Division of Environment
Curtis State Office Building
1000 SW Jackson St., Suite 400
Topeka, KS 66612-1367

Kansas
Department of Health and Environment

Phone: 785-296-1535
Fax: 785-559-4264
www.kdheks.gov

Lee A. Norman, M.D., Secretary

Laura Kelly, Governor

November 9, 2020

Duane Berning
ESE Alcohol, Inc.
310 E. Hwy 96
Leoti, KS 67861

Industrial Stormwater Permit Holders Invoice for Annual Permit Fee
December 2020 through December 2021

Dear Permittee: An Industrial Stormwater Permit is due **December 28, 2020.**

Facility Name: ESE Alcohol, Inc. (127 N. County Rd. 15-1/2)
Permit No. G-UA26-0003
Facility Location: Leoti
Please make check payable to: **KDHE**
Permit Fee: **$60.00**

Please return this form with payment to:
KDHE Stormwater Coordinator
Kansas Department of Health & Environment
1000 SW Jackson Street– Suite 420
Topeka, KS 66612-1367

TO BE COMPLETED BY PERMITTEE:

1. Has the annual comprehensive site evaluation (Permit Section 2.4.4) been completed? (Y/N) Y
2. Has the SWP2 Plan been updated and certified (Permit Section 2.4.6)? (Y/N) Y

If you answered no to either of the above questions you are required to complete the annual evaluation and/or update/modify the SWP2 Plan within 90 days of this certification date.

Rob Parsons
Signature

11.14-2020
Date

TO ENSURE PERMIT COMPLIANCE, ALL QUESTIONS MUST BE ANSWERED, AND FORM SIGNED AND SUBMITTED WITH PAYMENT.
Contact the KDHE – Stormwater Coordinator at 785.296.5517 or Chris.Seeds@ks.gov with any questions

For official use only.	Check No.	Date Received:

ESE ALCOHOL, INC.
KDHE
5195 · Licenses and fees

48983
11/17/2020
Annual Stormwater Permit Fee Dec 2020-Dec 2021
(127 N County Rd 15-1/2 Coronado)
60.00

Attachment 11 page 1 of 38

RC

ESE Alcohol, Inc. Permit #: G-UA26-0003

60.00

LMP100 M/P CHECK
Rev 3/19

104371

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ENGINEER'S CERTIFICATION

According to KDHE recommendation under the Kansas general stormwater permit, I hereby certify that my agent or I have examined the facility, and being familiar with the provisions of 40 CFR 122, attest that this SWP2 Plan has been prepared in accordance with good engineering practices and with the applicable industry standards. I further find that the Plan contains the necessary provisions for inspection and testing, and is adequate for this type of facility.

Engineer: _____
Steven Linehan, P.E.

State: Kansas

Date: 10/23/2012

STEVEN LINEHAN
LICENSED
21290
10/23/2012
KANSAS
PROFESSIONAL ENGINEER

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EXECUTIVE SUMMARY

This Stormwater Pollution Prevention Plan (SWP2) has been prepared for ESE Alcohol (hereafter referred to as "ESE Alcohol" or "facility") pursuant to the Provisions of Kansas Statues Annotated 65-164 and 65-165, and the Kansas Surface Water Quality Standards (K.A.R. 28-16-28 et seq.). Following subject headings, sections pertaining to Kansas Department of Health and Environment (KDHE) Bureau of Water National Pollutant Discharge Elimination System (NPDES) general permit will be cited with the format "2.3.4."

Regulations require plans for *Stormwater Discharges Associated with Industrial Activity*, defined in federal regulations 40 CFR 122.26(b)(14)(i)-(xi). These regulations determine which industrial facilities are potentially subject to the stormwater program requirements.

Stormwater Pollution Prevention Plan

This document addresses the requirements of the NPDES. The NPDES program requires owners of municipal separate stormwater sewer systems (MS4s) and certain industrial facilities to apply for NPDES permits. Under the general provisions of the United States Environmental Protection Agency (EPA), the NPDES permits require permit holders to develop Stormwater Pollution Prevention (SWP2) Plans. This document has an interim status pending receipt of the final permit, and meets the provisions of EPA's general permit model for multi-sector sources.

The NPDES regulations allow EPA-delegated states to issue NPDES permits. Kansas is an EPA-delegated state and serves as the permitting authority for general, group, and individual NPDES stormwater discharge permits. A copy of the NPDES permit application (Notice of Intent) for this facility is provided in **Appendix B**. KDHE has incorporated the provisions of the EPA's Multi-sector Permit for Industrial Stormwater Discharges in their permits. This permit model requires the preparation of SWP2 Plans for each permitted facility. As an ethanol producing facility, the discharge permit will likely adhere to the provisions of Sector C of EPA's Multi-sector Permit entitled *Stormwater Discharges Associated with Industrial Activity from* Other Transportation Goods Merchant Wholesale.

ESE Alcohol will maintain at least one copy of this SWP2 plan at the Facility in the Team Leader's office. While the plan is available to the EPA and KDHE personnel for on-site review, please refer any correspondence regarding the plans for the facility to the Team Leader listed herein.

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MANAGEMENT APPROVAL

The management of ESE Alcohol has approved this Plan and will commit the necessary resources as may be required for Plan implementation.

Signature: _____

Date: 11-19-12

Name: Duane Berning

Title: Owner/President

Telephone: 620-375-4519

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

ANNUAL REVIEW CERTIFICATION

In accordance with Kansas Water Pollution Control (KWPC) Storm Water Permit provisions, this SWP2 Plan will be reviewed annually. The facility will amend the SWP2 Plan, based on this review, to include additional storm water pollution prevention and control technology if:

(1) such technology will significantly reduce the likelihood of pollutants discharging to storm water, and
(2) such technology has been field-proven at the time of review.

Any amendment to the SWP2 Plan should be certified by a Professional Engineer, for all EPRCA Section 313 facilities handling Water Priority chemicals and for any NPDES facility in Kansas[i].

Planned Review Dates	Signature	Review Date
1. Year 2013	Rob Carson	11-19-2013
2. Year 2014		
3. Year 2015		
4. Year 2016		
5. Year 2017		

[i] The Kansas Department of Health and Environment highly encourages and recommends that SWP2 Plans be certified by a registered professional engineer, regardless of a facility's EPRCA status.

STORMWATER POLLUTION PREVENTION TEAM (2.4.1)

Under the NPDES regulations, stormwater runoff is potentially polluted at industrial facilities when it comes in contact with material handling equipment or activities, raw materials, intermediate products, final products, waste material, by-products, or industrial machinery [CFR 122.26(b)(14)]. Identification of locations where equipment, materials, or processes can adversely impact stormwater is ideally suited to employees working throughout the facility. The United States Environmental Protection Agency (EPA) recognizes this approach in its published guidance document for Stormwater Pollution Prevention Plans (SWP2) and Best Management Practices (BMPs) (CFR 122.2). ESE Alcohol used this rational in forming the Stormwater Pollution Prevention Team (Team) shown on **page vi**. Team responsibilities and goals include:

- Establish and review goals for the stormwater management program.
- Select and direct the implementation of BMPs.
- Establish and monitor schedules for management controls and BMPs.
- Review the physical site, operations, and SWP2 Plan to insure that management controls and the SWP2 Plan are effective and up-to-date.
- Evaluate process alternatives that promote waste minimization or remove materials from use at ESE Alcohol.

STORMWATER POLLUTION PREVENTION TEAM

TEAM LEADER

Name: Rob Carson
Title: Director of Operations
Office Phone: 620-375-4904
Emergency Phone: Ex 6
Responsibilities: Coordinate plan development and implementation, coordinate employee training, inspections and evaluations, maintain records and reports.

TEAM MEMBERS

Name: Duane Berning
Title: Owner
Office Phone: 620-375-4904
Emergency Phone: Ex 6
Responsibilities: Owner of company. Ultimately responsible for stormwater permit.

Name: Jack Riley
Title: Operations Supervisor
Office Phone: 620-375-4904
Emergency Phone: Ex 6
Responsibilities: Assist Team Leader with implementing the stormwater plan and best management practices. Routine review of best management practices.

Name: _____
Title: _____
Office Phone: _____
Emergency Phone: _____
Responsibilities:

List Prepared By: ESE Alcohol Date: 10/3/2012

--*-*

ABBREVIATION KEY

AST	Aboveground Storage Tank
UST	Underground Storage Tank
BMP	Best Management Practice
CWA	Clean Water Act
EPA	United States Environmental Protection Agency
EPCRA	Emergency Plan and Community Right-to-Know Act
KDHE	Kansas Department of Health and Environment
MS4	Municipal Separate Storm Sewer System
MSDS	Material Safety Data Sheets
NOI	Notice of Intent
NPDES	National Pollution Discharge Elimination System
PE	Registered Professional Engineer
SIC	Standard Industrial Classification
SWP2	Stormwater Pollution Prevention
Team	Pollution Prevention Team
TSS	Total Suspended Solids

1.0 INTRODUCTION – GENERAL INFORMATION

1.1 PURPOSE AND SCOPE OF THE POLLUTION PREVENTION PLAN

This document addresses the requirements of the National Pollutant Discharge Elimination System (NPDES), a tiered permitting program regulating the discharge of pollutants from point sources to waters of the United States. The NPDES program requires owners of municipal separate stormwater sewer systems (MS4s) and certain industrial facilities to apply for NPDES permits. Under the general provisions of the United States Environmental Protection Agency (EPA), the NPDES permits require permit holders to develop Stormwater Pollution Prevention (SWP2) Plans. This document has been prepared in accordance with the Kansas Water Pollution Control (KWPC) Permit issued October 12, 2011.

This SWP2 Plan provides guidance in identifying and implementing procedural and engineered components to control and prevent pollution of storm water runoff at ESE Alcohol (see Appendix A, Figure 1). ESE Alcohol has developed this SWP2 Plan based on the following core elements:

- Management Support.
- Pollution Prevention Team.
- Facility Assessment.
- Storm water Drainage Evaluation.
- Best Management Practices (BMPs).
- Continued Evaluation and Improvement.

The SWP2 Plan is a dynamic document and ESE Alcohol will revise the document if the facility expands, adds, or improves pollution prevention procedures and technologies.

1.1.1 Federal and State Regulations

According to the EPA's NPDES guidance document, the overall goal of federal and state regulations concerning storm water management is "to improve water quality by reducing the pollutants contained in storm water discharges." [1] These regulations implement sections 301 and 402 of the Clean Water Act (CWA). The final rule, published in the Federal Register, November 16, 1990, became effective December 17, 1990.

The NPDES regulations allow EPA-delegated states to issue NPDES permits. Kansas is an EPA-delegated state and serves as the permitting authority for general, group, and individual NPDES stormwater discharge permits. A copy of the Kansas Water Pollution Control (KWPC) Permit and Authorization to Discharge Under the National Pollutant Discharge Elimination System for this facility is provided in Appendix B. This permit requires the preparation of a SWP2 Plan within one year of the effective date of said permit. In addition the permittee shall certify to KDHE that a SWP2 Plan has been developed and implemented.

[1] Storm Water Management For Industrial Activities; Developing Pollution Prevention Plans and Best Management Practices, published by the EPA, Office of Water, publication EPA 832-R-92-006.

1.2 POLLUTION PREVENTION MANAGEMENT

1.2.1 Management Signature And Certification

Provisions of EPA's Multisector General Permit for Industrial Storm Water Discharges require that the SWP2 Plan, as well as other reports required by the permit, be signed by a "responsible corporate officer." A responsible corporate officer is the president, secretary, treasurer, or vice president of the corporation in charge of a principal business function.

The officer signing the SWP2 Plan and other reports under the NPDES permit must certify that the document represents accurate information. This certification, as stipulated under the standard provisions for all permits, must contain language specified in the federal regulations. A signature page for this SWP2 Plan document, containing the appropriate language, follows the SWP2 Plan's title page.

1.2.2 Professional Engineer's Certification

The KDHE indicates that a PE review is highly encouraged and recommended for the facility's SWP2 Plan. As such, a space for PE certification is provided on page ii of this document with a location for the PE's seal. The original certification is evidenced by an embossed or inked seal signed and dated by the engineer in non-black ink.

1.2.3 Storm water Pollution Prevention Team

The Stormwater Pollution Prevention Team is listed on Page vi of this document.

1.3 DOCUMENT CONTROL, PERIODIC REVIEW, AND AMENDMENT

ESE Alcohol, through the Team, will review the implemented pollution prevention procedures and controls annually to ensure that the SWP2 Plan is up-to-date. The team leader will certify that the review was completed by signing and dating the review certification page in the appropriate space. The Team will amend the SWP2 Plan when operational or procedural modifications significantly alter the potential for storm water pollution protection.

2.0 FACILITY ASSESSMENT

2.1 FACILITY OWNER AND OPERATOR

The ESE Alcohol is owned and operated by:

Company Name:	ESE Alcohol, Inc.
Address:	310 E. Hwy 96
	Leoti, KS 67861
Telephone:	620-375-4904

2.2 FACILITY CONTACTS

2.2.1 Team Leader

The following person is accountable for maintaining Best Management Practices at the facility:

Name:	Rob Carson
Title:	Director of Operations
Telephone:	Ex 6

2.3 FACILITY LOCATION AND DESCRIPTION [2.4.0, 2.4.2(a)]

The facility is located in Leoti of Wichita County, Kansas, and has two facilities:

Production Facility	**Receiving Facility**
310 E. Hwy 96	127 N. County Rd. 15½
Leoti, KS 67861	Leoti, KS 67861

The Production Facility is owned by ESE Alcohol, and the Receiving Facility is leased by ESE Alcohol from Union Pacific Railroad.

The public land survey location for the Production Facility is:

> South ½ of the SW ¼ of Section 17, Township 18 South of Range 36 West of the 6th Principal Meridian. (approx. 79.2 acres)
>
> Note: ESE Alcohol owns the entire SW ¼ of Section 17 except that reserved for the railroad right-of-way, and the western portion of land owned by a local truckline property. The railroad berm separates runoff from the respective north and south quarters.

The public land survey location for the Receiving Facility is:

> SW corner of the NW ¼ of the SE ¼ of Section 16, Township 18 South of Range 36 West of the 6th Principal Meridian.

Figure 1 of **Appendix A** shows the site location of the Production and Receiving Facilities.

Figures 3 & 4 of **Appendix A** shows the site location and drainage of the Production Facility.

Figure 5 of **Appendix A** shows the site location and drainage of the Grain Receiving Facility.

Personnel occupy and operate this facility 24 hours per day, 7 days per week.

2.3.1 Facility Operations

The facility operates under the Standard Industrial Classification System code of 286998, and listing of "All Other Basic Organic Chemical Manufacturing."

2.4 DESCRIPTION OF SITE GROUNDS AND STRUCTURES [2.4.0]

The Production Facility occupies approximately 40 acres, including production-water lagoons; however the Production Facility is contiguous with another 120 acres to the east, which is used as farmland. The Grain Receiving Facility utilizes approximately 2.6 acres and is leased from Union Pacific Railroad.

Area 1: Production Facility
Site Description: This area is comprised of approximately 40 acres. Runoff flow from this area is generally to the northeast into a drainage swale along the southeast berms of Settling Basins #5 and #6. Generally, runoff from the site does not flow past the drainage swale (i.e. ponding occurs with large rain events). Potential source contaminants in this area include: product storage (steel tanks), equipment storage, product transfer (ethanol and grain), and denaturant storage (steel tanks).

Material Inventory
Ethanol, grain, denaturant tanks, product tanks, pallets, buckets, drums, and miscellaneous equipment (hoses, pipes, valves, sheet metal, trailers, etc.)

Area 2: Receiving Facility
Site Description: This area is comprised of approximately 2.6 acres. Runoff flow from this area is generally to the east along the Union Pacific Railroad. ESE operations at this location include shipping, storing, and receiving of raw corn product. ESE often stores loaded and unloaded totes outside. Empty pallets are also stored outside. Corn is unloaded from its container inside the building and conveyed out to trucks for transferring to the Production Facility. Potential source contaminants in this area include: raw product storage and materials handling (particularly shipping and transference of bulk, unpackaged grain).

Material Inventory
Grain, Corn, Plastic totes, wooden pallets

2.5 POTENTIAL SOURCES OF STORMWATER POLLUTANTS (2.4.2)

Materials having the potential to impart pollutants to stormwater are listed in **Appendix C** on Worksheet #3A and entitled *Description of Exposed Significant Materials*. In the case of ESE Alcohol, equipment, pallets, totes, and storage tanks have been exposed in the three years preceding initial implementation of this Plan. All other materials are either stored in enclosed bins or located inside a building. The EPA fact sheet identified material handling and storage, vehicle fueling and maintenance, waste treatment and disposal, manufacturing process components, and other miscellaneous activities as activities creating potential pollutants. The pollutants identified by the EPA for Chemical and Allied Products Manufacturing and Refining include total suspended solids (TSS), total dissolved solids (TDS), oils and grease, gasoline, and ethanol. These materials are principally associated with either outdoor material loading/unloading or outdoor material and equipment storage.

2.6 PAST SPILLS AND LEAKS

The facility has not had any significant spills or leaks within the past 3 years. Any future spills or leaks will be documented in **Appendix G**.

2.7 STORMWATER MONITORING DATA

Stormwater shall be visually inspected at least once per year. ESE Alcohol shall perform and document a visual examination of the stormwater discharge at the site sample locations. Stormwater discharge inspection shall be performed within 30 minutes of a discharge event. A discharge event is an event that causes runoff from the site (approximately 1.3 to 1.8 inches of rain for this location).

2.8 NON-STORMWATER DISCHARGES (1.2)

In accordance with provisions of the general multi-sector permit, most non-stormwater discharges must be eliminated or covered by a separate permit. The facility's management must certify that non-stormwater discharges have been eliminated. A form containing this certification is provided in **Appendix D** and must be completed and kept with the SWP2 Plan after receiving the permit. The following non-stormwater discharges may be authorized under the general multi-sector permit:

- Fire fighting activities.
- Fire hydrant flushings.
- Uncontaminated potable water sources, including waterline flushings.
- Uncontaminated compressor condensate.
- Irrigation drainage.
- Lawn watering.
- Routine external building washdown that does not use detergents or other compounds.
- Pavement wash waters (limited as provided for in the permit).
- Air conditioning condensate.
- Uncontaminated springs and/or groundwater.
- Foundation or footing drains where flows are not contaminated with process materials.

Appendix D provides the facility's certification regarding non-stormwater discharges from this facility. The following sections describe the non-stormwater discharges for this facility as of the date of this Plan.

Area 1: Uncontaminated compressor condensate, irrigation drainage, and air conditioning condensate.

Area 2: None

ESE Alcohol also has eight (8) permitted process water lagoons located at the main facility. The lagoons are non-discharging, and permitted under a separate NPDES permit.

The Leoti, Kansas area has the potential to receive 4.32 inches of rain based on a 25-year return period and 24-hour event ("Rainfall Intensity Tables for Kansas Counties" developed by Bruce M. McEnroe of the University of Kansas) (National Weather Service maps from publications HYDRO-35 and TP-40).

*_*_*_*

3.0 MEASURES AND CONTROLS (2.4.3)

3.1 BASELINE BEST MANAGEMENT PRACTICES

The structural devices and nonstructural practices employed by ESE Alcohol to prevent or control pollutants from entering stormwater are discussed in this section. The EPA refers to the devices and practices as "best management practices" or BMPs. BMPs are any program, technology, process, citing criteria, operating method, measure or device that controls, prevents, removes or reduces pollution. The EPA categorizes BMPs as "baseline" and "advanced." Baseline BMPs are generally applicable to all industries, regardless of manufacturing process or products. Advanced or activity-specific BMPs are applicable to a particular industry or facility, based solely on the manufacturing process or the site's characteristics.

Each category of BMPs is broken down into "source controls" and "treatment controls." Generally, source control BMPs focus on material usage, storage, recycling, and disposal practices, as well as spill control and spill response practices. Source control BMPs also can be activity based and vary from one type of activity to another.

Treatment control BMPs incorporate technology to treat stormwater, removing pollutants prior to being discharged. Treatment control BMPs are generally engineered devices such as oil/water separators, infiltration systems, and detention and filter systems. ESE Alcohol generally only uses source control BMPs to prevent pollutants from impacting stormwater, as described in the following sections.

3.1.1 Good Housekeeping

Purpose: To maintain a clean and orderly work environment for areas that may contribute pollutants to stormwater. Good housekeeping is a form of source control. By maintaining the work environment in a clean and orderly manner, contributions of pollutants to stormwater discharges are reduced.

Established Practices:

- Grain conveyance systems are covered to help address fugitive dust,
- All processing activities are located inside,
- Loading hoses are placed back into the secondary containment after each use,
- Secondary containment water is inspected prior to discharging.

Practices to Be Evaluated: ESE Alcohol will evaluate the following practices for potential implementation in the future:

- Place as much raw product (corn) inside if/when possible,
- Avoid loading/unloading activities in the rain if possible,
- Cover exterior materials if possible.

3.1.2 Preventive Maintenance

Purpose: To provide a preventive maintenance program consisting of timely inspection and maintenance of stormwater management devices; inspection and testing of equipment used in the control of significant materials; and proper maintenance of equipment. Preventive maintenance includes checking equipment for proper fluid levels, operation standards and calibration, and use of safety devices.

Established Practices:

- Maintain records and calibration for product levels,
- Inspect and maintain stormwater swale,
- Inspect and maintain storage tanks, valves, and venting,
- Inspect and maintain covers on grain conveyor,

- A large, mobile spill kit is maintained on-site at all times,

3.1.3 Spill Prevention and Response

Purpose: One of the largest sources of storm water pollution related to industrial activities are spills and leaks. Successful prevention involves identification of areas where spills can occur, use of appropriate material handling procedures, and storage requirements.

Established Practices: Contingency Plan
ESE Alcohol implements practices for recognizing and reacting to catastrophic events. Facility document titled "Contingency Plans and Emergency Procedures includes the following:

- Emergency procedures in the event of a fire, explosion, chemical or fuel release,
- Personnel and notifications, and
- Site containment structures

3.1.4 Visual Inspections

Purpose: Visual inspections, conducted by qualified facility personnel, are an important means to identify leaking or malfunctioning equipment. Visual inspections, performed at appropriate intervals determined by facility personnel, are documented. Records are maintained until one year after permit coverage expires.

Established Practices:

- The facility routinely inspects tanks, piping, and valves for damage or deterioration,
- The facility uses standardized forms and checklists for inspections

3.1.5 Employee Training

Purpose: Employee training programs must inform personnel at all levels of responsibility of the components and goals of the SWP2 Plan.

Established Practices: ESE Alcohol trains employees, as needed, on handling of hazardous and non-hazardous material, spill containment, and disposal. ESE Alcohol employees are knowledgeable of good housekeeping procedures as well as spill response.

Practices to be Considered: ESE Alcohol should provide employees with an overview of this Plan, describing best management practices to reduce stormwater contamination.

3.1.6 Recordkeeping and Internal Reporting

Purpose: Written records provide an important tool in identifying physical locations or processes that affect the potential for storm water pollution. Under the permit, records for spills and other discharges, as well as information concerning inspections and storm water discharge quantities are maintained as part of the SWP2 Plan for at least three years after the date of inspection.

Established Practices: Records are maintained on-site for the various inspections, spill events, and maintenance activities.

Future Practices: Records and internal reporting shall be maintained by one or two people, preferably the person(s) in charge of regulatory compliance.

3.1.7 Sediment and Erosion Control

Purpose: Areas having a high potential for soil erosion due to topography and/or soil type are to be identified and stabilized to decrease sediment loading of stormwater.

Practices in Place:

- Roadways are graveled to alleviate possible erosion.
- The facility sites are rocked with 1-1/2 inch stone to reduce concentrated water paths which would otherwise contribute to erosion and TSS,
- Stormwater is directed into a swale which retains water,
- The topography of both Area 1 and Area 2 is very flat, which further reduces the erosion potential.

*_*_*_*

4.0 ANNUAL COMPLIANCE EVALUATION AND MONITORING

4.1 ANNUAL COMPLIANCE EVALUATION [2.4.4]

In accordance with the multi-sector permit provisions, ESE Alcohol will conduct an annual compliance evaluation. The purpose of this evaluation is two-fold. First, the evaluation will confirm that the provisions of the SWP2 Plan are in place and functioning. Secondly, through an annual inspection and records review, the SWP2 Plan can be amended as needed and additional BMPs can be established, if necessary.

4.1.1 Quarterly Inspection (2.4.3(d))

Trained personnel shall perform routine (at least quarterly) inspections of facility processes. Inspections include examination of raw material, finished product, chemicals, waste streams, equipment, paint, product handling, etc. A set of tracking or follow-up procedures will be taken to correct any deficiencies. The inspection report shall include completion dates for correction of all deficiencies. Records of inspections shall be maintained onsite or in a readily accessible location for at least three years after the inspection date.

4.1.2 Annual Inspection (2.4.4)

The annual inspection should note any modifications to physical structures or changes in operating practices that materially affect the potential for the discharge of pollution with stormwater. At a minimum, the inspection will account for the following:

- Storage Tanks
- Equipment Storage Areas
- Drainage Systems Check (check for sediment pathways, waste in swale, etc.)
- Drainage Controls (curbs and containment structures)

Each of the features or areas above will be visually inspected for the evidence of, or the potential for, pollutants entering the drainage system. Existing control measures to reduce pollutant loading will be evaluated for adequacy and proper implementation. The facility's structural stormwater management system (i.e., sediment and erosion controls) will be observed for proper operation. All other features implemented by this plan will be included in this inspection.

The same person or team of people will conduct the annual inspection to promote continuity. Whenever possible, at least one of the individuals will be a member of the Pollution Prevention Team.

4.1.3 Review of Records (2.4.5)

The inspection team will review the available records identified in the SWP2 Plan for completeness and ensure they are up-to-date. Applicable records include:

- Periodic inspection records.
- Spill reports and records.
- Stormwater Monitoring Reports.
- Evaluation reports for implementing BMPs.
- Past Report of Findings from annual inspections.

The review of records will be coordinated by the same people responsible for conducting the annual inspection.

4.1.4 Report of Findings

The persons conducting the inspection will prepare a report of findings. The report will contain:

- Name of the inspectors.
- Date(s) of the inspection.
- Summary of major observations made regarding implementation of the SWP2 Plan.
- Recommendations for actions to be taken to improve pollution prevention.
- Copies of the checklists completed during the inspection.
- Signed compliance certification.

All reports of findings will remain on file for one year past the permit period. Reports of Findings will be maintained in **Appendix G** of the official copy of the SWP2 Plan.

4.1.5 Plan Update and Modification (2.4.6)

The Plan shall be modified in a timely manner, but in no case more than 90 days after:

- change in design, construction, operation or maintenance that has a significant effect on the potential for the discharge of pollutants to the waters of the State, or

- the KDHE, EPA, or permittee's inspections (including the regular comprehensive site compliance evaluation required herein) indicate deficiencies in the Plan or any BMP; or

- a visual inspection of contributing areas or a visual inspection of the stormwater discharges or monitoring of the stormwater discharges indicate the plan appears to be ineffective in eliminating or significantly minimizing pollutants from sources identified in the Plan.

4.1.6 Date Plan Completed/Modified (2.4.7)

The Plan shall include a statement indicating the date the plan was completed and implemented and the date(s) of subsequent modifications to the Plan.

4.2 STORMWATER MONITORING [2.4.5]

The existing multi-sector permit provisions do not require analytical monitoring for All Other Basic Organic Chemical Manufacturing. This Plan will be revised if stormwater monitoring is required in the future and any required monitoring reports will be placed in **Appendix G.** However, the facility must conduct routine (no less than once per year) visual examinations of stormwater quality, as discussed below. ESE does not have a true stormwater outfall at the Production Facility as no stormwater leaves the property; however visual examinations will be performed at the location shown as "Sample 1 – Drainage Swale" in Appendix A. A similar visual examination will be performed at the location shown as "Sample 2 –Ditch" in Appendix A.

4.2.1 Visual Examinations

The EPA permit model and fact sheet stipulate that Industrial Organic Chemicals facilities must perform and document a visual examination of stormwater discharge for each outfall associated with industrial activity. The KDHE requires this to be done at least once per year. This stipulation is presented in 2.4.5 Inspections. Specifically, the facility must:

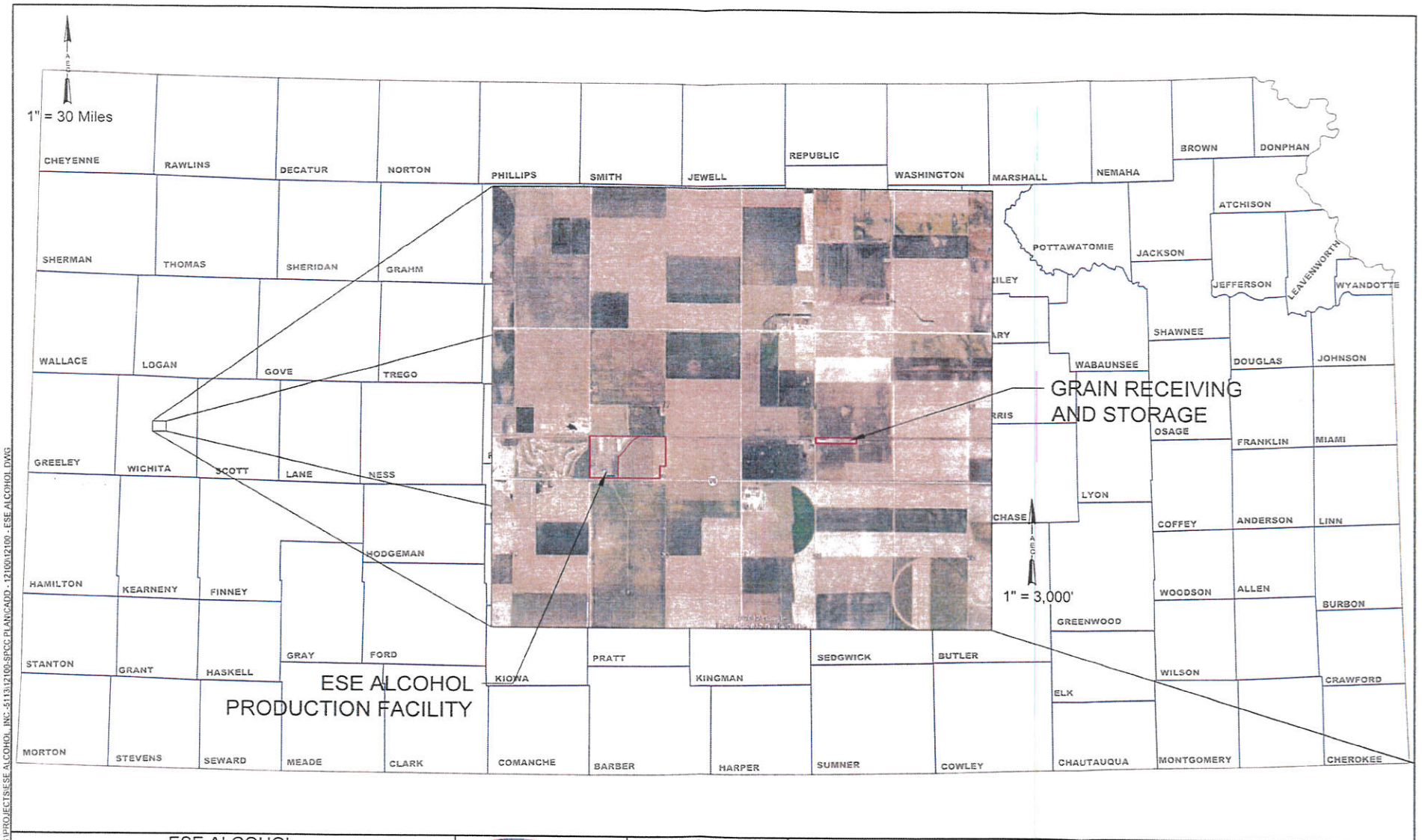
1. Inspect each outfall associated with industrial activity at least once each 12-month period during daylight hours and immediately following or during a runoff event (see Permit).

2. Collect a sample in a clear, clean container (if possible) at the location of the drainage swale at the main facility, and collect a similar sample at the northeast ditch at the grain receiving facility (see Fig. 3 in Appendix A for sampling locations. It may be necessary to utilize a pole or similar device to capture the sample. Do not unnecessarily agitate the water by wading into the ponded areas.
3. Visually observe the sample for color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution.
4. Examination must be performed in a well-lit location and based on a storm event producing greater than 0.1-inch of rainfall. The same individual should conduct the examination each event to enhance consistency in the results and recordkeeping.
5. Prepare and file a visual examination report with the SWP2 Plan. The report is to include the date, time, examination person, the nature of the discharge (i.e., runoff or snow melt), the visual quality of the discharge (as enumerated in Item 3), and the probable source of any identified contaminant.
6. The Permit provides for examination from representative outfalls where a facility has two or more outfalls, as indicated in section 5.c.4.

*_*_*_*

APPENDIX A

SITE PLANS
AND
FIGURES



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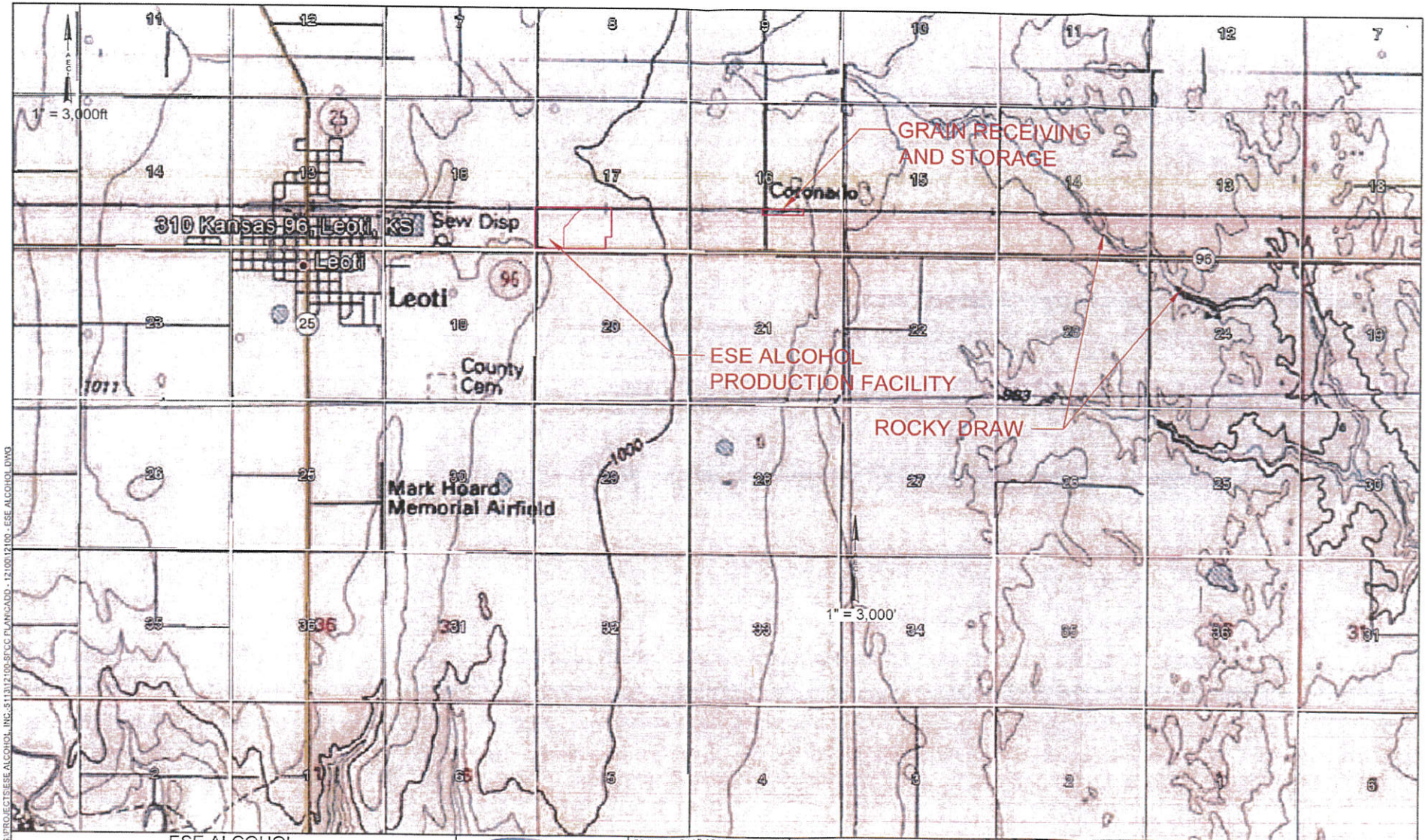
ESE ALCOHOL 310 E. HWY 96 LEOTI, KS 67861	Allied Environmental Consultants 1109 N. TOPEKA • WICHITA, KS 67214 • 316 262 5698	PROJECT 5113:12100 DATE: 10-09-2012 DWN BY SML CHKD BY TBF	LOCATION MAP	FIG: 1 SHT 1 OF 5



ESE ALCOHOL 310 E. HWY 96 LEOTI, KS 67861	Allied Environmental Consultants 109 N. TOPEKA • WICHITA, KS 67214 • 316.262.5692	PROJECT 5113-12100 DATE: 10-09-2012 DWN BY: SML CHKD BY: TBF	TOPOGRAPHIC MAP	FIG: 2 SHT 2 OF 5

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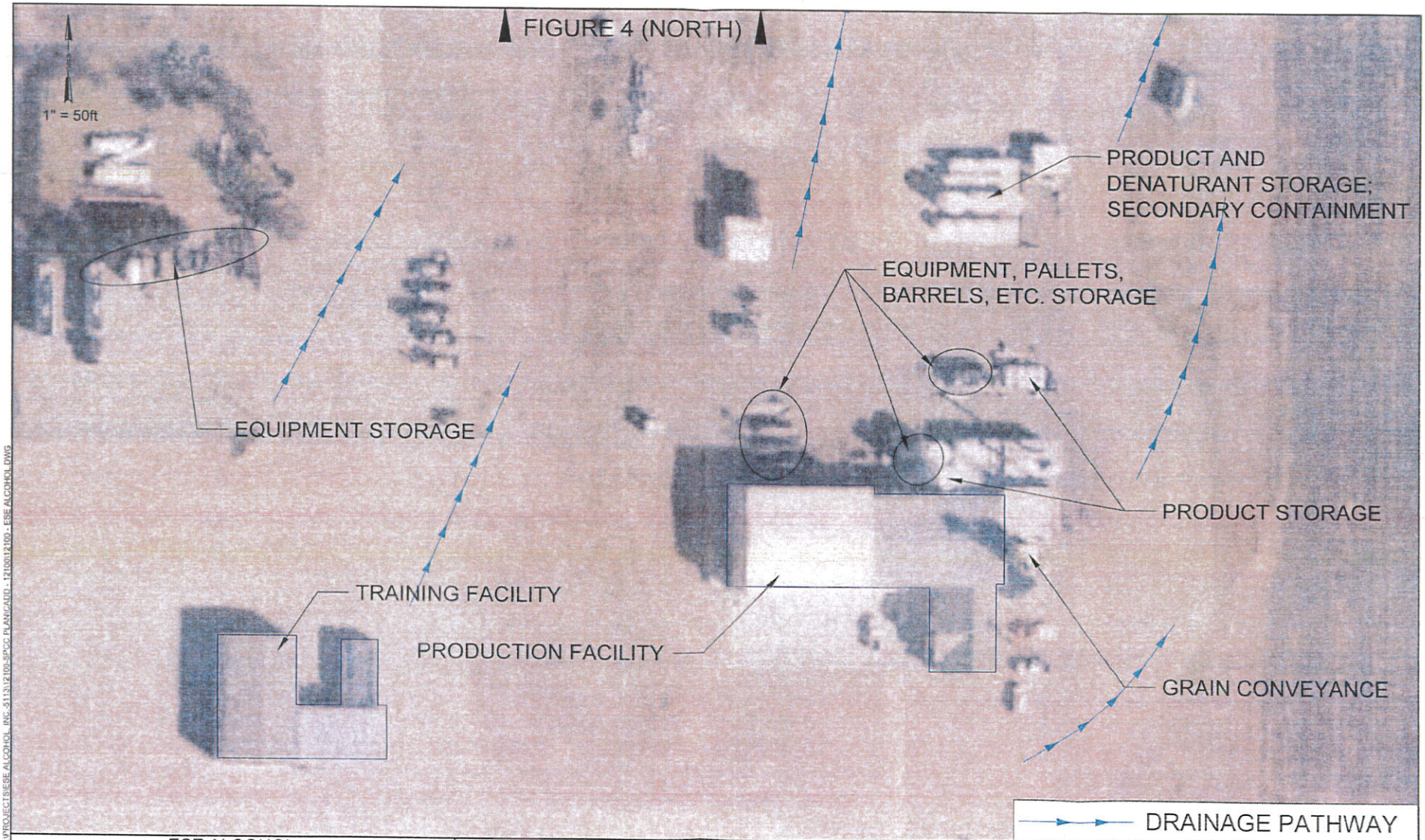

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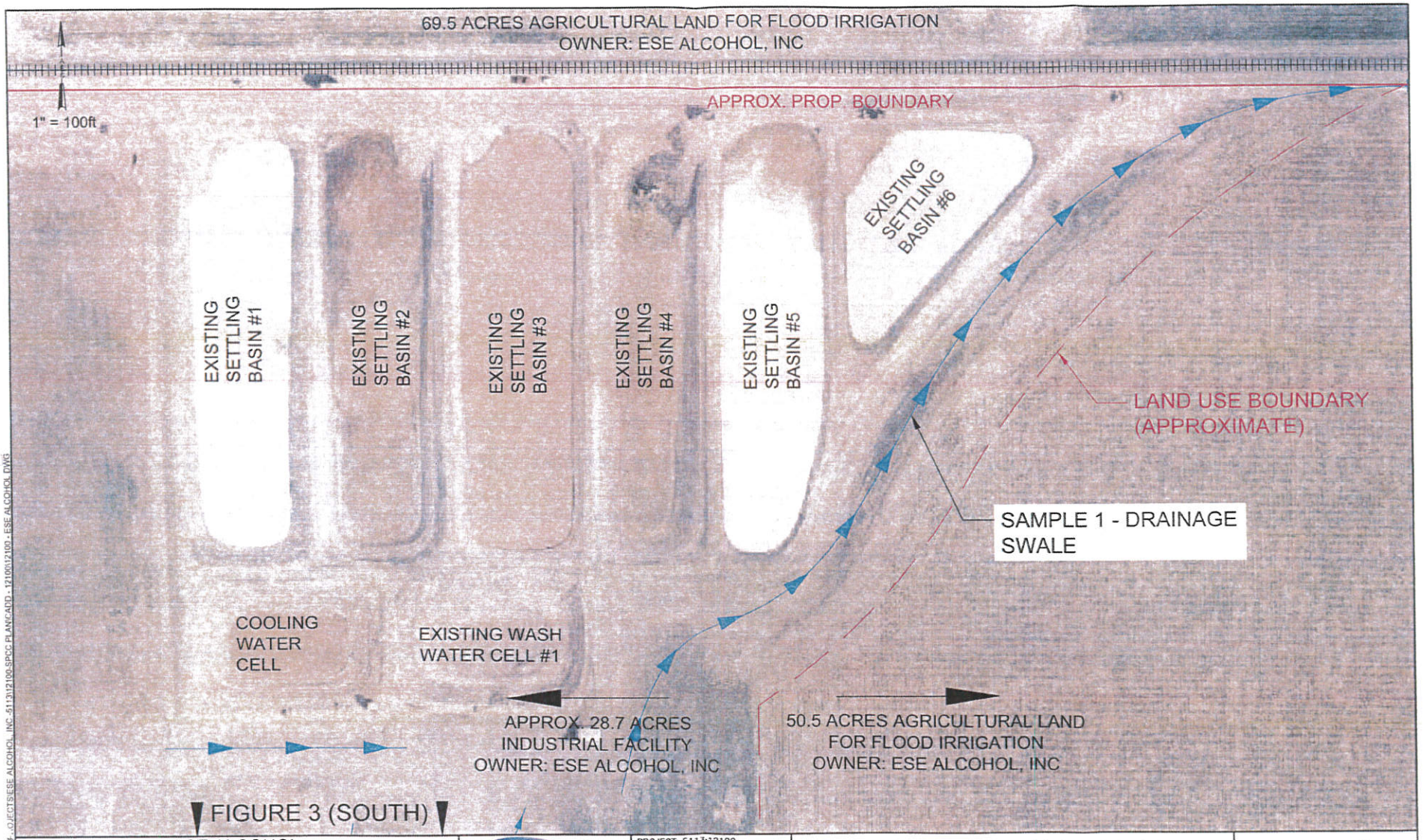
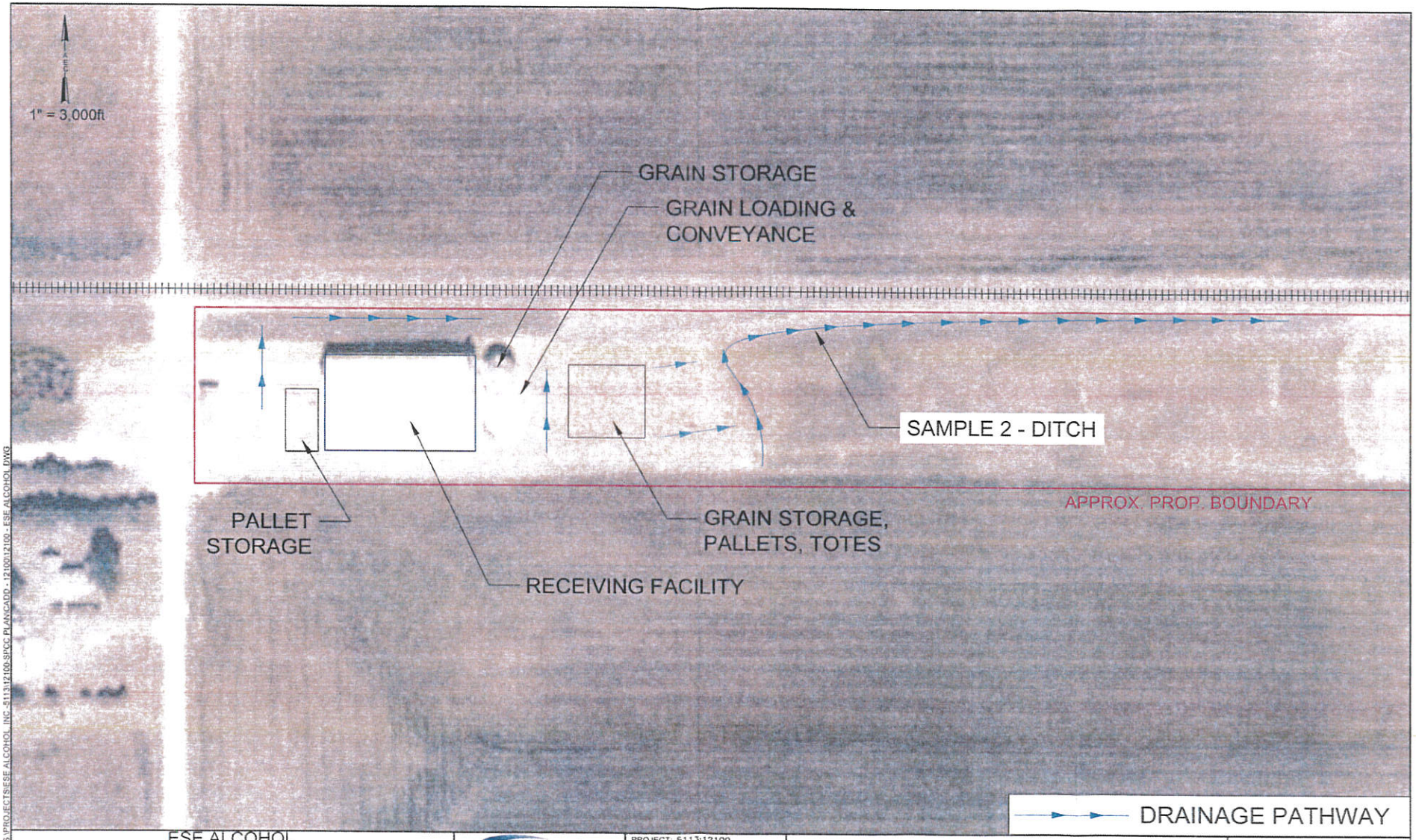
ESE ALCOHOL 310 E. HWY 96 LEOTI, KS 67861	Allied Environmental Consultants 1109 N. TOPEKA • WICHITA, KS 67214 • 316.262.5696	PROJECT: 5113-12100 DATE: 10-09-2012 DWN BY: SML CHKD BY: TBF	PRODUCTION (MAIN) FACILITY DRAINAGE (SOUTH)	FIG: 3 SHT: 3 OF 5



ESE ALCOHOL 310 E. HWY 96 LEOTI, KS 67861	Allied Environmental Consultants 5109 N. TOPEKA • WICHITA, KS 67214 • 316.262.5698	PROJECT 5113:12100 DATE: 10-09-2012 DWN BY: SML CHKD BY: TBF	PRODUCTION (MAIN) FACILITY DRAINAGE (NORTH)	FIG: 4 SHT 4 OF 5

FILENAME: S:\...\OJECTS\ESE ALCOHOL, INC.-5113\12100-SPCC PLAN\CADD - 12100\12100 - ESE ALCOHOL.DWG



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ESE ALCOHOL 127 N. COUNTY RD. 15 $\frac{1}{2}$ LEOTI, KS 67861	Allied Environmental Consultants 2109 N. TOPEKA • WICHITA, KS 67214 • 316.262.5696	PROJECT: 5113:12100 DATE: 10-09-2012 DWN BY: SML CHKD BY: TBF	RECEIVING FACILITY DRAINAGE	FIG: 5 SHT 5 OF 5

APPENDIX B

NPDES PERMIT APPLICATION

[ADD NOI APPLICATION HERE]

APPENDIX C

MATERIALS INVENTORY, EXPOSURE REVIEW, AND BMP EVALUATION

MATERIAL INVENTORY - List all materials used, stored, or produced on site. Include material assessment and evaluation for their potential to contribute pollutants to stormwater runoff. Complete Worksheet 3A if the material has been exposed during the last three years.

WORKSHEET #3
Completed by: AEC
Title:
Date: 10/12/2012

Material	Purpose // Location	Quantity (units)			Quantity Exposed in Last 3 Years	Likelihood of contact with stormwater. If yes, describe reason.	Past Significant Spill or Leak	
		Used	Produced	Stored			YES	NO
Natural Gasoline tanks	Denature ethanol // secondary containment dike			~17,073 gal	None	None – very low		XX
Product tanks	Refined and intermediate product // various locations at main facility		Varies	Varies	None	None – very low		XX
Grain (corn)	Raw product // Grain bins at both facilities			Varies	600lbs (estimated 200lbs per year)	Medium.		
Equipment	Various uses // various locations at main facility			Varies	Varies	Very high		
Materials	Various materials // various locations at both facilities			Varies	Varies	Very high		

DESCRIPTION OF EXPOSED SIGNIFICANT MATERIAL - Based on the material inventory, list the significant materials that were exposed to stormwater during the past three years and/or are currently exposed.

WORKSHEET #3A
Completed by: AEC
Title:
Date: 10/12/2012

Description of Exposed Significant Material	Period of Exposure	Quantity Exposed (units)	Location (as indicated on the site map)	Method of Storage or Disposal (e.g., pile, drum, tank)	Description of Material Management Practice (e.g. pile covered, drum sealed)
Grain (corn)	3+ years	200lbs/yr	Figs. 3 & 5, "Grain Storage"	Grain bins and totes	Bins and totes are sealed. Potential for spills during shipping/handling and/or crushed totes/open bags.
Equipment	3+ years	Numerous Equip.	Fig. 3, "Equipment Storage"	Equipment is stored on exterior racks and/or located out of the way of traffic	
Materials	3+ years	Numerous Materials	Fig. 3, "Equipment, Pallets, Barrels, etc. Storage"	Material is stored on exterior racks	Empty pallets and totes are stacked and removed from the site as soon as possible.

POLLUTANT SOURCE IDENTIFICATION: List all identified stormwater pollutant sources and describe existing management practices that address those sources. In the third column, list BMP options that can be incorporated into the plan to address remaining sources of pollutants.		Worksheet #4 Completed by: AEC Title: Date: 10/12/2012
Stormwater Pollutant Sources	**Existing Management Practices**	**Description of New BMP Options**
1. Ethanol Spillage – fuel	None	Place hose for truck loading into the secondary containment structure after each use.
2. Corn Spillage – TSS, nitrates	None	Routine sweeping of corn storage areas and around conveyor systems.
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

BMP IDENTIFICATION: Describe the Best Management Practices that you have selected to include in your plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations. Also describe any additional activity-specific and site-specific BMPs that you have selected. Attach additional sheets if necessary.

Worksheet #7A
Completed by: AEC
Title:
Date: 10/12/2012

BMPs	Brief Description of Activities
Good Housekeeping	See Plan
Preventive Maintenance	See Plan
Inspections	See Plan
Spill Prevention Response	See Plan
Sediment and Erosion Control	See Plan
Management of Runoff	See Plan
Additional BMPs (Activity-specific and Site-specific)	See Plan

IMPLEMENTATION: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e., any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

Worksheet #8
Completed by: AEC
Title:
Date: 10/12/2012

BMPs	Description of Action(s) Required for Implementation	Scheduled Completion Date(s) for Req'd. Action	Person Responsible for Action	Notes
Good Housekeeping	1. Place ethanol hose into secondary containment	October 2012	Rob Carson	
	2. Clean up corn product when spilled	October 2012	Rob Carson	
	3.			
Preventive Maintenance	1.			
	2.			
	3.			
Inspections	1. Inspect water at least once per year (EPA recommends quarterly)	December 2012	Rob Carson	Sample at "Sample 1" and "Sample 2" locations shown in App. A.
	2.			
	3.			
Spill Prevention and Response	1.			
	2.			
	3.			
Sediment and Erosion Control	1.			
	2.			
	3.			
Management of Runoff	1.			
	2.			
	3.			

EMPLOYEE TRAINING: Describe the employee training program for your facility below. The program should, at a minimum, address spill prevention and response, good housekeeping, and material management practices. Provide a schedule for the training program and list the employees who attend training sessions.

Worksheet #9
Completed by: _____
Title: _____
Date: _____

Training Topics	Brief Description of Training Program/Materials (e.g., film, newsletter course)	Schedule for Training (list dates)	Attendees
Spill Prevention and Response	Primary: Course & Orientation Secondary: Department meetings & briefings	All new hires Existing staff, as needed	See Records
Good Housekeeping	Primary: Course & Orientation Secondary: Department meetings & briefings	All new hires Existing staff, as needed	See Records
Material Management Practices	Primary: Course & Orientation Secondary: Department meetings & briefings	All new hires Existing staff, as needed	See Records
Other Topics			See Records

APPENDIX D

NON-STORMWATER CERTIFICATION

NON-STORMWATER DISCHARGE ASSESSMENT AND CERTIFICATION

Date of Test or Evaluation	Outfall Directly Observed During the Test (identify as indicated on the site map)	Method Used to Test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Stormwater Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation

CERTIFICATION

I, _____ (responsible corporate official), 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.

Name & Official Title: _____
(type or print)

Area Code and Telephone No.: _____

Signature: _____

Date Signed: _____

APPENDIX E

SPILL HISTORY

LIST OF SIGNIFICANT SPILLS AND LEAKS - Record below all significant spills and significant leaks of toxic or hazardous pollutants that have occurred at the facility in the three years prior to the effective date of the permit. Significant spills include, but are not limited to, released of oil or hazardous substances in excess of reportable quantities.

WORKSHEET #10
Completed by: _____
Title: _____
Date: _____

1st Year Prior

Date (month/day/year)	Spill	Leak	Location (as indicated on site map)	Description				Response Procedure		Preventive Measures Taken
				Type of Material	Quantity	Source, if known	Reason	Amount of Material Recovered	Material No Longer Exposed to Stormwater (true/false)	

2nd Year Prior

Date (month/day/year	Spill	Leak	Location (as indicated on site map)	Description				Response Procedure		Preventive Measures Taken
				Type of Material	Quantity	Source, if known	Reason	Amount of Material Recovered	Material No Longer Exposed to Stormwater (true/false)	

3rd Year Prior

Date (month/day/year)	Spill	Leak	Location (as indicated on site map)	Description				Response Procedure		Preventive Measures Taken
				Type of Material	Quantity	Source, if known	Reason	Amount of Material Recovered	Material No Longer Exposed to Stormwater (true/false)	