident is the least serious and most easily handled. Employees normally working in an area should routinely be able to handle Level 1 Incidents. Evacuation of only the immediate area should be necessary, and response by persons outside the department should not be necessary. Level 1 Incidents do not require notification to hazmat contractors or government agencies.

4.2.2 Level 1 Incidents can be small spills and limited releases of hazardous materials. Containers involved in Level 1 Incidents are typically small (i.e., pails, drums, small cylinders, packages, bags, etc.). Leaks or spills should be easily stopped or contained with use of common absorbents. The

incidents are non-life-threatening, and there is minimal property and environmental impact.

4.2.3 Level 1 medical incidents require no more than first aid and do not result in any time off or restricted duty time.

4.2.4 Level 1 fires are those which can be easily handled with the use of a fire extinguisher or water spray, do not set off the sprinkler system and cause only minor material damage.

4.2.5 Level 1 cannot be used for explosions, bomb threats, weather emergencies or active shooters.

4.3 Level 2 Incidents

4.3.1 A Level 2 Incident requires expertise beyond the normal capabilities of the departmental worker. Evacuation of several departments may be necessary, and response by persons outside the department is necessary. Level 2 Incidents may require notification of hazmat contractors or government agencies.

4.3.2 Level 2 spill Incidents typically involve medium-sized containers (i.e., large totes, drums, cylinders, multiple small packages, etc.). Leaks or spills may require special equipment for containment. The incidents generally pose some threat to life, property, and the environment.

4.3.3 Level 2 medical incidents would require evaluation by a medical professional and may require restricted duty or lost time from work. The injury/incident may or may not fall under workman's comp. Person involved would still be ambulatory and would not need transportation off site.

4.3.4 Level 2 fires are those which require partial evacuation, but can still be handled by onsite personnel or equipment. They may or may not set off the sprinkler system.

4.3.5 Level 2 cannot be used for explosions, bomb threats, weather emergencies or active shooters.

4.4 Level 3 Incidents

4.4.1 A Level 3 Incident is the most serious and least easily handled. These incidents require assistance from outside emergency response agencies in addition to all the groups from the plant's emergency response organization. Widespread evacuation may be necessary. Level 3 Incidents require notification of hazmat contractors and government agencies.

4.4.2 Level 3 Incidents involve large containers (i.e., tanker trucks, bulk chemical storage tanks, multiple small packages, etc.). Leaks or spills require special equipment for containment. The incidents pose a threat to life, property, and the environment.

4.4.3 Level 3 medical emergencies would include life threatening or fatal injuries or incidents, such as loss of limbs, significant loss of blood, heart attack, stroke, or death. These incidents would require services of off-site emergency medical personnel or transport.

4.4.4 Level 3 fire emergencies require large scale evacuation, cannot be contained by on site personnel, trigger the alarm and sprinkler system, and require local fire department assistance.

4.4.5 Level 3 would include explosions, bomb threats, weather emergencies or active shooters.

5.0 MEDICAL EMERGENCY RESPONSE

5.1 General

5.1.1 All medical emergencies must be reported to the Shift Lead.

5.1.2 If a medical incident was caused by a near miss, equipment malfunction, or other safety issue, an Immediate Notification Form must be completed and submitted to the EHS Manager.

5.1.3 If the incident is a work related injury that requires transporting an associate to a medical facility, pick up an Authorization for Examination or Treatment form from the front office (on the side of the mailboxes)

5.2 Specific

5.2.1 Level 1 incident

5.2.1.1 Level 1 injuries require little or no response from anyone other than the affected party.

5.2.1.2 No notification is required to outside organizations.

5.2.2 Level 2 incident

5.2.2.1 Level 2 medical incidents should be reported immediately to the shift lead.

5.2.2.2 First aid should be applied to stop bleeding, ice applied to strains or sprains.

5.2.2.3 Scalding burns from hot liquid or steam (1st or minor 2nd degree) should be run under cold water for 10 to 20 minutes. Do NOT use ice. Burn ointment (aloe) should be applied. Cover area with clean, non-stick bandage.

5.2.2.4 If medical care is needed immediately, a Manager or Shift Lead should accompany the injured associate to the Urgent Care center in Greenfield (AEIOU at 489 Bernardston St.) or the Emergency Room at Baystate Franklin Medical Center (at 164 High St in Greenfield)

5.2.2.5 An Immediate Notification form needs to be filled out and handed in to the EHS Manager.

5.2.3 Level 3 incident

5.2.3.1 Have someone notify 911 immediately upon a Level 3 medical emergency.

5.2.3.2 Level 3 medical incidents should be reported immediately to the shift lead.

5.2.3.3 Assess the emergency to gain as much information as possible and pass the information on to the 911 operator.

5.2.3.4 First aid should be applied to stop any bleeding.

5.2.3.5 For 3rd and 4th degree burns, do NOT apply anything to the burn; just cover affected area with clean dry cloth until emergency personnel arrive.

5.2.3.6 If a person appears to be having a heart attack, do the following:

5.2.3.6.1 Have them sit or lie down and loosen any tight clothing.

5.2.3.6.2 Try to keep them calm by assuring them they'll be alright.

5.2.3.6.3 If a person is unconscious and has no pulse, CPR should be performed by trained personnel until emergency personnel arrive.

5.2.3.7 If it appears that a person has had a stroke do the following while waiting for help to arrive:

5.2.3.7.1 lie the person down with their head and shoulders raised and supported (use pillows or cushions);

5.2.3.7.2 keep them at a comfortable temperature;

5.2.3.7.3 loosen any tight clothing;

5.2.3.7.4 wipe away any secretions from the mouth;

5.2.3.7.5 make sure the airway is clear and open;

5.2.3.7.6 assure the person that help is on the way (they may be able to communicate by squeezing your hands if they can't speak) and;

5.2.3.7.7 do not give them anything to eat or drink.

5.2.3.8 In the event of 3rd or 4th degree burns

5.2.3.9 In the event of an amputation,

5.2.3.9.1 Cover and apply pressure to the area to slow down the bleeding.

5.2.3.9.2 If the limb can be retrieved, place it on ice until emergency personnel arrive.

5.2.3.9.3 Make person as comfortable as possible try to keep them calm.

5.2.3.10 Notify the Plant Manager and EHS Manager as soon as practical.

6.0 FIRES, EXPLOSIONS, SEARCH AND RESCUE

6.1 General

6.1.1 DO NOT ATTEMPT ANY RESPONSE UNLESS IT IS SAFE TO DO SO.

6.1.2 Boiler operator is responsible for contacting emergency response personnel when needed.

6.1.3 Notify Shift Lead via radio for any level of emergency

6.1.4 Report all levels of emergency to the Plant Manager and EHS Manager

6.1.5 Push e-stop to shut off power to any equipment involved.

6.2 Fires & Explosions

6.2.1 Level 1 incident

6.2.1.1 For very small explosions with no injuries or property damage, report on an Immediate Reporting Form as a near miss. If explosion causes a fire, respond as appropriate.

6.2.1.2 For incipient stage fires, use nearby fire extinguisher or water hose (if appropriate for type of fire) to put out the fire.

6.2.1.3 Use the PASS technique: Pull, Aim, Squeeze, and Sweep.

6.2.2 Level 2 incident

6.2.2.1 For explosions were there are injuries or property damage;

6.2.2.1.1 Be sure power is turned off.

6.2.2.1.2 Remove injured persons if safe to do so and treat accordingly.

6.2.2.1.3 Assess property damage and if necessary due to structural damage, evacuate area.

6.2.2.2 For level 2 fires, evacuate area of anyone not involved in fighting the fire, checking for any injuries. Treat injuries as appropriate.

6.2.2.3 Turn off any power to equipment that may be involved.

6.2.2.4 Use local fire extinguishers or water hoses (if appropriate for type of fire)

6.2.2.5 Shift lead should constantly monitor firefighting efforts to determine if fire has escalated to a Level 3 incident.

6.2.3 Level 3 incident

6.2.3.1 Shut off power to equipment in area if safe to do so.

6.2.3.2 Notify boiler operator by radio to call 911.

6.2.3.3 Leave area immediately by nearest emergency exit

6.2.3.4 Pull fire alarm on way out of building

6.2.3.5 Head to appropriate assembly area

6.2.3.6 The Designated Responsible Person for the area (Refer to Section 12) and Maintenance Manager (or Designee) should also

go to assembly area to take a head count and determine extent, location and nature of fire.

6.2.3.7 Maintenance Manager or designee shall meet emergency personnel when they arrive and, fill them in on the details and escort them to the fire location.

6.3 Search and Rescue

6.3.1 If it is determined that any associate or visitor to the facility is unaccounted for, whether during a plant emergency or during the normal course of work, the following procedure should be followed.

6.3.1.1 Using the radio, try to locate the individual.

6.3.1.2 Check with the boiler operators, and/or any other plant personnel who would have recently been in contact with the missing person for information on their whereabouts.

6.3.1.3 Check the parking lot to determine if they have left the premises.

6.3.1.4 If it is determined that they are still on the property and are missing:

6.3.1.4.1 If it is a plant emergency and an evacuation has been initiated, do not re-enter the facility. Wait until emergency responder arrive and immediately notify them that there is a person (persons) still unaccounted for.

6.3.1.4.2 If it is not an emergency situation, initiate a plant wide search by announcing it over the radio. Maintenance Manager will coordinate the effort.

6.3.1.4.3 Operators should check their areas for the individual(s) paying particular attention to low traffic and obscure areas.

6.3.1.4.4 Maintenance personnel will be utilized to search non-production areas, paying particular attention to confined spaces which appear to have been opened. (Follow confined space rules)

6.3.1.4.5 Office personnel will check their area and with Maintenance Manager for assigned area to search.

6.3.1.4.6 When the individual is found, an announcement shall be made over the radio, along with any other pertinent information on condition of missing person.

6.3.1.4.7 If a rescue is required, over and above that which can be done by plant personnel, the boiler operator will call 911 for emergency assistance.

7.0 RESPONSE TO CHEMICAL SPILLS & GAS LEAKS

7.1 **General** – Personnel handling chemical spills must wear appropriate PPE, including but not limited to appropriate foot protection, chemical goggles, (face shield if appropriate), long chemical gloves and chemical apron or jacket.

7.2 Any chemical spill directed to the waste water treatment plant requires notification to WWTP operator as soon as practical for instructions to protect plant.

7.3 Sulfuric Acid

7.3.1 Sulfuric acid (95%) is unloaded only at the facility to the west of building #132. During unloading a knife-gate valve that directs rain runoff to the tailrace is closed. A second valve leading to the wet wells in building #132 is opened. Any spill during unloading should flow into the wet wells and be contained.

7.3.2 Sulfuric acid is stored in a 4,500 gallon outside storage tank next to building #132. The tank is fully bermed to contain the entire tank contents as well as any rain or snow accumulation. Also, a 300 gallon sulfuric acid storage tank is located in the lower level of building #134. It is filled via a line from building #132 above ground which runs along the west side of building #134.

7.3.3 Potential locations of a Level three spill:

7.3.3.1 Unloading area
7.3.3.2 4,500 gallon storage tank
7.3.3.3 Transfer line to building #134
7.3.3.4 300 gallon storage tank inside building #134

7.3.4 Any spill that can be directed towards the treatment plant should be so directed, such that it will be neutralized by the normally caustic influent. The treatment plant operators will monitor and adjust acid or caustic additions to maintain NPDES required pH. Any spill into a berm should be held there until neutralized with lime or other suitable chemical. Sulfuric acid fumes are to be avoided. Exposure above 1ppm required the use of a supplied air respirator. A level <1 ppm shall confirmed before entering the area.

7.4 Hydrogen Peroxide

7.4.1 Hydrogen peroxide (50%) is only unloaded at the facility to the west of building #134. The tanker truck enters a bermed area immediately adjacent to the 9,000 gallon outside storage tank. All drains within the bermed area are connected to the wastewater treatment plant. Any spill during unloading should be contained within the bermed area and flow to the wastewater treatment plant.

7.4.2 Hydrogen peroxide is stored in the 9,000 gallon outside storage tank located on the west side of the unloading area. An underground line leads to a pump in the lower level of building #134.

7.4.3 Potential locations of a Level three spill:

7.4.3.1 Unloading area
7.4.3.2 9,000 gallon storage tank
7.4.3.3 Transfer line to building #134

7.4.4 Any spill of hydrogen peroxide can be easily handled in an open area by flushing with large amounts of water which will cause it to decompose into water and oxygen. In an enclosed area precautions are necessary since the oxygen can be a fire hazard.

7.5 Acetic Acid

7.5.1 Acetic acid (60%) is unloaded in the same area as the hydrogen peroxide. It is stored in a 2,900 gallon tank in the lower level of building #134. A floor drain adjacent to the storage tank will direct any spill to the waste water treatment plant.

7.5.2 Potential locations of a Level three spill:

7.5.2.1 Unloading area
7.5.2.2 2,900 gallon storage tank

7.5.3 Any spill should be directed to the waste water treatment plant. Acetic acid fumes are to be avoided. Levels above 15 ppm for as little as 15 minutes require air supplied respirators. Make sure levels are below 10 ppm before entering spill area.

7.6 Sodium Bisulfite

7.6.1 Sodium Bisulfite (40%) is unloaded in the same area as the hydrogen peroxide. It is stored in a 500 gallon tank in the lower level of building #134. A floor drain adjacent to the storage tank will direct any spill to the waste water treatment plant.

7.6.2 Potential locations of a Level three spill:

7.6.2.1 Unloading area
7.6.2.2 500 gallon storage tank

7.6.3 Any spill should be directed to the waste water treatment plant.

7.7 Sodium Hydroxide(Caustic)

7.7.1 Sodium hydroxide (50%) can be unloaded in the area where the sulfuric acid is unloaded, or it can be unloaded in the area where the hydrogen peroxide is unloaded. There are two storage tanks, one in building #132 is 1,000 gallons; the other in the lower level of building #134 is 13,000 gallons. Both tanks are located adjacent to floor drains which lead to the waste water treatment plant.

7.7.2 Potential locations of Level three spill:

7.7.2.1 Either unloading area
7.7.2.2 1,000 gallon storage tank
7.7.2.3 13,000 gallon storage tank

7.7.3 Direct any spill to the waste water treatment plant.

7.8 Propane

7.8.1 A propane tank storage area is located along the north wall of building #118. A shutoff valve is located on each tank. Propane is flammable and exists as a liquid under high pressure. Spills would be a gas cloud release. Slow leaks would be indicated by frost on the tank components.

7.8.2 Potential locations of a Level three spill (resulting in fire or explosion):

7.8.2.1 Tank storage area on north outside wall of Building 118.
7.8.2.2 Fork trucks operating in Buildings 118 & 119, lower bleachery, or outdoors.

7.8.3 If a leak occurs from a propane tank on equipment, immediately shut off any spark or ignition sources in the area and GET AWAY. Evacuate the immediate area and pull the main power feed to the area.

7.8.4 If a leak occurs at the outdoor storage area, ensure door to warehouse is closed. Evacuate area, including warehouse. Cut power to warehouse. Prevent truck traffic near building. Maintain evacuation until all propane fumes have cleared. There is no cleanup requirement.

7.9 Natural Gas

7.9.1 A CNG tanker storage area is located north or the Anthill. A shutoff valve is located on each tank. Propane is flammable and exists as a liquid under high pressure. Spills would be a gas cloud release. Slow leaks would be indicated by frost on the tank components.

7.9.2 Potential locations of a Level three spill (resulting in fire or explosion):

7.9.2.1 Tank storage and distribution piping area north of anthill.
7.9.2.2 NG piping from storage area to boiler

7.9.3 If a leak is detected at the storage or distribution area, immediately shut off any spark or ignition sources in the area and GET AWAY. Notify The CNG contractor/supplier IMMEDIATELY. Evacuate the immediate area and pull the main power feed to the area.

7.9.4 If a leak is detected in the boiler building, shut off the gas supply valve and shut down the boiler, Cut power to all ignition sources. Evacuate building until all propane fumes have cleared. There is no cleanup requirement.

7.10 Hydraulic Oil

7.10.1 Hydraulic oil is stored in drums in the maintenance shop of building #118 along the south wall. It is used in several devices throughout the bleachery.

Since all of the hydraulic oil is stored indoors, it is highly unlikely that stormwater runoff could be contaminated by a spill. The primary concern with any spill is it reaching the wastewater treatment plant which is not equipped to treat oil.

7.10.2 Potential locations of a Level three spill :

7.10.2.1 Baler #1 & #2 hydraulic packages, ground floor building #134
7.10.2.2 Kier cover hydraulic package, ground floor building #134
7.10.2.3 Cakemaker hydraulic package, ground floor building #134
7.10.2.4 #4 centrifuge hydraulic package, upper floor building #134
7.10.2.5 Blending line baler hydraulic package, building #133

7.10.3 Any spill must be contained immediately. If a hydraulic package is leaking, shut the system down to minimize flow. Use absorbent material to contain any liquid. If necessary, use absorbent socks to block flow from going into the drain. If there is any indication that more than 1 gallon has flowed to the drain, IMMEDIATELY notify the waste water treatment plant. Any oil to the waste water treatment plant of greater than 10 gallons requires TOTAL facility shutdown and notification of the emergency response team. If any oil is spilled into the North River, the Massachusetts DEP and the National Emergency Response Center must be notified.

8.0 RESPONSE TO BOMB THREATS

8.1 Bomb threats are to be taken very seriously and acted on immediately.

8.2 If a bomb threat is made:

8.2.1 Sound the plant evacuation alarm at the first notification of a bomb threat

8.2.2 Immediately evacuate the buildings and proceed to assembly areas.

8.2.3 Responsible persons will do a head count to ensure everyone is evacuated

8.2.4 If anyone is still in the buildings, use plant radios to try to locate them and have them evacuate. DO NOT RETURN to building to search for missing employees.

8.3 Notify the State Police immediately by dialing 911

9.0 RESPONSE TO WEATHER EMERGENCIES

9.1 Weather emergencies which could occur at the facility include hurricanes, floods, or tornadoes

9.1.1 If there is a threat of impending weather emergencies, the Plant Manager or alternately the EHS Manager, will monitor the weather to determine if a response is necessary.

9.1.2 Response to Hurricane and Flood Emergencies

9.1.2.1 If a hurricane is imminent/likely within the next 4 hours, the plant manager will initiate a controlled plant shut down and evacuation.

9.1.2.2 If a flood warning is issued by the national weather service,

9.1.2.2.1 the Plant manager or alternately, the EHS manager, will monitor the river flow at: http://waterdata.usgs.gov/ma/nwis/current/?type=flow (Deerfield River Basin, Station No. 01169000 North River at Shattuckville, MA);

9.1.2.2.2 if the river flow reaches 9,000 ft^3/sec, the FERP (Flood Emergency Response Plan, Appendix F) will be implemented.

9.1.3 Response to Tornado Warning

9.1.3.1 If there is a tornado watch for the area, the Plant Manager or alternately the EHS Manager will monitor the weather for an upgrade to tornado warning.

9.1.3.2 If the watch is upgraded to a warning, plant personnel will be notified via the plant radio system to both shut down and head to a designated area, OR to head to a designated area immediately.

9.1.3.3 Stay in the designated area until notified that the danger has past.

9.1.3.4 Designated areas are:

9.1.3.4.1 Bleachery lower level in corner near floc feeds

9.1.3.4.1.1 Alternate – bathrooms 1st floor

9.1.3.4.2 WWTP Screen Building or Lab building lower levels (Pump rooms)

9.1.3.4.3 Jamie Lesieur's office

9.1.3.4.3.1 Alternate – time clock room

9.1.3.5 After danger has past, assemble in the parking lot near the road for a head count.

9.1.3.6 Treat any injuries in accordance with the medical emergency response section.

9.1.3.7 Call 911 if outside assistance is needed for fire, gas leaks, search and rescue, injuries, etc.

10.0 RESPONSE TO ACTIVE SHOOTER

10.1 The first priority with an active shooter on the premises is the protection of our employees. Do not attempt any action that will place you or others in greater harm.

10.2 The level of incident will be determined by the type of weapon the aggressor is using.

10.2.1 Level 1

10.2.1.1 Aggressor is highly agitated and verbally attacking others or attempting physical violence without actually engaging in hand to hand combat (pushing, punching, kicking, etc.).

10.2.2 Level 2

10.2.2.1 Aggressor is highly agitated and throwing or wielding weapons of whatever is within his/her reach, i.e. throwing chairs, or tools, etc. or is physically engaging individual in hand to hand combat.

10.2.3 Level 3

10.2.3.1 Aggressor is armed with knife, firearms or carrying explosives

10.3 Respond accordingly for the level of incident.

10.3.1 Level 1 or 2

10.3.1.1 Physically separate yourself from the aggressor, call for assistance on the radio and if possible, attempt to isolate him/her from rest of facility.

10.3.1.2 Use the radio to warn other employees of the situation, without identifying the aggressor by name (unless necessary to help protect other employees).

10.3.1.3 If you cannot get away from the aggressor, attempt to overcome him/her when assistance arrives,

10.3.1.4 Have someone call the Police (911) to have person removed from the premises.

10.3.1.5 Even if person has left the facility on their own, file a report with the police when they arrive.

10.3.1.6 Notify Plant Manager and EHS Manager of incident.

10.3.2 Level 3

10.3.2.1 CALL 911 AS SOON AS POSSIBLE AND SAFE

10.3.2.2 EVACUATE

10.3.2.2.1 If there is an accessible escape path, attempt to evacuate the premises.

10.3.2.2.2 Do not attempt to retrieve your belongings. Take the shortest safe path out of range of the shooter and help others to escape.

10.3.2.2.3 Warn others not to enter area where there is an active shooter.

10.3.2.2.4 If the aggressor can see you, keep your hands visible.

10.3.2.2.5 Do not attempt to help or move wounded people within the aggressors vision

10.3.2.3 HIDE

10.3.2.3.1 If evacuation is not possible, find a place to hide where the aggressor is less likely to find you.

10.3.2.3.2 Your hiding place should:

10.3.2.3.2.1 Be out of the aggressor's view

10.3.2.3.2.2 Provide protection if shots are fired in your direction or there is an explosion

10.3.2.3.2.3 Prevent the aggressor from entering your hiding place, i.e. locked door, barricaded door.

10.3.2.3.3 Silence your cell phone or radio

10.3.2.3.4 Turn off the lights

10.3.2.3.5 Hide behind large objects

10.3.2.3.6 Remain quiet

10.3.2.4 LAST RESORT

10.3.2.4.1 Only if you cannot evacuate or hide and your life is in imminent danger, attempt to disrupt or incapacitate the aggressor by:

10.3.2.4.1.1 Acting as aggressively as possible against him/her.

10.3.2.4.1.2 Throwing items and improvising weapons

10.3.2.4.1.3 Yelling

10.3.2.4.1.4 Committing to your actions

10.3.2.5 Once the police arrive, allow them to take control.

10.3.2.5.1 Be sure they can see your hands if you are visible

10.3.2.5.2 Do not yell or appear agitated

10.3.2.5.3 If they push you to the ground, stay down until the situation is under control or they tell you otherwise.

10.3.2.5.4 Head in the direction they indicate and proceed to evacuation assembly points.

11.0 EMERGENCY RESPONSE COMMUNICATIONS ON-SITE

11.1 The Griswoldville Plant has internal communications systems capable of providing emergency instructions throughout the plant. These communications systems consist of portable radios and an internal telephone system.

11.2 The main communications link for responders during an emergency at the Griswoldville Plant is the plant's radio system. The clearing of the plant's radio channel by all persons is mandatory during emergencies. The shift leader will provide special directions or information to emergency response personnel.

11.3 It is important to remember that the plant is limited to two radio channels. All communications which can be handled by using a plant phone will be accomplished by that means. In addition to its internal communication capabilities, the plant will utilize the boiler house alarm to alert plant employees, contractors, and visitors of a pending emergency situation requiring evacuation. The boiler operator will sound the alarm continuously for a period of one minute to alert plant personnel, contractors, members of the emergency response teams, and visitors to go to their evacuation staging areas where the shift leader will provide a briefing on the emergency and protective actions to be taken.

11.4 All members of the plant emergency response organization are on call twenty-four hours a day, seven days a week. Call-out rosters have been developed and are updated periodically to ensure that all telephone numbers are current.

11.5 These systems are tested periodically to insure that all communication systems and alarms are in good operational condition.

12.0 EMERGENCY ON-SITE ALERTING AND EVACUATION

12.1 OBJECTIVE

12.1.1 The site evacuation plan serves as a tool to utilize in the event of a plant emergency and/or evacuation.

12.2 RESPONSIBILITIES

12.2.1 It is the responsibility of all Barnhardt-Griswoldville employees to be familiar with the site evacuation plan and on-site emergency alerting system. This plan shall be reviewed by all employees on an annual basis.

12.3 ON-SITE ALERTING

12.3.1 There is an emergency alarm system at the facility. The tones that may be heard are:

12.3.1.1 Pulsed tone – Indicates plant wide evacuation

12.3.1.2 Steady tone – Indicates a fire in the facility

12.3.2 On-site emergency alerting at the Griswoldville Plant is a five-step process. The process is as follows:

12.3.2.1 When a person discovers an emergency situation in an area, that person shall immediately notify the shift leader.

12.3.2.2 The shift leader then sends people to investigate the situation.

12.3.2.3 The investigators report back to the shift leader and recommend that no evacuation is necessary or that a small or full scale evacuation is indicated.

12.3.2.4 In the event of a fire, individuals can sound the fire alarm by pulling the fire boxes that are located throughout the plant.

12.3.2.5 The shift leader contacts the boiler house via the radio or phone (3703) to initiate sounding of the alarm, which indicates that evacuation and/or emergency shutdown is necessary. The alarm will sound to alert plant personnel, contractors, members of the emergency response teams, and visitors to go to appropriate staging areas and await instructions from the shift leader.

12.3.3 The shift leader will provide a briefing on the emergency, protective actions to be taken, direction of travel, the location of the on-scene Incident Response Center and, if necessary, the assembly areas to be used.

12.3.4 In addition to these procedures, the plant can provide emergency instructions throughout the plant via telephone communications and/or using plant radio systems.

12.3.5 The next section provides details of the plant evacuation plan to follow when the alert has been sounded.

12.4 EMERGENCY ON-SITE ALERTING AND EVACUATION (GENERAL)

12.4.1 In the event that employees have to evacuate an area of the plant, the order to evacuate will be given by the shift leader. Employees will be told to report to a specific safe area of the plant. When they have reported to that area, a head count will be immediately taken by their immediate shift leader.

12.4.2 The order to evacuate will be transmitted by telephone, radio, or messenger.

12.4.3 The order to evacuate must include:

12.4.3.1 Which employees should evacuate.

12.4.3.2 The location where employees must assemble.

12.4.3.3 That employees must await further orders before returning.

12.4.4 All attempts must be made to have an orderly departmental shutdown prior to evacuation.

12.4.5 All areas must be marked as to the following:

12.4.5.1 All exits must be clearly marked.

12.4.5.2 All non-exits must be clearly marked.

12.4.5.3 All areas shall post applicable site-evacuation maps and plans.

12.5 EMERGENCY ON-SITE ALERTING AND EVACUATION (SPECIFIC)

12.5.1 In the event of a disaster or other emergency, it may be necessary to evacuate personnel from the involved area(s). Individuals may become injured and unable to travel under their own power, or be unaware of the emergency at hand. To ensure no one is left behind in the affected area(s), the following individuals are assigned area responsibility, which they are to check and know that no one has been left behind. In some emergency situations, it may be necessary to enlist the services of others or the use of safety equipment from different departments, but the responsibility is still the designated individual. The shift leader may not be available for evacuation at the actual time of emergency, due to handling other responsibilities. However, it is the responsibility of the shift leader or designated individual to periodically indoctrinate the alternate in their responsibilities during emergency evacuation. The responsible person(s) for each area is outlined below.

12.5.2 BLEACHERY

12.5.2.1 Leader: Shift Leader

12.5.2.2 Alternate: Console Operator

12.5.2.3 Areas of responsibility: Each shift leader or in his/her absence, the console operator, will be responsible for

clearing the bleachery and notifying any of the people who may be working in or around the affected area.

12.5.3 ADMINISTRATIVE WING

12.5.3.1 Leader: Purchasing Coordinator

12.5.3.2 Alternate: Logistics Manager

12.5.3.3 Areas of responsibility: The purchasing coordinator or in his/her absence, the logistics manager, will be responsible for clearing the administrative wing and notifying any of the people who may be working in or around the affected area. Also responsible for visitors who have signed in.

12.5.4 WWTP

12.5.4.1 Leader: EHS Manager

12.5.4.2 Alternate: WWTP Operator

12.5.4.3 Areas of responsibility: The EHS Manager or in his/her absence, the WWTP operator, will be responsible for clearing the WWTP and notifying any of the people who may be working in or around the affected area.

12.5.5 Boiler House

12.5.5.1 Leader: Boiler Operator

12.5.5.2 Alternate: Maintenance Manager

12.5.5.3 Areas of responsibility: The boiler operator or the Maintenance Manager will be responsible for clearing the boiler house and process water filter building and notifying any of the people who may be working in or around the affected area.

12.5.6 Maintenance Area/Warehouse

12.5.6.1 Leader: Maintenance Manager

12.5.6.2 Alternate: Boiler Operator

12.5.6.3 Areas of responsibility: The Maintenance Manager or the Boiler operator will be responsible for clearing the Maintenance and Warehouse area and notifying any of the people who may be working in or around the affected area.

12.5.7 Blending Line

12.5.7.1 Leader: Blending Line Operator

12.5.7.2 Alternate: Maintenance Manager

12.5.7.3 Areas of responsibility: The blending line operator or the Maintenance Manager will be responsible for clearing the blending line area and notifying any of the people who may be working in or around the affected area.

12.6 EVACUATION ROUTES

12.6.1 Refer to Appendix C

12.7 EVACUATION TRAINING PLAN

12.7.1 Training and practice/tabletop drills shall be conducted annually. The following is an outline to conduct the annual training.

12.7.2 Cover general evacuation plan, highlighting areas of responsibility for your area personnel.

12.7.3 Cover your evacuation routes in a safety meeting. Use maps and written plans as handouts.

12.7.4 Conduct a minimum of one practice drill per crew, per year.

12.7.5 Document and record meetings and practice drills.

12.7.6 Post a copy of evacuation maps and evacuation plans in area readily visible.

13.0 EMERGENCY RESPONSE TEAMS

13.1 During any type of emergency (fire, explosion, toxic atmosphere, release of hazardous materials, personal injury, etc.), trained responders may be necessary. Response efforts to all emergencies at the Griswoldville Plant will be handled by four teams of trained individuals:

13.2 Colrain Fire Department / EMT's

13.3 Local law enforcement agencies

13.4 Griswoldville Emergency Response Team

13.5 Hazmat contractor (Clean Harbors)

13.6 Each team serves to provide specialized response efforts by trained individuals. This allows for more efficient responses and more specific training.

13.6.1 Colrain Fire Department / EMT's

13.6.1.1 The purpose of the Colrain Fire Department / EMT's is to provide emergency care to any injured/ill persons. These personnel will care for those individuals that have been removed from the hazard area. They may be required to establish a field emergency treatment center. The Shift Leader will help coordinate the transportation of injured/ill persons and will continue to work with outside agencies as they arrive to provide necessary medical treatment.

13.6.2 Local Law Enforcement Agencies

13.6.2.1 The plant relies on local law enforcement agencies for plant security due to the close proximity of plant facility and the community. Their responsibilities include:

13.6.2.2 Setting up Control Zones around the site

13.6.2.3 Support thorough communications systems

13.6.2.4 Assisting other agencies/teams as necessary

13.6.3 Griswoldville Emergency Response Team

13.6.3.1 The purpose of the Emergency Response Team is to safely bring an incipient level fire emergency under control. This team has been trained in:

13.6.3.2 Types of fires

13.6.3.3 Location and use of fire equipment

13.6.3.4 Necessary precautions for dealing with fire emergencies, as well as the chemical/release emergencies that may occur on site.

13.6.4 The members of the Griswoldville Emergency Response Team are employee volunteers comprising membership from maintenance, production, and management. During an incipient level fire emergency, these persons will be responsible for immediately responding to the scene

of the emergency. As outside agencies arrive to provide assistance, members of this team will assist these agencies. This is extremely important as outside agencies will not be as knowledgeable about the hazards and layout of the plant.

13.6.5 Hazmat Contractor

13.6.5.1 In the event that a Level 2 or Level 3 incident should occur, the Shift Leader may determine that a Hazmat Contractor is necessary for either containment, control, cleanup, or a combination of all three. The Griswoldville Plant has contracted with a local private firm to provide Hazmat services. The telephone number for the Hazmat Contractor is located on the Emergency Notification List, located in Appendix A of this manual.

13.6.5.2 In the event of an emergency that involves a fire, and the Colrain Fire Department is already on the scene and in control, the Colrain Fire Chief may decide to call upon the HazMat Team that is available to fire departments as part of mutual aid. This may be done because of the severity and/or urgency of the situation, or only as a precaution. If the Fire Chief chooses to call in a Hazmat Contractor, that team takes precedence and reports directly to the Fire Chief.

14.0 SECURITY

14.1 If an emergency warrants plant evacuation and the Plant Manager determines that it is necessary, local law enforcement agencies will be called in for assistance in securing the facility.

14.2 If necessary in order to protect the public, the Maintenance Manager will assign personnel to stand post around the perimeter until the local authorities arrive.

14.3 No person other than emergency responders will be allowed to enter upon the premises until the facility is declared safe. That includes plant personnel not involved in the emergency response as well as outside organizations or media representatives.

15.0 MEDIA CONTACTS

15.1 Media correspondents have a right to cover events, both of a catastrophic and non-catastrophic nature. Griswoldville Plant personnel will make NO COMMENTS to the media. However, those persons approached for comment must remain courteous, so as not to damage good press relations.

16.0 DECONTAMINATION

16.1 Personnel responding to hazardous substance incidents may become contaminated in a number of ways, including:

16.1.1 Contacting vapors, gases, mists, or particulates in the air

16.1.2 Being splashed by materials while sampling or opening containers

16.1.3 Walking through puddles of liquids or on contaminated soil

16.1.4 Using contaminated instruments or equipment

16.2 Protective clothing and respirators help prevent the wearer from becoming contaminated or inhaling contaminants; while good work practices help reduce contamination on protective clothing, instruments, and equipment. Even with these safeguards, contamination may occur. Harmful materials can be transferred into clean areas, exposing unprotected personnel. In removing contaminated clothing, personnel may contact contaminants on the clothing or inhale them. To prevent such occurrences, methods to reduce contamination, and decontamination procedures must be developed and established before anyone enters a site and must continue (modified when necessary) throughout site operations.

16.3 During a Level 2 or Level 3 Incident, decontamination will be setup and operated by the HazMat Contractor. They have the necessary equipment and training to implement proper decontamination.

17.0 OFF-SITE MUTUAL AID

17.1 Fire Services

17.1.1 The Griswoldville Plant will contact the Colrain Fire Department (telephone: 911), under a mutual aid agreement, for all fires (Level 1, 2, & 3). The primary duty of the Colrain Fire Department will be to provide logistic fire support and manpower.

17.1.2 It will be the responsibility of the Colrain Fire Chief to work with the Plant Emergency Response Team Leader for determining if additional fire support or equipment is is needed. Upon determination, the Colrain Fire Chief, or acting chief, will place the call(s) for additional mutual aid assistance. The Colrain Fire Chief will assume command of all responding mutual aid departments upon their arrival at the plant site. It is imperative that the Colrain Fire Chief work closely with the Plant Emergency Response Team Leader before dispatching any fire fighters or equipment into any area of the plant.

17.1.3 Fire fighters will be briefed by a Barnhardt representative on all potential hazards and necessary procedures before entry into the release area. Further, mutual aid personnel will go through the same entry/exiting procedures as are required for Barnhardt employees.

17.2 Emergency Medical Services

17.2.1 The Griswoldville Plant will contact the Colrain Fire Department EMT's (telephone: 911), under a mutual aid agreement, in the event of a Level 2 or Level 3 Incident medical emergency.

17.2.2 The primary duty of the Colrain Fire Department EMT's will be to provide emergency field care and transportation for sick or injured persons. It will be the responsibility of the Colrain Fire Department EMT's to work with the shift leader in assessing immediate care needs for any sick and/or injured persons. In addition, the senior EMT will provide, if needed, support for setting up a triage area and transportation network.

17.3 Medical Care Facility

17.3.1 In the event advanced medical care is required for any sick and/or injured person(s), the Shift Leader will contact Baystate Franklin Medical Center (telephone: 773-2263) and request mutual aid assistance or advise that they prepare to receive sick or injured persons. Franklin County Medical Center is to be given information on:

17.3.1.1 Number of injured

17.3.1.2 Types of injuries

17.3.1.3 Contamination of victims

17.3.2 The primary function of Baystate Franklin Medical Center will be to provide advanced assessment and life support for the sick and/or injured persons. Baystate Franklin Medical Center will provide these advanced life support services at their facility. However, should the need arise where the Colrain Fire Department EMT's deems it necessary for advanced life support to be provided at the disaster site, they will request that a medical team be dispatched with necessary field equipment.

18.0 EMERGENCY RESPONSE TRAINING

18.1 Responsibility

18.1.1 The Plant HSE Coordinator is responsible for administration of the plant Emergency Response/Preparedness Training program. He/she will insure that the program elements described below are implemented; that the qualifications of trainers and instructors are documented; and that records are kept of training sessions: course title, attendees, dates and times, and certifications issued.

18.2 Drills and Exercises

18.2.1 The Griswoldville Plant conducts periodic training drills or exercises to verify the emergency preparedness of participating on-site organizations and interfaces with off-site emergency assistance/response agencies. Drills and exercises are conducted to allow participants to become more familiar with their duties and responsibilities in an emergency, to verify the adequacy of methods used in emergency procedures, and to check the availability of emergency supplies and equipment.

18.2.2 The Plant HSE Coordinator is responsible for planning, scheduling, and coordination of drill-related items. Plant management may provide technical assistance from other departments to assist in scenario development and participate as drill controllers. The scheduling of drills, mini-drills, tabletop and full-scale exercises is subject to the approval of the Operations Manager.

Appendix A: Emergency Notification List

Griswoldville Plant

EMERGENCY NOTIFICATION LIST

In The Event Of A Hazardous Material Incident And/or Spill:

Call First:

Maintenance Manager	Mark Thibodeau	Ext. 3720	(Office)
		624-3232	(Home)
		K-31(Radio)	

If Unable To Contact The Above, Call Second:

EHS Manager		Ext. 3702	(Office)
		603-770-2887	(Cell)
		413-210-5979	(Home)

If Unable To Contact Second Person, Call Third:

WWTP Chief Operator	Keith Gammell JR.	Ext. 3722
		413) 625-2381 (Home)

Other Numbers You May Need:

Logistics Manager	Juanita Bousquet	Ext. 3715
		(413) 489-3117
		(413) 834-1172
Primary Spill Response Contractor	Western Mass Environmental	1-866-662-2622
Secondary Spill Response Contractor	Environmental Products & Services, Inc.	1-800-843-8265 1/800-577-4557

In the event of a reportable spill that requires official notification, contact the following:

National Response Center	1-800-424-8802
Massachusetts DEP	(413) 784-1100
State Police	(413) 625-6311
Colrain Fire Department	(413) 624-5528

Appendix B: Incident Report

(This is for reference only. Refer to Griswoldville Operator Document Number DOC-026)

CHEMICAL SPILL NOTIFICATION

Chemical Involved: _____

Date/Time Discovered: _____

Date/Time Spill Occurred: Start _____

Stop

Spill Response Tier Tier One ☐ (Refer to Emergency Response Manual)

Tier Two ☐

Tier Three ☐

Notifications:

Maintenance Manager _____

Date/Time Notified _____

WWTP Operator

Date/Time Notified _____

Description of Activities Leading to Spill, Immediate Containment and Corrective Action Taken

_____

_____

_____

_____

_____

_____

Signature: _____

Date: _____

Appendix C: Plant Site and Area Maps

Appendix D: Plant Chemical List (Tank Inventory)

Plant Chemical List & Tank Inventory By Location

Tank Name	Capacity (gal)	Location	Material of Construction
UPPER BLEACHERY			
Glycerin Tote	330	West of Dryers	Plastic Tote
Cold Water Tank	10,000	West of Kier Deck	304 SS
Soap Tank “A”	500	West of Kier Deck	304 SS
Soap Tank “B”	500	West of Kier Deck	304 SS
Soap Tank ‘C’	250	West of Kier Deck	304 SS
Soap Tank “D”	250	West of Kier Deck	304 SS
Soap Tank “E”	250	West of Kier Deck	304 SS
Setilon Mix Tank	250	Under cold water tank	304 SS
Soap Mix Tank	250	Under cold water tank	304 SS
Trial Mix Tank	Not in use	Under cold water tank	304 SS
Portable Mix Tank	55	South of Chem. Room	304 SS
LOWER BLEACHERY AREA			
Hot Water Tank	10,000	West Wall	304 SS
Acetic Acid Tank	2,800	Chem. Storage	316 SS
Caustic Tank (Sodium Hydroxide)	10,000	Chem. Storage	Carbon Steel
Dissolvine 40 Tank	2,500	Chem. Storage	304 SS
Manawet Storage Tank (East)	2,700	Chem. Storage	304 SS
Manawet Storage Tank (West)	2,700	Chem. Storage	304 SS
Sodium Bisufite Tank	2,000	Chem. Storage	304 SS
Sulfuric Acid Day Tank	300	Chem. Storage	Plastic
Wet Out Tank	4,000	Chem. Storage	304 SS
Condensate Tank	1,700	Lower Keir Deck	Steel
Heat Reclaim Tank	10,000	West of Bleachery	Carbon Steel
Hydrogen Peroxide Tank	10,000	West of Bleachery	Aluminum
Overflow Rinse Tank	10,000	West of Bleachery	304 SS
BOILER AREA			
Dearation Tank	3,500	Boiler Room	Carbon Steel
Boiler Diesel Fuel Tank	275	West of Boiler	Carbon Steel
#2 Fuel Oil Storage Tank (4)	20,000	South of Boiler	Carbon Steel
FILTER BUILDING AREA			
Yardney Filter Bed, Boiler (3)	6,000	Filter Bldg	Carbon Steel
Process Water Storage Tanks (2)	15,000	North of Filter Bldg	Stainless Steel
WWTP AREAS			
Sulfuric Acid Tank	4,500	Next to Screen Bldg.	Carbon Steel
Caustic (Sodium Hydroxide) Tank	1,000	Ground Level Screen Bldg	Carbon Steel
East Wet Well	5,000	Below Screen Bldg.	Concrete
West Wet Well	5,000	Below Screen Bldg	Concrete
Northeast Surge Tank	5,000	Below Drive Way	Concrete
Northwest Surge Tank	5,000	Below Drive Way	Concrete
Southeast Surge Tank	5,000	Below Drive Way	Concrete
Southwest Surge Tank	5,000	Below Drive Way	Concrete
Surge Tank, WWTP Filter Bldg.	Not in Use	Below WWTP Filter Bldg	Cement

South Clarifier	275,000	In WWTP area	Cement
North Clarifier	275,000	In WWTP area	Cement
South Lagoon	1,600,000	In WWTP area	Cement
North Lagoon	1,600,000	In WWTP area	Cement
Yardney Filter Bed, WWTP (6)	Not in Use	WWTP Filter Bldg.	Carbon Steel
Belt Press Wash Water Tank	1000	WWTP Chem Room	FRP
Polymer Mix Tanks (2)	1,500	WWTP Chem Room	FRP

ANTHILL

River water Storage Tank	250,000	Anthill	Cement

Appendix E: Hazardous Chemical MSDS's for Major Bulk Chemicals

Acetic Acid Solution
Dissolvine D-40
Manawet RCN 50
Liquid Sodium Bisulfite
Natural Gas
No. 2 Fuel Oil
Setilon KNL
Sodium Hydroxide 50%
Sulfuric Acid 100%

Appendix F: Flood Emergency Response Plan (FERP)

Griswoldville Flood Emergency Response Plan (FERP)

1.0 OBJECTIVE

1.1 This policy has been developed to help ensure a clear understanding of Griswoldville's commitment to employee safety and to minimize the potential loss to machinery and equipment in the event of a flood.

1.2 The one hundred and five hundred year floods will affect the WWTP, screen building, boiler house, filter building, building 118 and the first floor of the cotton bleachery.

1.3 The flood level at the Griswoldville facility will occur when the North River flow rate reaches 14,000 cubic feet per second (CFPS)

2.0 SCOPE

2.1 This policy applies to all Griswoldville employees, contractors and visitors.

3.0 RESPONSIBILITIES

3.1 It is the responsibility of the EHS Manager to monitor the Weather Channel web site (www.weather.com) and the USGS gage station for the North River web site (http://waterdata.usgs.gov) and the MA DOT Travel Information line at 413-754-5511 (or https://mass511.com) in the event that heavy rains or flooding is predicted. The EHS Manager will notify the Plant Manager that he/she is monitoring the flow.

3.2 If the EHS manager is not available to monitor the web sites and activate the Griswoldville FERP (or the Plant Manager has not been notified by the EHS manager), then the Plant Manager is responsible and should notify the Maintenance Manager.

3.3 If the Plant Manager is not available to monitor the web sites and activate the Griswoldville FERP (or the Maintenance Manager has not heard from either the EHS manager or the Plant Manager), then the Maintenance Manager is responsible.

4.0 FERP ACTIVATION

4.1 NOTE: if the monitored sources indicate that local flooding on roadways would cause a hazard to employees getting home from the facility at <u>any time</u>, the plant will be shut down and employees sent home.

4.2 The FERP will be activated by the EHS Manager when the North River flow at the USGS Gage Station reaches 9,000 CFPS.

4.3 The Plant Manager, Maintenance Manager, WWTP Operator and Boiler Operator will be notified by phone or radio.

4.4 If the flow of the North River reaches 10,000 CFPS, All company vehicles, including fork trucks and scissor lifts, will be moved to the upper parking areas.

4.5 If the flow of the North River reaches 11,000 CFPS, and time allows all computers in the affected locations will be relocated to the conference room in the main office.

4.6 If not already done so, all production in the cotton bleachery will stop and non-essential personnel will be sent home.

4.7 The boiler will be shut down.

4.8 If the flow of the North River reaches 12,000 CFPS, all pumps and motors in the affected areas will be shut down.

4.9 The Massachusetts Department of Environmental Protection will be notified via telephone (413-784-1100) that the wastewater treatment plant (WWTP) is shut down and is off line until flood waters subside.

4.10 All main service disconnect switches for the facility (at the road) will be shut off.

4.11 Any remaining personnel shall be sent home.

5.0 POST FLOODING REPAIR AND RECOVERY

5.1 Once the flow of the North River flow subsides to 10,000 CFPS, employees and contractors will be allowed to return to the affected areas to begin clean up.

5.2 Contractors who are set up as vendors and may be used to assist with repair and recovery are as follows:

W. R. Hillman Construction	(413)-624-2741
C. D. Davenport Construction	(413)-774-2080
Applied Dynamics	(413)-774-7268
Palmari Electrical	(413)-625-6356
E. W. Martin	(413)-772-0985
Western Mass Environmental	(866)-662-2622

5.3 Massachusetts Department of Environmental Protection may need to be notified if the WWTP discharged raw sewage to the North River.

5.4 All buildings shall be dewatered using sump pumps and squeegees.

5.5 Power can be restored at the direction of the Lead Electrician.

5.6 Inventory of equipment that has failed due to the storm event must be completed and reported to Factory Mutual (781)-440-8000 ext 8634.

6.0 Training

6.1 FERP training shall be conducted on an annual basis with the maintenance, WWTP and boiler employees.

7.0 Revisions

7.1 The FERP shall be reviewed on an annual basis to ensure that personnel responsibilities are current.

Appendix G: Spill Prevention Control & Countermeasures Plan (SPCC)

APPENDIX E
2015 NOI e-SUBMITTAL

2015 NPDES Multi-Sector General Permit For Stormwater Discharges Associated With Industrial Activity (MSGP) Forms

United States Environmental Protection Agency
1200 Pennsylvania Ave, NW Washington, DC 20460

Note: This is a "smart form"; as you fill out the form, additional questions willl appear that you will need to answer.

Permit Information

1. What action would you like to take? *

File a New Notice of Intent Form

Submission of this Notice of Intent (NOI) constitutes notice that the operator identified in the Facility Operator Information section of this form requests authorization to discharge pursuant to the NPDES Stormwater Multi-Sector General Permit (MSGP) permit number identified in the Permit Information section of this form. Submission of this NOI also constitutes notice that the operator identified in the Facility Operator Information section of this form meets the eligibility conditions of Part 1.1 of the MSGP for the facility identified in the Facility Information section of this form. To obtain authorization, you must submit a complete and accurate NOI form. Discharges are not authorized if your NOI is incomplete or inaccurate or if you were never eligible for permit coverage.

Operator Name (Organization Name) *

BARNHARDT MANUFACTURING

Operator Name as Noted by the NOI Preparer

2. Select the state/territory where your facility is located *

Massachusetts

3. Is your facility located on Indian Country lands? *

○ Yes ◉ No

4. Are you requesting coverage as a "federal operator" as defined in Appendix A? *

○ Yes ◉ No

5. Are you a new discharger or a new source as defined in Appendix A? * ○ Yes ◉ No

5a. Have stormwater discharges from your facility been covered previously under an NPDES permit? * ○ Yes ◉ No

6. Do you directly discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding Natural Resource Water) (See Appendix L)? Your project will be considered to discharge to a Tier 3 water if the first water of the US to which you discharge is identified by a state, tribe, or EPA as a Tier 3 water. For discharges that enter a storm sewer system prior to discharge, the first water of the US to which you discharge is the waterbody that receives the stormwater discharge from the storm sewer system. * ○ Yes ◉ No

7. Does your facility directly discharge to a Federal CERCLA site listed in Appendix P? For the purposes of this permit, a permittee discharges to a Federal CERCLA site if the discharge flows directly into the site through its own conveyance, or through a conveyance owned by others, such as a municipal separate storm sewer system. * ○ Yes ◉ No

8. Has the Stormwater Pollution Prevention Plan (SWPPP) been prepared in advance of filing this NOI, as required? * ◉ Yes ○ No

9. By indicating "Yes", I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges in Part 1.1.3. Any discharges not expressly authorized under the MSGP are not covered by the MSGP and they cannot become authorized by disclosure to EPA and/or a state via this Notice of Intent to be covered by the permit or by any other means (e.g., in the Stormwater Pollution Prevention Plan or during an inspection). If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit. * ◉ Yes ○ No

10. Master Permit Number

MAR050000

A: Facility Operator Information

1. Operator Name (Organization Name) *

BARNHARDT MANUFACTURING

2. Street *

247 MAIN ROAD

3. Supplemental Address

4. City *	5. State *	6. Zip Code *	7. Facility County or Similar Govt. Subdivision *
COLRAIN	Massachusetts	01340	Franklin

8. Phone (10-digits, No dashes) *	9. Extension	10. E-Mail *
4136243471	3702	sharon.ziemek@barnhardt.net

Operator point of contact information

11. First Name *	12. Middle Initial	13. Last Name *	14. Professional Title *
SHARON		ZIEMEK	EHS MANAGER

B: Facility Information

1. Facility Name *

BARNHARDT MANUFACTURING COMPANY

☒ Facility address same as facility operator address

2. Street/Location *

247 MAIN ROAD

3. Supplemental Address

4. City *

COLRAIN

5. State *

Massachusetts

6. Zip Code *

01340

7. Facility County or Similar Govt. Subdivision *

Franklin

Latitude/Longitude for the facility:

8. Latitude (Decimal Degrees) *

+ 42.65607

9. Longitude (Decimal Degrees) *

- 72.71442

10. Latitude/Longitude Data Source *

Map

11. Horizontal Reference Datum

WGS84

12. What is the ownership type of the facility *

Privately Owned Facility

13. Estimated area of industrial activity at your facility exposed to stormwater (to the nearest quarter acre) *

4

Identify the applicable sector and subsector of your primary industrial activity (See Appendix D) that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in the MSGP, and the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code:

15. Sector *

SECTOR V: TEXTILE MILLS, APPAREL, AND OTHER FABRIC PRODUCT MANUFACTURING; LE

16. Primary SIC Code *

2269

17. Subsector

18. Identify the applicable sectors(s) of any co-located industrial activity for which you are requesting permit coverage.

Sector

Subsector

22. Is your facility presently inactive and unstaffed? *

○ Yes ◉ No

C: Discharge Information

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *

002

B. Latitude (Decimal Degrees) *

+ 42.656080

C. Longitude (Decimal Degrees) *

- 72.715025

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

NORTH RIVER

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *

003

B. Latitude (Decimal Degrees) *

+ 42.655591

C. Longitude (Decimal Degrees) *

- 72.715084

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

○ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

NORTH RIVER

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
004	+	42.655591	-	72.715084

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

○ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

NORTH RIVER

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
005	+	42.655227	-	72.715034

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

○ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

NORTH RIVER

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
006	+	42.654610	-	72.715809

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

○ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

NORTH RIVER

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Outfalls

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID *		B. Latitude (Decimal Degrees) *		C. Longitude (Decimal Degrees) *
007	+	42.656101	-	72.715045

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

D. Substantially Identical to Any Outfalls Listed Above? *

○ Yes ◉ No

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

Outfall Section

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) *

NORTH RIVER

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? *

○ Yes ◉ No

3. Has a TMDL been completed for this receiving waterbody? *

○ Yes ◉ No

Provide the following information about your outfall latitude longitude.

5. Latitude/Longitude Data Source *: Map

6. Horizontal Reference Datum: WGS84

7. Does your facility discharge into a Municipal Separate Storm Sewer System (MS4)? *

○ Yes ◉ No

8. Do you discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) (See Appendix L)? *

○ Yes ◉ No

D: Stormwater Pollution Prevention Plan (SWPPP) Information

SWPPP Contact Information

1. First Name *: SHARON ZIEMEK

2. Middle Initial:

3. Last Name *: ZIEMEK

4. Professional Title *: EHS MANAGER

5. Phone (10-digits, No dashes) *: 4136243471

6. Extension: 3702

7. E-Mail *: sharon.ziemek@barnhardt.net

8. Your current SWPPP or certain information from your SWPPP must be made available through one of the following two options. Select one of the options and provide the required information. *

Note: You are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.

☐ Option 1: Maintain a Current Copy of your SWPPP on an Internet page (Universal Resource Locator or URL).

☒ Option 2: Provide the following information from your SWPPP.

A. Describe your onsite industrial activities exposed to stormwater (e.g., material storage; equipment fueling, maintenance, and cleaning, cutting steel beams), and potential spill and leak areas. *

Based on current Facility operations, history and controls, potential pollutants in storm water discharge are expected to be limited to:

1. Leaks from on and off road equipment, truck traffic, and employee and visitor vehicles, ——— Storm drains to outfalls #02, 03, 04, 05, 06
2. Outdoor repair or maintenance of leased material handling equipment, ——— Storm drains to WWTP
3. Potential spills from bulk loading of chemicals, ——— Storm drains to WWTP, Outfall #05
4. Minor spills from transfer of waste oil to outdoor storage container, ——— Storm drain to WWTP
5. Minor spills from addition of chemical to the WWTP lagoon or clarifiers, ——— runoff to ground infiltration or directly into lagoon
6. Minimal cotton fiber escaping from screened building exhaust vent and air filtration systems ——— Storm drains to outfall # 04
7. Outdoor cleaning of equipment ——— Storm drain to WWTP
8. Winter sanding of parking lot ——— Storm drain to WWTP, outfalls #02, 03, 04, 05, 06

B. List the pollutants(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and/or in any authorized non-stormwater discharges listed in Part 1.1.3. *

1. Petroleum products including gasoline, diesel, motor oil and hydraulic fluid
2. No discharge - drains to WWTP
3. Hydrogen peroxide, sodium hydroxide, acetic acid, sulfuric acid, and isopropanol (3% of delivered surfactant), and #2 heating oil
4. motor oil, hydraulic fluid
5. No discharge - ground infiltration or directly into WWTP lagoon
6. cotton fiber suspended solids
7. petroleum based grease or grime
8. sand as suspended solids

Allowable non-stormwater discharges:

a. Potential for emergency fire fighting activities
b. Fire hydrant flushing
c. Uncontaminated condensate from roof and wall air conditioning units and cold water pipes

C. Describe the control measures you will employ to comply with the non-numeric technology-based effluent limits required in Part 2.1.2 and Part 8, and any other measures taken to comply with the requirements in Part 2.2 Water Quality-Based Effluent Limitations (see Part 5.2.4.1). *

- All fueling and chemical loading areas are bermed and/or graded to direct any potential spills or leaks away from any storm water conveyance leading to an outfall. Outdoor tanks are either double walled or have containments which isolate spills.
- Spill kits with temporary berms and dry absorbents are located at each area where there is a potential for leaks or spills
- Leaking vehicles are kept indoors and taken out of service for repair and drip pans or dry absorbent used to contain leaking material.
- Parking lot is commercially swept in spring to remove sand used for slip control during winter
- Parking area is monitored and swept as needed to remove cotton fiber before rain events
- Trash dumpsters are either enclosed, or kept covered when not in use.
- Trash receptacles are provided for disposal of personal trash in outdoor areas.
- Regular inspections and necessary maintenance of areas, storm water conveyances and equipment that has potential for leakage are conducted as part of this SWPPP and our SPCC plan.
- Cleaning of catch basins when depth of debris reaches 2/3 of the sump depth (and a min. of 6" below lowest outlet pipe.)
- Virgin material containers and secondary containers are labeled to indicate contents and maintained closed if they contain liquid
- Drums and totes of potential pollutants are stored indoors and inspected on a regular basis
- Surfaces prone to erosion are vegetated to prevent erosion where possible or retaining walls have been built to reduce slope. Where valves and retaining walls are used, valves are located above

grouind level to allow sediment to settle rather than discharge. Where discharge would cause channeling, impervious surfacing has been used and discharge routed to weired 'catch' area.
- All employees are trained in spill control and the requirements of our SWPPP within 6 mos of hire, when there is a change tot he SWPPP, and on an annual refresher basis.

D. Provide a schedule for good housekeeping and maintenance (see Part 5.2.5.1) and a schedule for all inspections required in Part 4 (see Part 5.2.5.2). *

Annually, after the spring thaw, the paved surfaces of the facility are swept to remove excess sand from winter sanding .

Fork trucks which operate on paved surfaces are inspected and routinely maintained quarterly by an outside contractor,

At the beginning of each shift prior to operation, BMC personnel conduct equipment inspections that include equipment functionality and the identification of any leaks. These inspections are documented as part of routine checklists.

The following areas exposed to stormwater are inspected on a monthly basis as part of Barnhardt's Spill Prevention Controls and Countermeasures (SPCCC):
• Bulk Storage Tanks 1, 2, 3, 4 & 5, including aboveground piping and valves;
• Material storage areas and petroleum and chemical storage tanks located both indoors and outdoors;
• Petroleum Fuel unloading areas;
• All oil-filled transformers located at the Facility;
The following visual inspections are completed as part of this SWPPP.
• On a monthly basis, qualified BMC personnel will conduct a visual inspection that includes good housekeeping practices, outdoor equipment/piping, containment systems, spill kits and accessible storm conveyances.
• Also on a quarterly basis, qualified BMC personnel will conduct a visual assessment of storm water discharges at the six outfall locations. This will be representative of all discharges to waters of the state by the BMC stormwater conveyance system.
Note: Outfall 7 is comprised of two essentially identical outfalls at each end of a concrete wall. Monitoring shall be performed at the southern end during the 1st and 3rd quarters and at the northern end during the 2nd and 4th quarters.

The Environmental Health and Safety Manager (or his/her designee) will be responsible for conducting an annual review of SWPPP compliance inspections to evaluate the adequacy of the SWPPP and its implementation.

E: Endangered Species Protection

1. Using the instructions in Appendix E of the MSGP, under which endangered species criterion listed in Part 1.1.4.5 are you eligible for coverage under this permit? *

Criterion C – Discharges and discharge-related activities are not likely to adversely affect listed species and critical habitat

2. Provide a brief summary of the basis for the criterion selected in Appendix E (e.g., communication with U.S. Fish and Wildlife Service or National Marine Fisheries Service to determine no species in action area; implementation of controls approved by EPA and the Services). *

PER NMFS NEW ENGLAND MAP, THERE ARE NO LISTED SPECIES IN OUR ACTION AREA.
THE ENVIRONMENTAL CONSERVATION ONLINE SYSTEM LISTED TWO SPECIES, THE DWARF WEDGEMUSSEL (ALASMIDONTA HETERODON) AND THE NORTHEASTERN BULRUSH (SCIRPUS ANCISTROCHAETUS). THE DWARF WEDGEMUSSEL IS SHOWN ONLY CONSIDERABLY DOWNSTREAM OF OUR ACTION AREA, IN THE CONNECTICUT RIVER. THE NORTHEASTERN BULRUSH OCCURS AT ONE LOCATION IN THE SAME COUNTY AS OUR ACTION AREA. THAT LOCATION IS A SMALL POND ON PRIVATE LAND. OUR ACTION AREA DOES NOT INCLUDE ANY PONDS. THE 5 YEAR REVIEW OF THE SPECIES DESCRIBED THE HABITAT AS "PALUSTRINE EMERGENT WETLANDS OR VERBAL PONDS SUROUNDED BY WOODLANDS." THIS HABITAT DOES NOT MATCH THAT OF THE ACTION AREA.
THE FWS OFFICIAL SPECIES LIST INCLUDED THE NORTHERN LONG EARED BAT (MYOTIS SEPTENTRIONALIS) AND STATED THAT THERE WAS NO CRITICAL HABITAT IN OUR ACTION AREA.

a. What federally-listed species or federally-designated critical habitat are located in your "action area." *

NORTHERN LONG EARED BAT (MYOTIS SEPTENTRIONALIS) - NO CRITICAL HABITAT IN OUR ACTION AREA

b. Using the Criterion C Eligibility Form, check which of the following is applicable to your facility and answer any corresponding questions. *

☐ I submitted my completed Criterion C Eligibility Form to EPA at least 30 days prior to submitting this NOI and agree to implement any controls that were determined by EPA to be necessary to ensure that my discharges and/or discharge-related activities will have no likely adverse affects on listed species and critical habitat.

☒ I submitted my completed Criterion C Eligibility Form to EPA at least 30 days prior to submitting this NOI and have not been notified of any additional controls necessary to ensure no likely adverse affects on listed species and critical habitat.

Date your Criterion C Eligibility Form was sent to EPA (in DD/MM/YYYY format) *

03 Aug 2015

* Note: After you submit your NOI and before your NOI is authorized, EPA may notify you if any additional controls are necessary to ensure your discharges have no likely adverse affects on listed species and critical habitat.

F: Historic Preservation

1. If your facility is not located in Indian country lands, is your facility located on a property of religious or cultural significance to an Indian tribe? *

○ Yes ◉ No

2. Using the instructions in Appendix F of the MSGP, under which historic properties preservation criterion listed in Part 1.1.4.7 are you eligible for coverage under this permit *

Criterion A - No subsurface stormwater controls

Certification Information

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 gather and evaluate 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. 40 CFR 122.22(d)

When you have completed this form, click this button to submit the form for processing. You will then be provided with further instructions should you have to provide supporting documentation.

To save a partially completed form for completion at a later date from a different computer, click the 'Save to NeT' button. Clicking this button will cause you to exit the form. You can then logon to NeT with your username and password at any time to complete this transaction.

APPENDIX F
SPILL INCIDENT REPORT FORM

BARNHARDT MANUFACTURING COMPANY
BEST MANAGEMENT PRACTICE PLAN
Spill Incident Report Form

BMC employees shall complete this Spill Incident Report Form for any type of petroleum product or hazardous materials / waste spill or incident at the Facility. Keep a copy of this report with the Facility SPCC, SWPPP and/or BMP Log.

Person Reporting Spill or Incident	
Name:	Other:
Date:	
Title:	
Telephone:	
Signature:	

Type of Spill:			
Common Name of Spilled Substance:			
Estimated Quantity Spilled:			
Estimated Concentration:			
Date of Spill:			
Time Spill Started:	AM / PM	Time Spill Ended:	AM / PM

Describe the conditions and extent of the release/spill at the Facility (include the weather conditions at the time of the release/spill event):

BARNHARDT MANUFACTURING COMPANY
BEST MANAGEMENT PRACTICE PLAN
Spill Incident Report Form

Actions taken to contain spill or impact of incident:

Actions taken to clean up spill or recover from incident:

BARNHARDT MANUFACTURING COMPANY
BEST MANAGEMENT PRACTICE PLAN
Spill Incident Report Form

Actions taken to manage cleanup materials:

Actions taken to prevent recurrence:

BMC Personnel responsible for managing spill response:	
Name	Signature
Phone	Title

Spill Notification List

Provide a complete list of the person(s), companies and/or agencies notified of this release event.

Name of Agency, Entity, Company or Regulator Notified of Facility Spill Incident	Date and Time of Notification	BMC Person Providing Notification

Spill Reporting Information

Where is the spill?	
What spilled?	
How much spilled?	
How concentrated is the spilled material?	
Who spilled the material?	
Is anyone cleaning up the spill?	
Are there resource damages?	
Who is reporting the spill?	
Your contact information	
Other Salient Spill and/or Facility Information:	

APPENDIX G
MONTHLY SWPPP INSPECTION FORM

BARNHARDT MANUFACTURING SWPPP MONTHLY INSPECTION FORM

FACILITY NAME: BMC, Colrain MA Facility	INSPECTION TIME:	DATE:
NPPES PERMIT NO. - MA0003697		

WEATHER INFORMATION:

Was stormwater (e.g., runoff from rain or snowmelt) flowing at outfalls and/or discharge areas shown on the Site Map during the inspection?

Yes _____ No _____

Comments _____

_____

Note - *Facility specific weather information is recorded in WWTP Daily Logs.*

Is the inspection being conduct by an appropriate member of the SWPPP Team?

Yes _____ No _____

Date of last annual SWPPP training session:_____

SWPPP and Site Map: Have a copy of the SWPPP and site map with you during the inspection so that you can ensure they are current and accurate. Use it as an aide in recording the location of any issues you identify during the inspection. Any new potential pollutant sources must be added to the map and reflected in the *SWPPP Facility Assessment.*	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation (Describe findings below and schedule for remedial action completion including the date initiated and date completed or expected to be completed).**
Is the Site Map current and accurate?				
Is the SWPPP inventory of activities, materials and products current?				
Is a copy of the SWPPP readily available to all appropriate Site personnel?				
Spill Response Equipment	**YES**	**NO**	**NA**	
Are spill kits available, in the following locations?				
Vehicle, equipment and Facility maintenance areas?				
Do the spill kits contain the following items or equivalents in volumes appropriate for the Facility location?	**YES**	**NO**	**NA**	
Personal Protection Equipment (gloves, Tyveks, eye shields, hard hat, etc.)				
Rolls, booms and pads of absorbent material				
Granular absorbent materials				
Appropriate neutralizing agent(s)				
Drain mat blockers				
Caution Tape				
55-gallon drum containers				
Drum labels				
Shovels, brooms and buckets				
Are contaminated absorbent materials properly disposed of?				
General Material Storage Areas	**YES**	**NO**	**NA**	
Are damaged and/or Uncontainerized materials stored inside a building or in a manner that prevents discharge of impacted stormwater?				
Are materials, tools, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)?				
Are materials that are potential stormwater contaminants stored inside or under cover?				
Are all exterior drums, totes and containers stored with proper cover and containment and free of accumulated deposits and evidence of leakage?				
Are the oil-filled electrical equipment at the Facility in good condition and free of leaks, drips or spills?				
Are outdoor containers covered?				
Stormwater BMP's and Treatment Structures Stormwater BMPs and Treatment Structures: Visually inspect all stormwater BMPs and treatment structures devices, discharge areas infiltration and outfalls shown on the Site Map.	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation**
Are stormwater BMPs and treatment structures in good repair and free of debris buildup that may impair function?				
Are berms, curbing or other methods used to divert and direct discharges adequate and in good condition?				
Are Facility Catch Basins in good condition and operating properly? If not, list which catch basins and what issues.				

BARNHARDT MANUFACTURING SWPPP MONTHLY INSPECTION FORM

Areas feeding, conditions and function at Outfall 2 satisfactory?				
Areas feeding, conditions and function at Outfall 3 satisfactory?				
Areas feeding, conditions and function at Outfall 4 satisfactory?				
Areas feeding, conditions and function at Outfall 5 satisfactory?				
Areas feeding, conditions and function at Outfall 6 satisfactory?				
Areas feeding, conditions and function at Outfall 7 satisfactory? Including both ends?				
Are the containment valves for the Facility in good operable condition ready to be closed if/as needed? If no, describe.				
Are any of the containment valves closed at the time of inspection? If so, describe.				
Is the appropriate signage and/or labeling present at each catch basin indicating the discharge location? If no, describe?				
Observation of Stormwater Discharges	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation**
Is the discharge free of floating materials, visible oil sheen, discoloration, turbidity, odor, foam or any other signs of contamination?				
Illicit discharges include domestic wastewater, noncontact cooling water, or process wastewater (including leachate).	**YES**	**NO**	**NA**	
Were any illicit discharges observed during the inspection?				
Sector V Additional Inspection Requirements	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation**
Are the BMC Facility Transfer and Transmission Lines for petroleum and chemicals in good condition with no evidence of leaks?				
Are the BMPs for Minimizing Exposure, contained in Table 4 of the Facility SWPP being employed effectively? If no, describe.				
Are the BMPs for Preventative Maintenance, contained in Table 5 of the Facility SWPP being employed effectively? If no, describe.				
Good Housekeeping BMP's	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation**
Have the building foundations and integral berms been inspected and maintained, per HK-01?				
Have the secondary containment areas, piping and valves been inspected, per HK-02?				
Has stormwater from secondary containment structures been pumped out or drained within 24-hours of a storm event, per HK-03?				
Has Facility vehicles and/or equipment been inspected for leaking fluids, per HK-04? Identify leaking equipment.				
Have the Facility catch basins been maintained for removal of accumulated vegetation/debris and monitored for excess sediment accumulation (>2/3 sump depth or 6" below invert of outlet pipe), per HK-05?				
Is trash/litter from work areas collected and placed in covered dumpsters, roll offs, and/or trash compactor, per HK-06?				
Has any salt been used for ice melt at the Facility, per HK-08?				
Is all materials for snow/ice melt stored and handled in a manner to minimize potential runoff, per HK-09?				
Has the yearly spring sweeping of paved surfaces of the Facility been conducted to remove accumulated winter sanding materials and reduce sediment loading to catch basins and outfalls, per HK-10?				
Are impervious surfaces of the Facility being maintained reasonably clean through use of brooms, shovels, vacuum cleaner and other suitable equipment, per HK-11?				
Are the external cotton conveyances being maintained to prevent discharge of cotton debris to catch basins and outfalls, per HK-12?				
Is Facility fabrication/manufacturing activities being performed indoors and away from door ways, whenever possible, per HK-13?				

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Are spill buckets or equivalent being deployed beneath delivery truck(s) and building piping connection(s) to capture incidental spillage during off-loading operations, per HK-14?				
Is wash water used to clean/rinse equipment and/or areas of the Facility occurring in designated areas that drain to the WWTP, per HK-15?				
Are empty containers stored in contact with stormwater being triple rinsed in one (1) of two (2) designated maintenance/washing areas, per HK-16?				
Are all containers, drums, totes and bags being stored in areas away for direct travel routes to minimize the potential for collision-related spillage, per HK-17?				
Are all containerized materials plainly labeled and stored indoors away from drains and doorways, in designated material storage areas of the Facility, per HK-18?				
Are all storage containers labeled for contents, storage capacity, hazards, NFPA and GHS signage as appropriate, per HK-19?				
Are all storage containers stored and stacked in accordance with the manufacturers instructions to avoid damage-related spillage from improper weight distribution, per HK-20?				
Are all containers being stored on appropriate surfaces and/or devices to prevent corrosion-related spillage, per HK-21?				
Is all shipping and receiving of chemicals and petroleum products overseen by Facility personnel to prevent unobserved accident-related spillage, per HK-22?				
Are good housekeeping practices being incorporated into Facility employee training programs and safety meetings, per HK-23?				
Is spill response equipment being maintained in easily accessible locations near potential spill areas and being incorporated into Facility SPCC training and safety meetings, per HK-24?				
Has any spills occurred since the last Facility SWPP inspection? If yes, has the spill been documented in an incident report and reported to appropriate Facility personnel, per HK-25?				
Is the transfer of used oils and chemicals to storage containers being conducted within the footprint of a suitable secondary containment, per HK-26?				
Management of process waste products. Are all waste receptacles located outdoors:	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation**
In good condition?				
Not leaking contaminants?				
Closed when not being used?				
External surfaces and area free of excessive contaminant buildup?				
Are the following areas free of accumulated dust/sediment, debris, contaminants, and/or spills/leaks of fluids?	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation**
External loading dock(s), loading and off-loading areas?				
Pallet, bin, tote, container and/or drum storage area(s)?				
Maintenance Shop(s) and/or maintenance area(s)				
Equipment staging areas (loaders, tractors, trailers, forklifts, etc.)				
Around bulk storage area(s)?				
Around the WWTP?				
Around the XNG Site?				
Around Facility catch basins?				
Around Facility outfalls?				
Structural BMPs	**YES**	**NO**	**NA**	**Findings and Remedial Action Documentation**
Is the exterior Hydrogen Peroxide AST and containment dike in good condition and free of leaks and/or spills?				
Are the four (4) Bulk ASTs, bulk petroleum unloading area, trench drain, 10" containment berm and transfer connection lines/fittings in good condition with no evidence of a release?				
Is the one (1) 500-gallon AST, diesel unloading area, 4" containment berm, containment valve and transfer connection lines/fittings in good condition with no evidence of a release?				

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Is the containment discharge valve for the 500 gal. diesel AST closed and locked?				
Is there accumulated liquids in the 500 gal. diesel or hydrogen peroxide AST containments? If yes, which one(s)? Any evidence of oil sheen/odor? How was the liquids managed?				
Is the existing tank monitoring equipment (i.e. product level, interstitial monitoring, etc.) in good working condition? If no, please describe?				
Are the exterior bulk chemical unloading areas, impervious surfaces, containment valve to Outfall #5 and transfer connection lines/fittings in good condition with no evidence of a release?				
Are the three (3) condensate steam drip legs on the main steam pipe between Building No. 117 and Building No. 134 draining effectively to the WWTP?				
Is the one (1) condensate steam vent discharging from the west wall of Building No. 117 migrating across impervious surface to the trench drain of the bulk petroleum offloading area and discharging to the WWTP?				
Are the facility erosion control measures of gravel and stone to minimize erosion in unpaved and unvegetated areas in good condition and effective?				
Is the vegetation in inactive areas of the Facility in good condition and effectively minimizing erosion?				
Has suitable erosion and sedimentation (E&S) controls been employed at the Facility to minimize soil disturbance and contain sedimentation during any construction projects?				
Is Facility signage "Drains to WWTP," "Drains to River," or "Collection Basin Only" legible?				
Is there any off-Facility stormwater run-off entering the Facility? If yes, from where, and to what catch basins and/or outfalls?				

CORRECTIVE ACTION AND SWPPP MODIFICATIONS DESCRIPTIONS: Additional space to describe inspection findings and corrective actions if needed. Provide brief explanation of the general location and the rationale for the additional or different BMPs.

Certification Statements and Signatures

Inspector - Certification: This section must be completed by the person who conducted the Facility inspection with Facility signature authority or a duly authorized representative of that person or Facility.

Check one		The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.
		The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.

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

Inspector's Name (Print)	*Inspector's Signature*	*Inspector's Title*	*Date*

APPENDIX H
QUARTERLY VISUAL ASSESSMENT FORM

BARNHARDT MANUFACTURING SWPP QUARTERLYY INSPECTION FORM

Quarterly Visual Assessment - _____, 20____

Weather Conditions: _____

Each Outfall has been inspected by a member of the Pollution Prevention Team (PPT) for the following within 30 minutes of a rain event of not less than 0.1-inches or snow melt of sufficient quantity to sample (see note):

- Color
- Odor
- Clarity
- Floating Solids
- Settled Solids
- Suspended Solids
- Foam
- Oil Sheen
- Other Obvious Indicators of Pollution

Any deficiencies in these areas will be noted in the comments section, including an explanation if samples not collected within 30-minutes of rain event. Additional comments can be recorded on the back of this form.

Outfall No.	Inspected By:	Date	Time Sampled	Time Assessed	Comments
2					
3					
4					
5					
6					
7					

☐ - RAIN ☐ - SNOWMELT Rain Total _____

☐ - PHOTOGRAPHS TAKEN ☐ - OUTFALLS NOT SAMPLED DUE TO DRY/FROZEN CONDITIONS

NOTES: 1. Samples shall not be taken within 3-days of a previously measurable storm event. Samples will be taken during normal business hours.

2. Equipment needed includes rain gear, dipper pole, clean clear glass bottles, pry bar for manhole and camera.

Additional Comments

Outfall No.

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

Certification Statements and Signatures		
Inspector - Certification: This section must be completed by the person who conducted the Facility inspection with Facility signature authority or a duly authorized representative of that person or Facility.		
Check one		The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.
		The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.
"I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."		

Inspector's Name (Print)	Inspector's Signature	Inspector's Title	*Date*