Industrial SWPPP Template

Introduction

To help you develop a Stormwater Pollution Prevention Plan (SWPPP) that is consistent with the 2021 Multi-Sector General Permit (2021 MSGP), the United States Environmental Protection Agency (EPA) has created this Industrial SWPPP Template (or, "the Template"). Use of the Template will help ensure that your SWPPP addresses all the necessary elements required in Part 6 of the 2021 MSGP. Part 2 of the 2021 MSGP includes control measures and effluent limits that tell what you must physically do on-site to control pollutants in your stormwater discharges and that drive some of what is documented in your SWPPP.

Before completing the Template, make sure you read and understand the requirements in the 2021 MSGP. A copy of the MSGP is available at https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp.

Using the Industrial SWPPP Template

Tips for completing the Template:

- **This Template is designed for use by all facilities eligible for coverage under the 2021 MSGP. The Template is NOT tailored to your individual industrial sector. Depending upon your industrial sector (see Appendix D of the 2021 MSGP) and where your facility is located (see Appendix C of the 2021 MSGP), you may need to address additional SWPPP requirements outlined in Part 8 (Sector Specific Requirements) and/or Part 9 (Conditions Applicable to States, Indian Country Lands or Territories) of the permit, respectively.**
- **Complete a SWPPP *before* submitting your Notice of Intent (NOI) for permit coverage.**
- **Each section includes "instructions" and space for your facility's specific information. You should read the instructions for each section before you complete that section.**
- **The Template was developed in *Microsoft Word* so that you can easily add tables and additional text. Some sections may require only a brief description while others may require several pages of explanation.**
- **To make it easier to complete, the Template generally uses blue text where the operator is expected to enter information.**

EPA notes that while EPA has made every effort to ensure the accuracy of all instructions and guidance contained in the Template, the actual obligations of regulated industrial facilities are determined by the relevant provisions of the permit, not by the Template. In the event of a conflict between the Template and any corresponding provision of the 2021 MSGP, the permit controls. EPA welcomes comments on the Template at any time and will consider those comments in any future revision of this document. Please submit comments to MSGP@epa.gov.

Page Intentionally Blank

Stormwater Pollution Prevention Plan

for:

Duncan Galvanizing Corp.
69 Norman St.
Everett, MA 02149
617-389-8440

SWPPP Contact(s):

Duncan Galvanizing Corp.
Michael Williams
69 Norman St.
Everett, MA 02149
617-389-8440
MWilliams@duncangalvanizing.com

Calvin Patten
69 Norman St.
Everett, MA 02149
617-389-8440
CPatten@duncangalvanizing.com

SWPPP Preparation Date:

5/ 26 / 2021

Page Intentionally Blank

Table of Contents

SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information.

Instructions:

- You will need the information from this section to complete your NOI.
- For further instruction, refer to the 2021 MSGP NOI form and instructions – specifically sections C and D of the 2021 MSGP Appendix G Notice of Intent (NOI). A copy of the 2021 MSGP NOI is available at https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp (Appendix G of the permit)
- You must include a copy of the 2021 MSGP, or a reference or link to where a copy can be found, in Attachment C of your SWPPP.

Facility Information

Facility Name: Duncan Galvanizing Corp.

Street/Location: 69 Norman St.

City: Everett State: MA ZIP Code: 02149

County or Similar Government Subdivision: Middlesex

NPDES ID (i.e., permit tracking number): MAR05J016 (if covered under a previous permit)

Primary Industrial Activity SIC code, and Sector and Subsector (2021 MSGP, Appendix D and Part 8):
3471; 3479

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (2021 MSGP, Appendix D):
Subsector AA1, 3471; Subsector AA2, 33479

Is your facility presently inactive and unstaffed and are there no industrial materials or activities exposed to stormwater? ☐ Yes ☒ No

Latitude/Longitude

Latitude:
42.4066 º N (decimal degrees)

Longitude:
071.0684 º W (decimal degrees)

Method for determining latitude/longitude (check one):

☐Maps (If USGS topographic map used, specify scale:) ☐GPS

☒Other (please specify): Satellite image from Google Maps

Horizontal Reference Datum (check one):

☐NAD 27 ☐NAD 83 ☒WGS 84

Is the facility located in Indian country? ☐ Yes ☒ No

If yes, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if applicable). Not applicable

Are you considered a "federal operator" of the facility?

Federal Operator – an entity that meets the definition of "operator" in [the 2021 MSGP] and is either any department, agency or instrumentality of the executive, legislative, and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality. ☐ Yes ☒ No

Estimated area of industrial activity at your facility exposed to stormwater: 4.568
(to the nearest quarter acre)

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)?
☒ Yes ☐ No

If yes, name of MS4 operator: Massachusetts Water Resources Authority

Name(s) of surface water(s) that receive stormwater from your facility: Malden River.

Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2021 MSGP, Appendix A)? ☐ Yes ☒ No

If Yes, identify name of the impaired water(s) (and segment(s), if applicable): Not applicable

Identify the pollutant(s) causing the impairment(s): Not applicable

Which of the identified pollutants may be present in industrial stormwater discharges from this facility? Not applicable

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants: Not applicable

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water (see definitions in 2021 MSGP, Appendix A)? ☐ Yes ☒ No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2021 MSGP Table 1-1)? ☐ Yes ☒ No
If Yes, which guidelines apply? Not applicable

1.2 Contact Information/Responsible Parties.

Instructions:

- List the facility operator(s), facility owner and SWPPP contact(s). Indicate respective responsibilities, where appropriate.
- You will need the information from this section of the SWPPP Template for your NOI.
- Refer to Section B of the NOI instructions (available in Appendix G of the 2021 MSGP).

Facility Operator(s):

Name: Duncan Galvanizing Corp.
Address: 69 Norman St.
City, State, Zip Code: Everett, MA 02149
Telephone Number: 617-389-8440
Email address: MWilliams@duncangalvanizing.com
Fax number: 617-389-2831

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

Facility Owner(s):

Name: B&R Realty Associates LLC
Address: 69 Norman St
City, State, Zip Code: Everett, MA 02149
Telephone Number: 617-389-8440
Email address: MWilliams@duncangalvanizing.com
Fax number: 617-389-2831

Name: EEKA Limited Partnership
Address: 69 Norman St
City, State, Zip Code: Everett, MA 02149
Telephone Number: 617-389-8440
Email address: MWilliams@duncangalvanizing.com

Name: DGC Realty Associates LLC
Address: 69 Norman St
City, State, Zip Code: Everett, MA 02149
Telephone Number: 617-389-8440
Email address: MWilliams@duncangalvanizing.com

Name: Richard L. Brooks Federal Marital Trust
Address: 69 Norman St
City, State, Zip Code: Everett, MA 02149
Telephone Number: 617-389-8440
Email address: MWilliams@duncangalvanizing.com

Name: Richard L. Brooks Mass Marital Trust
Address: 69 Norman St
City, State, Zip Code: Everett, MA 02149
Telephone Number: 617-389-8440
Email address: MWilliams@duncangalvanizing.com

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

SWPPP Contact(s):

SWPPP Contact Name (Primary): Michael Williams
Telephone number: 617-389-8440
Email address: MWilliams@duncangalvanizing.com
Fax number: 617-389-2831

SWPPP Contact Name (Backup): Calvin Patten
Telephone number: 617-389-8440
Email address: cpatten@duncangalvanizing.com
Fax number: 617-389-2831

1.3 Stormwater Pollution Prevention Team.

Instructions (see 2021 MSGP Part 6.2.1):

The stormwater pollution prevention team is responsible for overseeing development of the facility's SWPPP, any modifications to it, and for implementing and maintaining control measures, taking corrective action and or additional implementation measure (AIM) responses when required. Each member of the stormwater pollution prevention team should have ready access to the 2021 MSGP, the most updated copy of the SWPPP, and other relevant documents that must be kept with the SWPPP.

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

Staff Names	Individual Responsibilities
Michael Williams, President	Oversee development & modification of SWPPP
Calvin Patten, Environmental, Health & Safety Manager	Oversee development & modification of SWPPP Take corrective actions when required
Kal Sulaman, Facility Manager	Implement & maintain control measures
John Bradley, Engineering Consultant	Oversee development & modification of SWPPP
[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]

1.4 Site Description.

Instructions (see 2021 MSGP Part 6.2.2):

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

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

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

Outdoor activities:

Delivery from customers, with unloading, of uncoated fabricated steel to be galvanized.

Temporary storage of uncoated fabricated steel to be galvanized.

Temporary storage of galvanized materials prior to pickup by customers.

Loading of galvanized materials for delivery to customers.

Transfer of spent blast media into dumpster.

Indoor activities:

Galvanizing and painting.

Plating and tinning.

1.5 General Location Map.

Instructions (see 2021 MSGP Part 6.2.2):

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

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

1.6 Site Map.

Instructions (see 2021 MSGP Part 6.2.2):

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

- Boundaries of the property and the size of the property in acres;
- Location and extent of significant structures and impervious surfaces;
- Directions of stormwater flow (use arrows), including flows with a significant potential to cause soil erosion;
- Locations of all stormwater control measures;
- Locations of all receiving waters, including wetlands, in the immediate vicinity of your facility, indicating which waterbodies are listed as impaired and which are identified by your state, tribe or EPA as Tier 2, Tier 2.5, or Tier 3 waters;
- Locations of all stormwater conveyances including ditches, pipes, and swales;
- Locations of potential pollutant sources identified under Part 6.2.3;
- Locations where significant spills or leaks identified under Part 6.2.3.3 have occurred;
- Locations of all stormwater monitoring points;
- Locations of stormwater inlets and discharge points, with a unique identification code for each discharge point (e.g., 001, 002), indicating if you are treating one or more discharge points as "substantially identical" under Parts 3.2.4.5, 6.2.5.3, and 4.1.1, and an approximate outline of the areas draining to each discharge point;
- If applicable, MS4s and where your stormwater discharges to them;
- Areas of Endangered Species Act-designated critical habitat for endangered or threatened species, if applicable; and
- Locations of the following activities where such activities are exposed to precipitation:
  - fueling stations;
  - vehicle and equipment maintenance and/or cleaning areas;
  - loading/unloading areas;
  - locations used for the treatment, storage, or disposal of wastes;
  - liquid storage tanks;
  - processing and storage areas;
  - immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
  - transfer areas for substances in bulk;
  - machinery; and
  - locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants.

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

SECTION 2: POTENTIAL POLLUTANT SOURCES

Section 2 will describe all areas at your facility where industrial materials or activities are exposed to stormwater or from which authorized non-stormwater discharges originate. Industrial materials or activities include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; intermediate products, by-products, final products, and waste products. Material handling activities include, but are not limited to: the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. For structures located in areas of industrial activity, you must be aware that the structures themselves are potential sources of pollutants. This could occur, for example, when metals such as aluminum or copper are leached from the structures as a result of acid rain.

For each area identified, the SWPPP must include industrial activities in the area, potential pollutants or pollutant constituents for each identified activity, documentation of where potential spills and leaks could contribute pollutants to stormwater discharges, evaluation of unauthorized non-stormwater discharges, salt storage location, stormwater discharge sampling data and descriptions of stormwater control measures.

2.1 Potential Pollutants Associated with Industrial Activity.

Instructions (see 2021 MSGP Parts 6.2.3.1 and 6.2.3.2):

For the industrial activities identified in section 1.4 above, list the potential pollutants or pollutant constituents (e.g., crankcase oil, zinc, sulfuric acid, cleaning solvents).

In your list of pollutants associated with your industrial activities, include all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the three years prior to the date you prepare or amend your SWPPP.

Industrial Activity	Associated Pollutants
Storage of customers' galvanized products	Zinc
Vehicle tracking by material handling traffic carrying zinc dust from indoors	Zinc
Dust from spent blast media placed into dumpster	Zinc
[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]

If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis?

☐ Yes ☒ No

If you are a Sector G (Metal Mining) facility, do you have discharges from waste rock and overburden piles?

☐ Yes ☒ No

2.2 Spills and Leaks.

Instructions (See 2021 MSGP Part 6.2.3.3):

Include the following in this section:

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

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

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Discharge Points
Diesel fuel dispensing area	Outfall 008
[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]

Description of Past Spills/Leaks

Date	Description	Discharge Points
N/A	No spills or leaks in previous three years	Not applicable
[Repeat as necessary]	[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]	[Repeat as necessary]
[Repeat as necessary]	[Repeat as necessary]	[Repeat as necessary]

2.3 Unauthorized Non-stormwater Discharges Evaluation.

Instructions (see 2021 MSGP Part 6.2.3.4):

Part 1.2.2 of the 2021 MSGP identifies authorized non-stormwater discharges. The questions below require you to provide documentation of the following:

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

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

- Date of evaluation: May 2021
- Description of the evaluation criteria used: Reference to MSGP. No unauthorized non-stormwater discharges noted.
- List of the discharge points or onsite drainage points that were directly observed during the evaluation: Outfall 001 through Outfall 008
- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), or documentation that a separate NPDES permit was obtained. For example, a floor drain was sealed, a sink drain was re-routed to sanitary or an NPDES permit application was submitted for an unauthorized cooling water discharge: Not applicable

2.4 Salt Storage.

Instructions (see 2021 MSGP Part 6.2.3.5):

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

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

No storage piles containing salt are located on the property.

2.5 Sampling Data Summary.

Instructions (See 2021 MSGP Part 6.2.3.6):

Existing permitted facilities must summarize all stormwater discharge sampling data collected at the facility during the previous permit term. Include a narrative description that adequately summarizes the collected sampling data to support identification of potential pollution sources. Note that data tables and/or figures may be used to aid the summary. New discharges and new sources must provide a summary of any available stormwater data they may have.

Review of the data indicates that metals in the stormwater are beyond Bench Mark amount. This is assumed to be due to past work practices from transferring spent blast media from the dust collector to the dumpster. Several approaches have been initiated (installation of a rotary pump, using tied off plastic bags, limiting drum capacity) to minimize stormwater contamination. We believe that the pollution control measures will reduce future stormwater contamination.

Outfall	Due Date	Iron	Aluminum	Zinc	Nitrate Nitrite
1	2/28/2021	8.4	2.86	8.34	0.0886
2	2/28/2021			see Outfall 1	
3	2/28/2021	11.2	7.73	0.636	0.268
4	2/28/2021	N/A	N/A	1.2	0.1003
5	2/28/2021			see Outfall 4	
6	2/28/2021	N/A	N/A	2.7	0.12
7	2/28/2021	N/A	N/A	18.2	0.168
8	2/28/2021			see Outfall 7	
1	11/30/2020	9.2	3.05	9.74	0.0779
2	11/30/2020			see Outfall 1	
3	11/30/2020	9.02	5.89	3.85	0.1236

4	11/30/2020	N/A	N/A	2.7	0.0854
5	11/30/2020			see Outfall 4	
6	11/30/2020	N/A	N/A	3.9	0.218
7	11/30/2020	N/A	N/A	23.4	0.13
8	11/30/2020			see Outfall 7	
1	8/31/2020	5.29	1.63	5.63	0.151
2	8/31/2020			see Outfall 1	
3	8/31/2020	3.05	1.39	2.86	0.122
4	8/31/2020	N/A	N/A	1.48	0.0793
5	8/31/2020			see Outfall 4	
6	8/31/2020	N/A	N/A	2.06	0.0908
7	8/31/2020	N/A	N/A	13.8	0.198
8	8/31/2020			see Outfall 7	
1	5/31/2020	10.9		9.41	0.173

SECTION 3: STORMWATER CONTROL MEASURES (SCM)

Instructions (See 2021 MSGP Parts 2.1.2, Part 8, and 6.2.4):

In Sections 3.1 - 3.4 of this SWPPP template, you are asked to describe the stormwater control measures (SCMs) that you have installed at your site to meet each of the permit's

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

Regarding your control measures, you must also document, as appropriate:

- How you addressed the selection and design considerations in the 2021 MSGP Part 2.1.1); and
- How they address the pollutant sources identified in section 2.1 of the Template.

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

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

3.1.1 Minimize Exposure.

Instructions (see 2021 MSGP Part 2.1.2.1):

Describe any structural controls or practices used to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt and stormwater. Describe where the controls or practices are being implemented at your site.

Outdoor activities:

Delivery from customers, with unloading, of uncoated fabricated steel to be galvanized.

Temporary storage of uncoated fabricated steel to be galvanized.

Temporary storage of galvanized materials prior to pickup by customers.

Loading of galvanized materials for delivery to customers.

Transfer of spent blast media into dumpster.

Absorbent materials stored nearby in spill kit in case of diesel fuel drippage during fueling operations.

3.1.2 Good Housekeeping.

Instructions (see 2021 MSGP Parts 2.1.2.2 and 6.2.5.1.a):

Describe any practices you are implementing to keep exposed areas of your site that are potential sources of pollutants clean. Describe where each practice is being implemented at your site. Include here your schedule or convention used for: (1) determining when pickup and disposal of waste materials occurs; and (2) routine inspections for leaks and conditions of drums, tanks, and containers. Note: There are specific requirements for facilities that handle pre-production plastic.

Sweep storage yard to remove iron dust and potential floatable debris.

Sweep indoor galvanizing area to remove zinc dust and prevent stormwater exposure and vehicle tracking.

Dumpster lids closed when not in use.

Dumpsters to be removed and replaced when full.

All paints and painting equipment are located indoors.

Use of barrel liners for spent blast media

3.1.3 Maintenance.

Instructions (see 2021 MSGP Parts 2.1.2.3 and 6.2.5.1.b):

Describe procedures to: (1) maintain all control measures in effective operating condition; and (2) maintain industrial equipment and systems in order to minimize pollutant discharges. Include the schedule or frequency you will follow for such maintenance activities. Describe where each applicable procedure is being implemented at the site.

Vehicle maintenance performed by third party contractor, who uses drain pans to catch any fluids.

Spill kits available in Galvanizing, Plating, and Wastewater Treatment areas.
Personnel are trained in use of spill kits during annual refresher training.
Dust collectors to be inspected quarterly to prevent dust escape.
Catch basins to be cleaned to prevent buildup of debris.

3.1.4 Spill Prevention and Response Procedures.

Instructions (see 2021 MSGP Parts 2.1.2.4 and 6.2.5.1.c):

Describe any structural controls or procedures used to prevent the potential for leaks, spills, and other releases that may be exposed to stormwater and respond to any spills and leaks, including notification procedures. You must conduct spill prevention and response measures, including but not limited to the following:

- Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- Use drip pans and absorbents if leaky vehicles and/or equipment are stored outdoors;
- Use spill/overflow protection equipment;
- Plainly label containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides”) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;*
- Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas;
- Develop training on procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible;
- Keep spill kits onsite, located near areas where spills may occur or where a rapid response can be made; and
- Notify appropriate facility personnel when a leak, spill or other release occurs.
- Specify cleanup equipment, procedures and spill logs, as appropriate, in the event of spills.

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

Note: Some facilities may be required to develop a Spill Prevention Control and Countermeasure (SPCC) plan under a separate regulatory program (40 CFR 112). If you are required to develop an SPCC plan, or you already have one, you may include references to the relevant requirements from your plan provided that you keep a copy of that other plan onsite and make it available for review.

EPA recommends you include:

Where a leak, spill or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302 occurs during a 24-hour period, you must notify the National Response Center (NRC) at (800) 424-8802 or, in the Washington, DC, metropolitan area, call (202) 267-2675 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. State or local requirements may necessitate

reporting spills or discharges to local emergency response, public health, or drinking water supply agencies. Contact information must be in locations that are readily accessible and available.

All waste containers (diesel tank, outdoor hydrochloric acid tank) are labeled per regulations.

Spill kits are on-site to respond to spills or leaks.

Spill kits are located in Galvanizing, Plating, and Wastewater Treatment.

3.1.5 Spill teams are identified and trained and will be notified in case of spill. Erosion and Sediment Controls.

Instructions (see 2021 MSGP Parts 2.1.2.5 and 6.2.5.1.d):

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

Not applicable.

3.1.6 Management of Stormwater.

Instructions (See 2021 MSGP Part 2.1.2.6):

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

Not applicable.

3.1.7 Salt Storage Piles or Piles Containing Salt.

Instructions (see 2021 MSGP Part 2.1.2.7):

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

There are no salt piles on site.

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials.

Instructions (see 2021 MSGP Part 2.1.2.10):

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

Sweep storage yard to remove iron dust and potential floatable debris.

Sweep indoor galvanizing area to remove zinc dust and prevent stormwater exposure and vehicle tracking.

Dust collectors in place to collect blasting media dust.

Spent blast media to be bagged prior to transfer to dumpster.

3.2 Numeric Effluent Limitations Based on Effluent Limitations Guidelines (ELGs).

Instructions (see 2021 MSGP Part 2.1.3):

If you are in an industrial category subject to one of the ELGs identified in the table below (Table 2-1 of the 2021 MSGP), describe controls or procedures that will be implemented at your site to meet these effluent limitations guidelines.

Not applicable.

Regulated Activity	40 CFR Part/Subpart	Effluent Limit
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	Part 429, Subpart I	See Part 8.A.8
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	Part 418, Subpart A	See Part 8.C.5
Runoff from asphalt emulsion facilities	Part 443, Subpart A	See Part 8.D.5
Runoff from material storage piles at cement manufacturing facilities	Part 411, Subpart C	See Part 8.E.6
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	Part 436, Subparts B, C, or D	See Part 8.J.10
Runoff from hazardous waste landfills	Part 445, Subpart A	See Part 8.K.7
Runoff from non-hazardous waste landfills	Part 445, Subpart B	See Part 8.L.11
Runoff from coal storage piles at steam electric generating facilities	Part 423	See Part 8.O.8
Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	Part 449	See Part 8.S.9

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

Instructions (see 2021 MSGP Part 2.2.1):

Describe the measures that will be implemented at your site to control industrial stormwater discharge as necessary to meet applicable water quality standards of all applicable states, tribes, and U.S. territories.

EPA expects that compliance with the conditions in this permit will control discharges as necessary to meet applicable water quality standards. If at any time you become aware, or EPA determines, that your stormwater discharge will not be controlled as necessary such that the receiving water of the United States will not meet an applicable water quality standard, you must take corrective action(s) as required in Part 5.1 of the 2021 MSGP and document the corrective actions as required in 2021 MSGP Part 5.3. You must also comply with any additional requirements that your state or tribe requires in 2021 MSGP Part 9.

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

Several approaches have been initiated, which include installation of a rotary valves, using tied off plastic bags, limiting drum capacity, and replacing dust collector filters.

3.4 Sector-Specific Non-Numeric Effluent Limits.

Instructions (see 2021 MSGP Part 8):

Describe any controls or procedures that will be used at your site to comply with any sector-specific requirements that apply to you in Part 8 of the 2021 MSGP. Describe the location at your site where each control and/or procedure will be implemented.

Note: Sector-specific effluent limits apply to Sectors A, E, F, G, H, I, J, L, M, N, O, P, Q, R, S, T, U, V, X, Y, Z and AA.

Several approaches have been initiated, which include installation of a rotary valves, using tied off plastic bags, limiting drum capacity, and replacing dust collector filters.

SECTION 4: SCHEDULES AND PROCEDURES

4.1 Good Housekeeping.

Instructions (see 2021 MSGP Part 6.2.5.1.a):

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

Roll off dumpsters are collected when full.

Entire yard to be swept as part of routine maintenance.

Interior of plant to be swept as part of routine maintenance.

4.2 Maintenance.

Instructions (see 2021 MSGP Part 6.2.5.1.b):

Document preventative maintenance procedures, including regular inspections, testing, maintenance and repair of all stormwater control measures to avoid situations that may result in leaks, spills, and other releases, and any back-up practices in place should a runoff event occur while a control measure is off-line. Include the schedule or frequency for maintaining all control measures used to comply with the effluent limits in Part 2 of the 2021 MSGP.

Outdoor containers (diesel fuel, hydrochloric acid tank) inspected as part of routine maintenance.

Drums indoors are inspected for leaks or damage as part of routine maintenance.

Spill kits are restocked if used.

4.3 Spill Prevention and Response Procedures.

Instructions (see 2021 MSGP Part 6.2.5.1.c):

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

management practices (BMP) programs otherwise required by an NPDES permit for the facility, provided that you keep a copy of that other plan onsite and make it available for review.

Per the Galvanizing Contingency Plan:

CHEMICAL SPILLS

In case of a tank or pipe rupture, the person who sees the leak will notify the emergency coordinator or the assistant emergency coordinator.

In the case of a pipe rupture, the valves upstream of the leak will be closed by the Supervisor or an operator familiar with system.

The emergency coordinator will determine if the spill is incidental or larger.

A minor incidental spill can be cleaned up by the operators themselves.

One which is larger than a minor spill will be cleaned up by an outside contractor.

If it is not a minor incidental spill, the emergency coordinator will have spill pillows dropped beyond the spill, have the affected area vacated and call in an outside contractor to clean up the spill.

Depending on the type and extent of the spill or leak, he may also decide to call in the fire department. If so, he will activate the alarm system that in turn will initiate the plant emergency procedures.

The Galvanizing Spill Prevention and Control Plan, Attachment C.

4.4 Erosion and Sediment Control.

Instructions (see 2021 MSGP Part 6.2.5.1.d):

Document if polymers and/or other chemical treatments are used as part of your erosion and sediment controls and identify the polymers and/or chemicals used and the purpose.

No erosion and sediment control are practiced or necessary.

4.5 Employee Training.

Instructions (see 2021 MSGP Part 2.1.2.8 and Part 6.2.5.1.e):

Provide the elements of your training plan, including, but not necessarily limited to:

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

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

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become

pollutants discharged via stormwater;

- Personnel who are responsible for conducting and documenting monitoring and inspections as required in 2021 MSGP Parts 3 and 4; and
- Personnel who are responsible for taking and documenting corrective actions as required in 2021 MSGP Part 5.

2021 MSGP Part 2.1.2.8 requires that the personnel who are required to be trained must also be trained to understand the following if related to the scope of their job duties (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections):

- An overview of what is in the SWPPP;
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- The location of all the controls required by this permit, and how they are to be maintained;
- The proper procedures to follow with respect to the permit's pollution prevention requirements;
- When and how to conduct inspections, record applicable findings, and take corrective actions; and
- The facility's emergency procedures, if applicable per 2021 MSGP Part 2.1.1.8.

Personnel receiving annual refresher training:

Yard operators;

Galvanizing finishing forklift operator;

Stormwater Pollution Prevention team members;

Blasters.

Contents of the training:

An overview of what is in the SWPPP

Spill response procedures, good housekeeping, maintenance requirements, and material management practices.

The location of all controls on the site required by this permit, and how they are to be maintained.

The proper procedures to follow with respect to the permit's pollution prevention requirements.

When and how to conduct inspections, record applicable findings, and take corrective actions.

4.6 Inspections and Assessments.

Instructions (see 2021 MSGP Part 3 and Part 6.2.5.2):

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

- Routine facility inspections (see 2021 MSGP Part 3.1) and;
- Quarterly visual assessment of stormwater discharges (see 2021 MSGP Part 3.2).

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

4.6.1 Routine Facility Inspections.

Instructions (see 2021 MSGP Part 3.1):

Describe the procedures you will follow for conducting routine facility inspections in accordance with Part 3.1 of the 2021 MSGP. Document any findings of your facility inspections and maintain this report with your SWPPP as required in Part 6.5 of the 2021 MSGP. Summarize your findings in the annual report per 2021 MSGP Part 7.4. Any corrective action required as a result of a routine facility inspection must be performed consistent with 2021 MSGP Part 5.

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

1. **Person(s) or positions of person(s) responsible for inspection.** One member of the Stormwater Pollution Prevention Team will conduct the inspection. See Section 1.3 for Team members.

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

2. **Schedules for conducting inspections, including tentative schedule for facilities in climates with irregular stormwater discharges.** One routine facility inspection will be conducted each calendar quarter. One of the quarterly inspections will be conducted during a discharge event.

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

3. **List areas where industrial materials or activities are exposed to stormwater**.

   Outdoor Activities:

   Dumpster from customers, with unloading, of uncoated fabricated steel to be galvanized.

   Temporary storage of uncoated fabricated steel to be galvanized.

   Temporary storage of galvanized materials prior to pickup by customers.

   Loading of galvanized materials for delivery to customers.

   Transfer of spent blast media into dumpster.

List areas identified in the SWPPP (section 1 of the SWPPP Template) and those that are potential pollutant sources (see Part 6.2.3). Outdoor activities:

Delivery from customers, with unloading, of uncoated fabricated steel to be galvanized.

Temporary storage of uncoated fabricated steel to be galvanized.

Temporary storage of galvanized materials prior to pickup by customers.

Loading of galvanized materials for delivery to customers.

Transfer of spent blast media into dumpster.

Indoor activities:

Galvanizing and painting.

Plating and tinning.

4. **Areas where spills and leaks have occurred in the past three years.** No spills or leaks have occurred in the past three years
5. **Inspection information for discharge points.** See map for discharge locations. The Discharge locations are by the facility buildings and do not require any special safety considerations other than wearing boots and a raincoat. The inspection shall include looking for Industrial materials, residues, or trash; leaks or spills; offsite 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; non-authorized non-stormwater discharges; control measures needing replacement, maintenance or repair; and perform an inspection during a stormwater event (verifying control measures are functioning properly).
6. **List the control measures used to comply with the effluent limits contained in the 2021 MSGP.** Control measures will be determined depending on the effluent limits contained in the permit.
7. **Other site-specific inspection objectives.** Not applicable.

4.6.2 Quarterly Visual Assessment of Stormwater Discharges.

Instructions (see 2021 MSGP Part 3.2):

Describe the procedures you will follow for conducting quarterly visual assessments in accordance with Part 3.2 of the 2021 MSGP. The visual assessment must be made:

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

Document the results of your visual assessments and maintain this documentation onsite with your SWPPP as required in 2021 MSGP Part 6.5. Any corrective action required as a result of a quarterly visual assessment must be performed consistent with 2021 MSGP Part 5.

The visual assessment will be made: Results of the visual assessments will be documented and maintained onsite with the SWPPP.

- **Of a discharge sample contained in a clean, colorless glass or plastic container, and examined in a well-lit area;**

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

Results of the visual assessments will be documented and maintained onsite with the SWPPP.

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

1. **Person(s) or positions of person(s) responsible for assessments.** Member of Stormwater Pollution Prevention team.
2. **Schedules for conducting assessments.** Assessments will be conducted near the beginning of each calendar quarter.

Specific assessment activities.

Quarterly stormwater samples will be taken within the first 30 minutes of discharge in a storm event.

In a clean glass container, the sample will be inspected for:

Color;

Odor;

Clarity (diminished);

Floating solids;

Settled solids;

Suspended solids;

Foam;

Oil sheen; and

Other obvious indicators of stormwater pollution.

Quarterly Visual Assessment Documentation

Documentation of the visual assessment will include:

Sample location

Sample collection date and time, and visual assessment date and time for each sample

Personnel collecting the sample and performing visual assessment, and their signatures

Nature of the discharge (i.e., runoff or snowmelt

Results of the observations of the stormwater discharge

Probable sources of any observed stormwater contamination

If applicable, why it was not possible to take samples within the first 30minutes

A statement, signed and certified in accordance with Appendix B, Subsection 11

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

Instructions (see 2021 MSGP Parts 3.1.5 and 3.2.4.4):

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

To invoke this exception you must maintain a statement in your SWPPP per Part 6.2.5.2 indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation , in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii). The statement must be signed and certified in accordance with Appendix B, Subsection 11.

Note: If circumstances change and industrial materials or activities become exposed to stormwater or your facility becomes active and/or staffed, this exception no longer applies and you must immediately resume routine facility inspections. If you are not qualified for this exception at the time you become authorized under the 2021 MSGP, but during the permit term you become qualified because your facility becomes inactive and unstaffed, and there are no industrial materials or activities that are exposed to stormwater, you must include the same signed and certified statement as above and retain it with your records pursuant to Part 6.5.

Inactive and unstaffed facilities covered under Sectors G (Metal Mining), H (Coal Mines and Coal Mining-Related Facilities), and J (Non-Metallic Mineral Mining and Dressing) are not required to meet the "no industrial materials or activities exposed to stormwater" standard to be eligible for this exception from routine inspections, per 2021 MSGP Parts 8.G.8.4, 8.H.9.1, and 8.J.9.1.

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

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

Not applicable.

4.7 Monitoring.

Instructions (see 2021 MSGP Part 6.2.5.3):

Describe your procedures for conducting the six types of analytical stormwater discharge monitoring specified by the 2021 MSGP, where applicable to your facility, including:

- Indicator monitoring (2021 MSGP Part 4.2.1):
- Benchmark monitoring (2021 MSGP Part 4.2.2 and relevant requirements in Part 8 and/or Part 9);
- Effluent limitations guidelines monitoring (2021 MSGP Part 4.2.3 and relevant requirements in Part 8);
- State- or tribal-specific monitoring (2021 MSGP Part 4.2.4 and relevant requirements in Part 9);
- Impaired waters monitoring (2021 MSGP Part 4.2.5); and
- Other monitoring as required by EPA (2021 MSGP Part 4.2.6).

Depending on the type of facility you operate, and the monitoring requirements to which you are subject, you must collect and analyze stormwater samples and document monitoring activities consistent with the procedures described in 2021 MSGP Part 6 and Appendix B, Subsections 10 – 12, and any additional sector-specific or state/tribal-specific requirements in 2021 MSGP Parts 8 and 9, respectively. Refer to 2021 MSGP Part 7 for reporting and recordkeeping requirements. *Note: All monitoring must be conducted in accordance with the relevant sampling and analysis requirements at 40 CFR Part 136*. Include in your description procedures for ensuring compliance with these requirements.

If you are invoking the exception for inactive and unstaffed sites for benchmark monitoring, you must include in your SWPPP the information to support this claim as required by 2021 MSGP Part 6.2.1.3.

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

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

Check the following monitoring activities applicable to your facility:

☐ Indicator monitoring

☒ Benchmark monitoring

☐ Effluent limitations guidelines monitoring

☐ State- or tribal-specific monitoring

☐ Impaired waters monitoring

☐ Other monitoring required by EPA

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

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

Quarterly Benchmark Monitoring

1. **Sample location(s).** Outfalls 001 (002 is identical to 001); 003; 004 (005 is identical to 004); 006; 007 (008 is identical to 007)
2. **Pollutants to be sampled**. Subsector AA1: Total Recoverable Aluminum, sampling frequency once per quarter for the first and fourth year; Total Recoverable Zinc (freshwater), sampling frequency once per quarter for the first and fourth year; Nitrate plus Nitrite Nitrogen, sampling frequency once per quarter for the first and fourth year. Subsector AA2: Total Recoverable Zinc (freshwater), sampling frequency once per quarter for the first and fourth year; Nitrate plus Nitrite Nitrogen, sampling frequency once per quarter for the first and fourth year
3. **Monitoring Schedules.** Monitoring will be conducted each calendar quarter for the first and fourth year of permit.
4. **Numeric Limitations**. Total Recoverable Aluminum, 1100 ug/L; Total Recoverable Zinc (freshwater), Hardness Dependent; Nitrate plus Nitrite Nitrogen, 0.68 mg/L

Freshwater Hardness Range	**Zinc** (mg/L)
0-24.99 mg/L	0.04
25-49.99 mg/L	0.05
50-74.99 mg/L	0.08
75-99.99 mg/L	0.11
100-124.99 mg/L	0.13
125-149.99 mg/L	0.16
150-174.99 mg/L	0.18
175-199.99 mg/L	0.20
200-224.99 mg/L	0.23
225-249.99 mg/L	0.25
250+ mg/L	0.26

5. **Procedures**. Samples for each outfall will be collected separately by a member of the Stormwater Pollution Prevention team per instructions of, and in containers supplied by, the testing laboratory; ESS Laboratory, Cranston, RI, will be used for analyses.

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

Exception for Inactive and Unstaffed Facilities (if applicable)

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

Exception for Substantially Identical Discharge Points (SIDP) (if applicable)

If you plan to use the SIDP exception for your quarterly visual assessment requirements in 2021 MSGP Part 3.2.4 or your indicator, benchmark, or impaired waters monitoring requirements in 2021 MSGP Parts 4.2.1, 4.2.2, and 4.2.5, respectively, include the following information here to substantiate your claim that these discharge points are substantially identical (2021 MSGP Part 6.2.5.3.d):

- Location of each SIDP: 002 is identical to 001; 005 is identical to 004; 008 is identical to 007
- List the general industrial activities conducted in the drainage area of each discharge point: 002 and 001 include industrial activities of plating and sand blasting; 005 and 004 include industrial activities of sand blasting, spray painting and drying; 008 and 007 include activities of storage, loading and unloading of customer products.
- List the control measures implemented in the drainage area of each discharge point: Control measures for 002 and 001 include paints and painting equipment are located indoors and not exposed to storm water, spill kits are located in Wastewater Treatment and Plating area, personnel are trained, dust collectors collect dust from blasting area, and spent blast media is bagged prior to disposal in dumpster, yard is swept; 005 and 004 include paints and painting equipment are located indoors and not exposed to storm water, spill kits are located in Galvanizing area, personnel are trained, dust collectors collect dust from blasting area, and spent blast media is bagged prior to disposal in dumpster; 008 and 007 include spill kits are located in Galvanizing area, personnel are trained, yard is swept.
- List the exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants via stormwater discharges: 001 and 002 include blasting media, customer product, empty drums; 003 not expected to be any materials; 004 and 005 include dumpster and spent blasting media; 006 include customer product; 007 and 008 include customer product and diesel.
- An estimate of the runoff coefficient of the drainage areas (low = under 40%; medium = 40 to 65%; high = above 65%): High
- Why the discharge points are expected to discharge substantially identical effluents: Discharge points are expected to discharge substantially identical effluents because they are in the same area and exposed to the same potential contamination.

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

5.1 Documentation Regarding Endangered Species Act (ESA) Listed Species and Critical Habitat Protection.

Instructions (see 2021 MSGP Part 6.2.6.1):

Include any documentation you have that supports your determination of eligibility consistent with 2021 MSGP, Part 1.1.4 (Eligibility Related to Endangered Species Act (ESA) Listed Species and Critical Habitat Protection). Refer to Appendix E of the 2021 MSGP for specific instructions for establishing eligibility.

See attached letters.

MA Documentation Letter_ Northern Lor

Species List_ New England Ecological S

5.2 Documentation Regarding National Historic Preservation Act (NHPA)-Protected Properties.

Instructions (see 2021 MSGP Part 6.2.6.2):

Include any documentation you have that supports your determination of eligibility consistent with 2021 MSGP Part 1.1.5 (Eligibility related to National Historic Preservation Act (NHPA)-Protected Properties). Refer to 2021 MSGP, Appendix F for specific instructions for establishing eligibility.

Coverage under this permit is available under Criterion A.

Criterion A. Your 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.

SECTION 6: CORRECTIVE ACTIONS AND ADDITIONAL IMPLEMENTATION MEASURES

Instructions (see 2021 MSGP Part 5):

Describe the procedures for taking corrective action and/or AIM response in compliance with Part 5 of the 2021 MSGP.

Corrective Actions and Additional Implementation Measures (AIM)

6.1 Corrective Action

6.1.1 Conditions Requiring SWPPP Review and Revision to Ensure Effluent Limits are Met.

When any of the following conditions occur or are detected during an inspection, monitoring or other means, or EPA or the operator of the MS4 through which Duncan Galvanizing Corp. (DGC) discharges informs DGC that any of the following conditions have occurred, DGC will review and revise, as appropriate, its SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of DGC's stormwater control measures) so that this permit's effluent limits are met and pollutant discharges are minimized:

6.1.1.1 An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the United States) occurs at DGC's facility.

6.1.1.2 A discharge violates a numeric effluent limit listed in Table 2-1 and/or in DGC's Part 8 sector-specific requirements. 2021 MSGP Permit Parts 1-7

6.1.1.3 DGC's stormwater control measures are not stringent enough for DGC's stormwater discharge to be controlled as necessary such that the receiving water of the United States will meet applicable water quality standards or to meet the non-numeric effluent limits in this permit.

6.1.1.4 A required control measure was never installed, was installed incorrectly, or not in accordance with Parts 2 and/or 8 or is not being properly operated or maintained.

6.1.1.5 Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

6.1.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Necessary.

If construction or a change in design, operation, or maintenance at DGC's facility occurs that significantly changes the nature of pollutants discharged via stormwater from DGC's facility, or significantly increases the quantity of pollutants discharged, DGC will

review its SWPPP (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation and implementation of DGC's stormwater control measures) to determine if modifications are necessary to meet the effluent limits in this permit.

6.1.3 Deadlines for Corrective Actions

6.1.3.1 Immediate Actions.

DGC will immediately take all reasonable steps to minimize or prevent the discharge of pollutants until you can implement a permanent solution, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.

> In Part 5, the term "immediately" means that the day you find a condition requiring corrective action, you must take all reasonable steps to minimize or prevent the discharge of pollutants until you can implement a permanent solution. However, if you identify a problem too late in the workday to initiate corrective action, you must perform the corrective action the following workday morning. The term "all reasonable steps" means you must respond to the conditions triggering the corrective action, such as cleaning up any exposed materials that may be discharged in a storm event (e.g., through sweeping, vacuuming) or making arrangements (i.e., scheduling) for a new SCM to be installed.

6.1.3.2 Subsequent Actions.

If additional actions are necessary beyond those implemented pursuant to Part 6.1.3.1, DGC will complete the corrective actions (e.g., install a new or modified control and make it operational, complete the repair) before the next storm event if possible, and within 14 calendar days from the time of discovery that the condition in Part 5.1.1 is not met. If it is infeasible to complete the corrective action within 14 calendar days, you must document why it is infeasible to complete the corrective action within the 14-day timeframe. DGC will also identify its schedule for completing the work, which must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. If the completion of corrective action will exceed the 45-day timeframe, DGC may take the minimum additional time necessary to complete the corrective action, provided that it notifies the appropriate EPA Regional Office of its intention to exceed 45 days, its rationale for an extension, and a completion date, which DGC will also include in its corrective action documentation (see Part 5.3). Where the corrective actions result in changes to any of the controls or procedures documented in DGC's SWPPP, it will modify its SWPPP accordingly within 14 calendar days of completing corrective action work. These time intervals are not grace periods, but are schedules considered reasonable for documenting any findings and for making repairs and improvements. They are 2021 MSGP Permit Parts 1-7 included in this permit to ensure that the conditions prompting the need for these repairs and improvements do not persist indefinitely.

6.1.4 Effect of Corrective Action.

6.1.5 Substantially Identical Discharge Points.

If the event triggering corrective action is associated with a discharge point that had been identified as a "substantially identical discharge point" (SIDP) (see Parts 3.2.4.5 and 4.1.1), DGC's review will assess the need for corrective action for all related SIDPs. Any necessary changes to control measures that affect these other discharge points

must also be made before the next storm event if possible, or as soon as practicable following that storm event. Any corrective actions must be conducted within the timeframes set forth in Part 5.1.3.

6.2 Additional Implementation Measures (AIM)

If any of the following AIM triggering events in Parts 5.2.3, 5.2.4, or 5.2.5 occur, DGC must follow the response procedures described in those parts, called "additional implementation measures" or "AIM." There are three AIM levels: AIM Level 1, Level 2, and Level 3. DGC will respond as required to different AIM levels which prescribe sequential and increasingly robust responses when a benchmark exceedance occurs. DGC will follow the corresponding AIM level responses and deadlines described in Parts 5.2.1, 5.2.2, and 5.2.3.

6.2.1 Baseline Status

Once DGC receives discharge authorization under this permit per Part 1.3, DGC is in a baseline status for all applicable benchmark parameters. If an AIM triggering event occurs and DGC has proceeded sequentially to AIM Level 1, 2 or 3, it may return directly to baseline status once the corresponding AIM-level response and conditions are met.

6.2.2 AIM Triggering Events.

If an annual average exceeds an applicable benchmark threshold based on the following events, the AIM requirements have been triggered for that benchmark parameter. DGC will follow the corresponding AIM-level responses and deadlines described in Parts 5.2.3, 5.2.4, and 5.2.5. An annual average exceedance for a parameter can occur if:

6.2.2.1 The four-quarterly annual average for a parameter exceeds the benchmark threshold, or

6.2.2.2 Fewer than four quarterly samples are collected, but a single sample or the sum of any sample results within the sampling year exceeds the benchmark threshold by more than four times for a parameter. This result indicates an exceedance is mathematically 2021 MSGP Permit Parts 1-7 certain (i.e., the sum of quarterly sample results to date is already more than four times the benchmark threshold).

6.2.3 AIM Level 1

DGC's status changes from baseline to AIM Level 1 if quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred.

6.2.3.1 AIM Level 1 Responses.

If any of the triggering events in Part 5.2.2 occur, DGC will:

a. Review SWPPP/Stormwater Control Measures. Immediately review its SWPPP and the selection, design, installation, and implementation of its stormwater control measures to ensure the effectiveness of your existing measures and determine if modifications are necessary to meet the benchmark threshold for the applicable parameter,19 and

b. Implement Additional Measures. After reviewing DGC's SWPPP/stormwater control measures, DGC will implement additional measures, considering good engineering practices, that would reasonably be expected to bring its exceedances below the parameter's benchmark threshold; or if it determine nothing further needs to be done with your stormwater control measures, it must document per Part 5.3 and include in DGC's annual report why it expect its existing control measures to bring your exceedances below the parameter's benchmark threshold for the next 12-month period. 18 For pH, an annual average exceedance can only occur if the four-quarter annual average exceeds the benchmark threshold. Examples may include review sources of pollution,

spill and leak procedures, and/or non-stormwater discharges; conducting a single comprehensive clean-up, making a change in subcontractor, implementing a new control measure, and/or increasing inspections.

6.2.3.2 AIM Level 1 Deadlines.

If any modifications to or additional control measures are necessary in response to AIM Level 1, you must implement those modifications or control measures within 14 days of receipt of laboratory results, unless doing so within 14 days is infeasible. If doing so within 14 days is infeasible, DGC will document per Part 5.3 why it is infeasible and implement such modifications within 45 days.

6.2.3.3 Continue Quarterly Benchmark Monitoring.

After compliance with AIM Level 1 responses and deadlines, DGC will continue quarterly benchmark monitoring for the next four quarters for the parameter(s) that caused the AIM triggering event at all affected stormwater discharge points, beginning no later than the next full quarter after compliance.

6.2.3.4 AIM Level 1 Status Update.

While in AIM Level 1 status, DGC will either:

a. Return to Baseline Status. DGC's AIM Level 1 status will return to baseline status if the AIM Level 1 responses have been met and continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has not occurred after four quarters of monitoring (i.e., the benchmark threshold is no longer exceeded for the parameter(s)). DGC may discontinue benchmark monitoring for that parameter until monitoring resumes in year 4 of permit coverage per Part 4.2.2.3 or if it has fulfilled all benchmark monitoring 2021 MSGP Permit Parts 1-7 requirements per Part 4.2.2.3, then DGC may discontinue monitoring for that parameter for the remainder of the permit.

b. Advance to AIM Level 2. Your AIM Level 1 status advances to AIM Level 2 status if DGC has completed AIM Level 1 responses and the continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred (i.e., the benchmark threshold continues to be exceeded for the same parameter(s)).

6.2.4 AIM Level 2

DGC's status changes from AIM Level 1 to AIM Level 2 if its continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred (i.e., the benchmark threshold continues to be exceeded for the parameter(s)).

6.2.4.1 AIM Level 2 Responses.

If any of the events in Part 5.2.2 occur, DGC will review its SWPPP and implement additional pollution prevention/good housekeeping SCMs, considering good engineering practices, beyond what it did in its AIM Level 1 responses that would reasonably be expected to bring its exceedances below the parameter's benchmark threshold. Refer to the MSGP sector-specific fact sheets for recommended controls found at [https://www.epa.gov/npdes/stormwater-dischargesindustrial-activities-fact-sheets-and-guidance].

6.2.4.2 AIM Level 2 Deadlines.

DGC will implement additional pollution prevention/good housekeeping SCMs within 14 days of receipt of laboratory results that indicate an AIM triggering event has occurred and document per Part 5.3 how the measures will achieve benchmark thresholds. If it is feasible for DGC to implement a measure, but not within 14 days, it may take up to 45

days to implement such measure. DGC will document per Part 5.3 why it was infeasible to implement such measure in 14 days. EPA may also grant DGC an extension beyond 45 days, based on an appropriate demonstration by DGC, the operator.

6.2.4.3 Continue Quarterly Benchmark Monitoring.

After compliance with AIM Level 2 responses and deadlines, DGC must continue quarterly benchmark monitoring for the next four quarters for the parameter(s) that caused the AIM triggering event at all affected discharge points, beginning no later than the next full quarter after compliance.

6.2.4.4 AIM Level 2 Status Update.

While in AIM Level 2 status, DGC may either:

a. Return to Baseline Status. DGC's AIM Level 2 status will return to baseline status if the AIM Level 2 responses have been met and the continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has not occurred after four quarters of monitoring (i.e., the benchmark threshold is no longer exceeded for the parameter(s)). DGC may discontinue benchmark monitoring for that parameter until monitoring resumes in year 4 of permit coverage per Part 4.2.2.3, or if it has fulfilled all benchmark monitoring requirements per Part 4.2.2.3, then DGC may discontinue monitoring for that parameter for the remainder of the permit.

b. Advance to AIM Level 3. DGC's AIM Level 2 status advances to AIM Level 3 status if it has completed the AIM Level 2 responses and the continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 2021 MSGP Permit Parts 1-7 has occurred (i.e., the benchmark threshold continues to be exceeded for the same parameter(s)).

6.2.5 AIM Level 3

DGC's status changes from AIM Level 2 to AIM Level 3 if its continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred (i.e., the benchmark threshold continues to be exceeded for the parameter(s)).

6.2.5.1 AIM Level 3 Responses.

If any of the triggering events in Part 5.2.2 occur, DGC will assess its ability to install structural source controls (e.g., permanent controls such as permanent cover, berms, and secondary containment), and/or treatment controls (e.g., sand filters, hydrodynamic separators, oil-water separators, retention ponds, and infiltration structures). The controls or treatment technologies or treatment train DGC installs should be appropriate for the pollutants that triggered AIM Level 3 and should be more rigorous than the pollution prevention/good housekeeping-type stormwater control measures implemented under AIM Tier 2 in Part 5.2.4. DGC will select controls with pollutant removal efficiencies that are sufficient to bring its exceedances below the benchmark threshold. DGC will install such stormwater control measures for the discharge point(s) in question and for substantially identical discharge points (SIDPs), unless it individually monitors those SIDPs and demonstrate that AIM Level 3 requirements are not triggered at those discharge points.

6.2.5.2 AIM Level 3 Deadlines.

DGC will identify the schedule for installing the appropriate structural source and/or treatment stormwater control measures within 14 days and install such measures within 60 days. If is not feasible within 60 days, it may take up to 90 days to install such measures, documenting in DGC's SWPPP per Part 5.3 why it is infeasible to install the

measure within 60 days. EPA may also grant DGC an extension beyond 90 days, based on an appropriate demonstration by you, the operator.

6.2.5.3 Continue Quarterly Benchmark Monitoring.

After compliance with AIM Level 3 responses and deadlines, DGC will continue quarterly benchmark monitoring for the next four quarters for the parameter(s) that caused the AIM triggering event at all affected discharge points, beginning no later than the next full quarter after compliance.

6.2.5.4 AIM Level 3 Status Update.

While in AIM Level 3 status, DGC may either:

a. Return to Baseline Status. DGC's AIM Level 3 status will return to baseline status if the AIM Level 3 response(s) have been met and the continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has not occurred after four quarters of monitoring (i.e., the benchmark threshold is no longer exceeded for the parameter(s)). DGC may discontinue benchmark monitoring for that parameter until monitoring resumes in what would be year 4 of permit coverage per Part 4.2.2.3, or if it has fulfilled all benchmark monitoring requirements per Part 4.2.2.3, then it may discontinue monitoring for that parameter for the remainder of the permit.

b. Continue in AIM Level 3. DGC's AIM Level 3 status will remain at Level 3 if it has completed the AIM Level 3 responses and the continued quarterly benchmark monitoring results indicate that an AIM triggering event per Part 5.2.2 has occurred (i.e., the benchmark threshold continues to be exceeded for the same parameter(s)). DGC will continue quarterly benchmark monitoring for the next 2021 MSGP Permit Parts 1-7 four quarters for the parameter(s) that caused the AIM triggering event at all affected discharge points, beginning no later than the next full quarter after compliance. If it continues to exceed the benchmark threshold for the same parameter even after compliance with AIM Level 3, EPA may require DGC to apply for an individual permit.

6.3 Corrective Action and AIM Documentation

6.3.1 Documentation within 24 Hours. DGC will document the existence of any of the conditions listed in Parts 5.1.1, 5.2.3, 5.2.4, or 5.2.5 within 24 hours of becoming aware of such condition. DGC is not required to submit this documentation to EPA, unless specifically required or requested to do so. However, DGC will summarize its findings in the annual report per Part 7.4. Include the following information in its documentation:

6.3.2 Description of the condition or event triggering the need for corrective action review and/or AIM response. 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 United States, through stormwater or otherwise;

6.3.2.1 Date the condition/triggering event was identified;

6.3.2.2 Description of immediate actions taken pursuant to Part 5.1.3.1 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 Part 2.1.2.4); and

6.3.2.3 A statement, signed and certified in accordance with Appendix B, Subsection 11.

6.3.3 Documentation within 14 Days. DGC will also document the corrective actions and/or AIM responses it took or will take as a result of the conditions listed in Part 5.1.1, 5.2.3, 5.2.4, and/or

5.2.5 within 14 days from the time of discovery of any of those conditions/triggering events. Provide the dates when you initiated and completed (or expect to complete) each corrective action and/or AIM response. If infeasible to complete the necessary corrective actions and/or AIM responses within the specified timeframe, per Parts 5.1.1, 5.2.3, 5.2.4, or 5.2.5, DGC will document its rationale and schedule for installing the controls and making them operational as soon as practicable after the specified timeframe. If DGC notifies EPA regarding an allowed extension of the specified timeframe, it will document its rationale for an extension. Include any additional information and/or rationale that is required and/or applicable to the specified corrective action and/or AIM response in Part 5. DGC is not required to submit this documentation to EPA, unless specifically required or 2021 MSGP Permit Parts 1-7 requested to do so. However, DGC will summarize its corrective actions and/or AIM responses in the Annual Report per Part 7.4.

SECTION 7: SWPPP CERTIFICATION

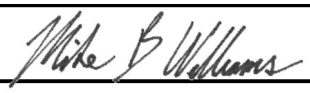
Instructions (see 2021 MSGP Part 6.2.7):

The following certification statement must be signed and dated by a person who meets the requirements of Appendix B, Subsection 11.A, of the 2021 MSGP.

Note: this certification must be re-signed in the event of a SWPPP modification in response to a Part 5.1 trigger for corrective action or a Part 5.2 AIM triggering event.

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 contained therein. 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: Michael Williams Title: President

Signature:  Date: 05/28/2021

SECTION 8: SWPPP MODIFICATIONS

Instructions (see 2021 MSGP Part 6.3):

Your SWPPP is a "living" document and is required to be modified and updated, as necessary, in response to corrective actions and deadlines. See Part 5 of the 2021 MSGP.

- If you need to modify the SWPPP in response to a corrective action required by Part 5.1 or AIM required by Part 5.2 of the 2021 MSGP, then the certification statement in section 7 of this SWPPP template must be re-signed in accordance with 2021 MSGP Appendix B, Subsection 11.A.
- For any other SWPPP modification, you should keep a log with a description of the modification, the name of the person making it, and the date and signature of that person. See 2021 MSGP Appendix B, Subsection 11.C.

SECTION 9: SWPPP AVAILABILITY

Instructions (see 2021 MSGP Part 6.4):

Your current SWPPP (with the exception of any confidential business or restricted information) must be made available to the public. You have three options to comply with the public availability requirements for the SWPPP: attaching your SWPPP to your NOI; providing a URL of your SWPPP in your NOI; or providing the following SWPPP information in your NOI:

- Onsite industrial activities exposed to stormwater, including potential spill and leak areas;
- Pollutants or pollutant constituents associated with each industrial activity exposed to stormwater that could be discharged in stormwater and/or any authorized non-stormwater discharges;
- Stormwater control measures you employ to comply with the non-numeric technology-based effluent limits and any other measures taken to comply with the water quality based effluent limits; and
- Schedule for good housekeeping and maintenance and schedule for all inspections.

SWPPP ATTACHMENTS

Attach the following documentation to the SWPPP:

Attachment A – General Location Map

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

Attachment B – Site Map

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

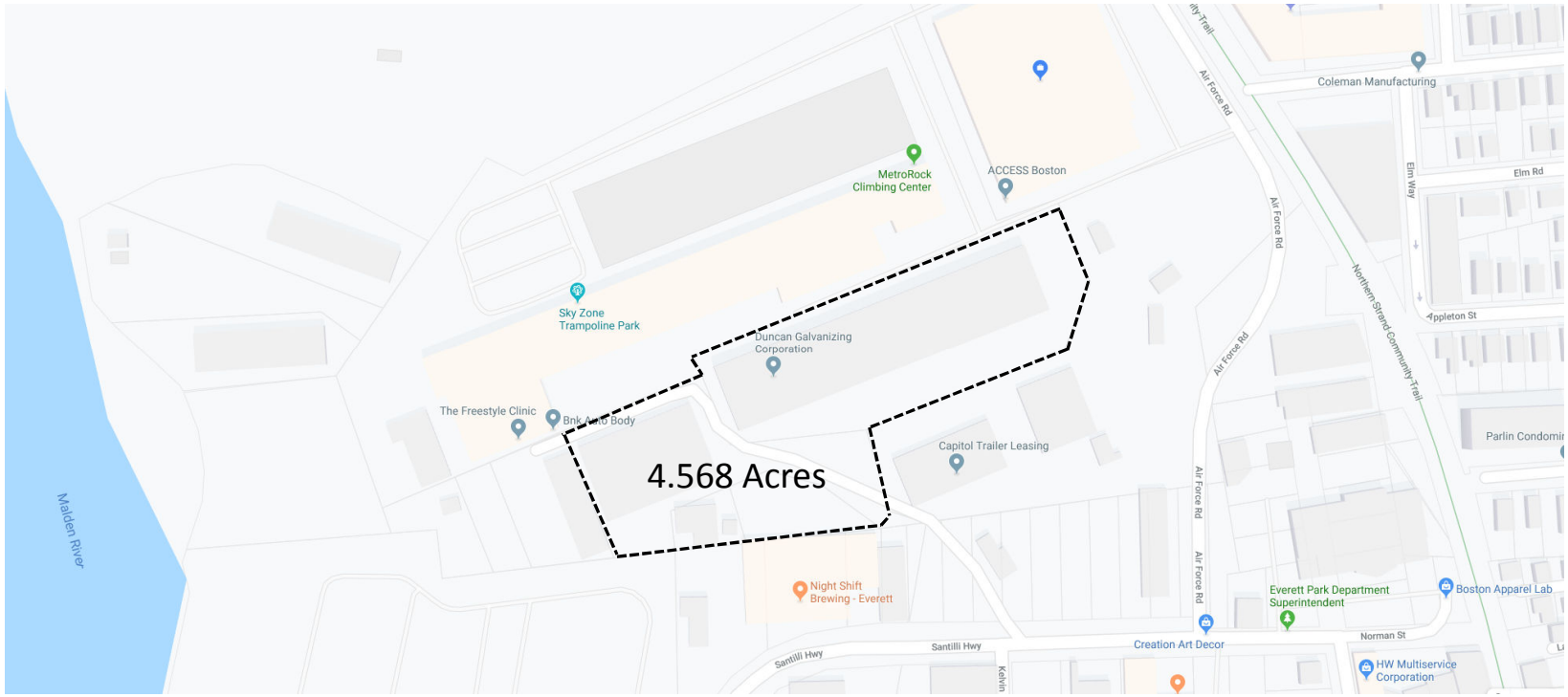
Attachment C –2021 MSGP

Note: it is helpful to keep a printed-out copy of the 2021 MSGP so that it is accessible to you for easy reference. However, you do not need to formally incorporate the entire 2021 MSGP into your SWPPP. As an alternative, you can include a reference to the permit and where it is kept at the site.

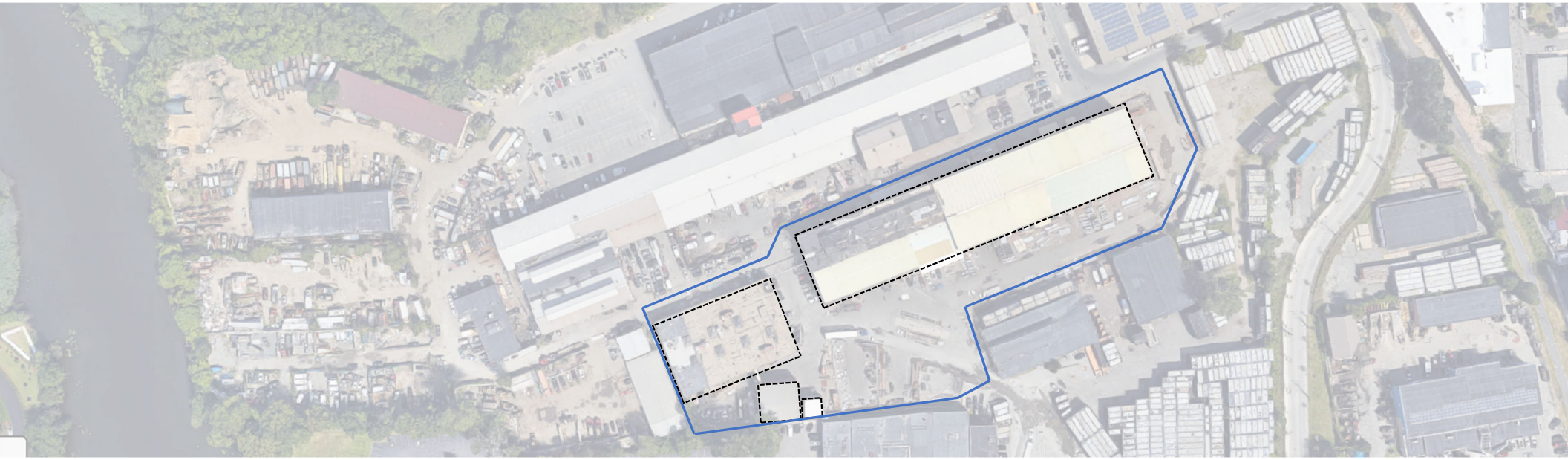
Attachment A - General Location Map

Attachment B – Site Map

- Boundaries of the property and the size of the property in acres.

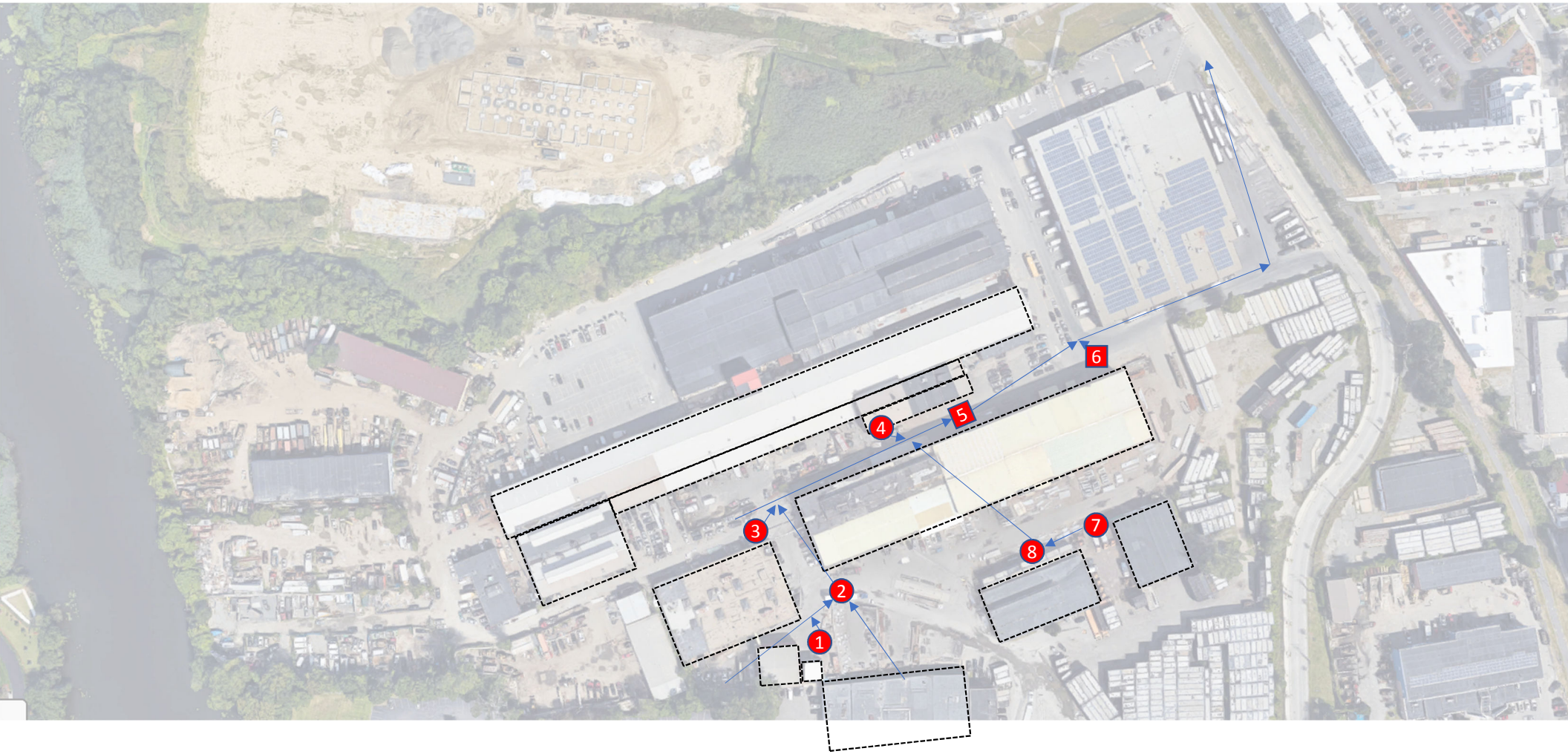


- Location and extent of significant structures and impervious surfaces

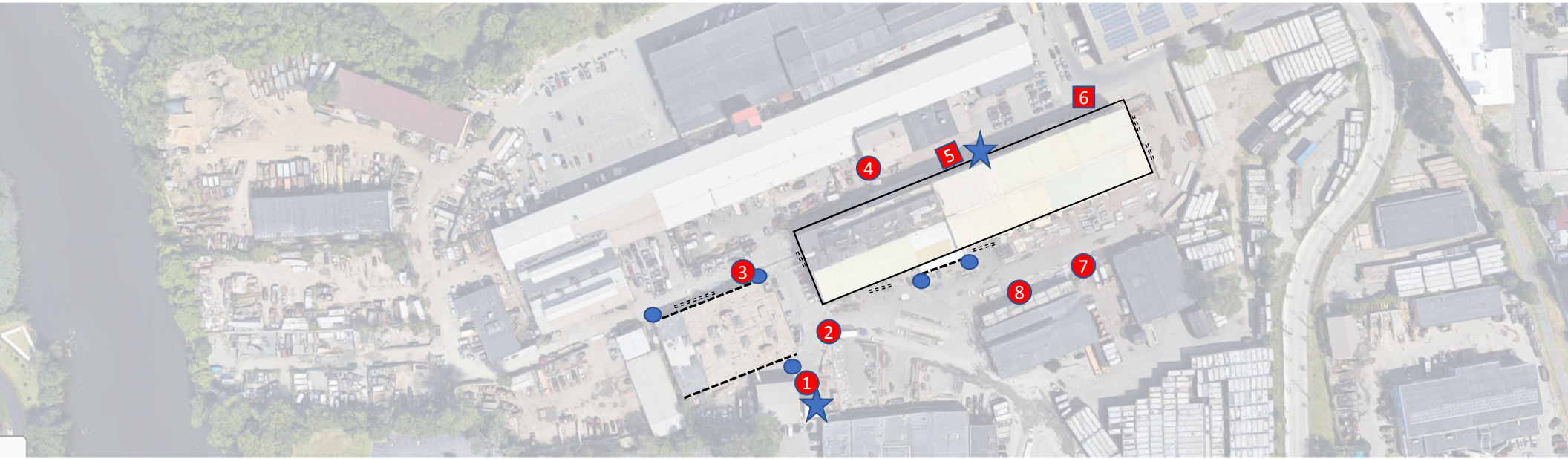


Entire property is impervious surfaces (buildings additionally shown)

- Direction of stormwater flow



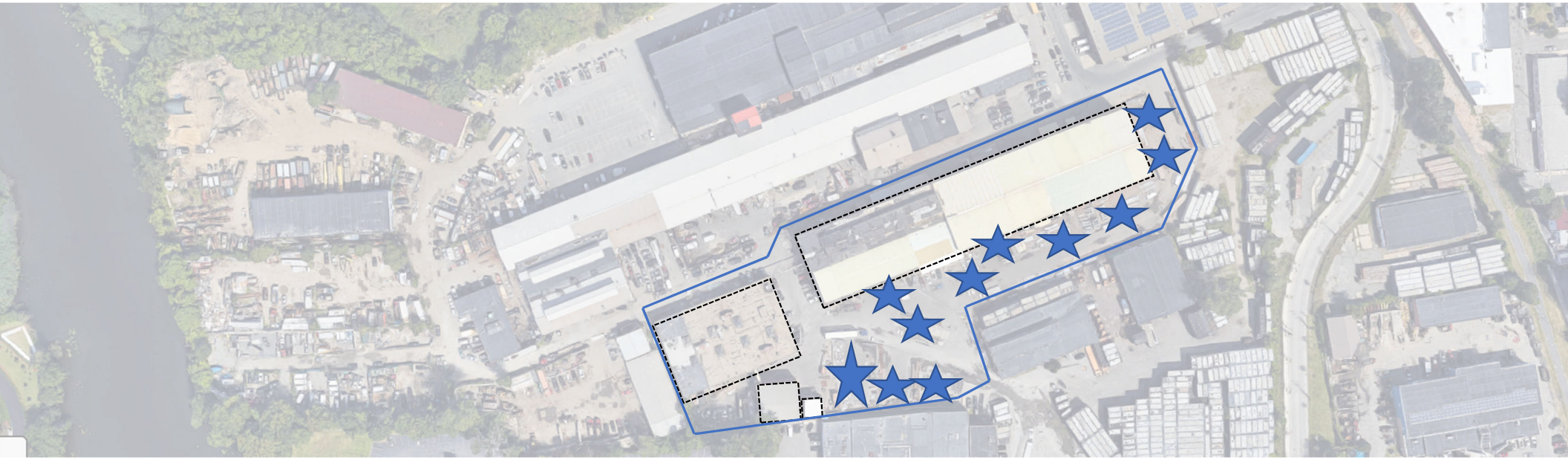
- Locations of all stormwater control measures



-------- gutters
gutters downspouts
raised facility entrances
yard sweeping everywhere on outdoor property
plant sweeping everywhere in outlined plant
spent media disposal dust controls
2 S4 catch basin maintenace

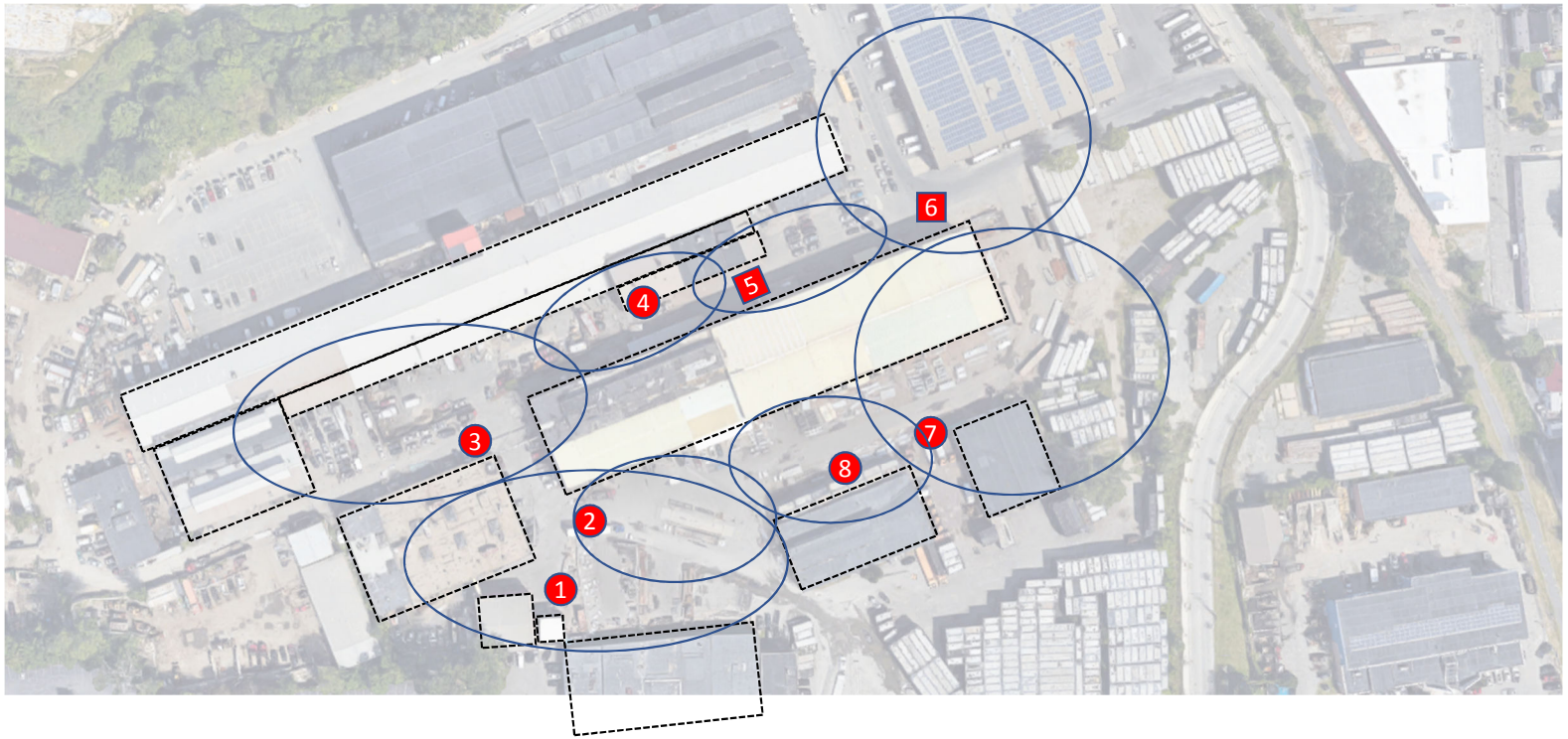
- Locations of all receiving waters

- Location of potential pollutant sources

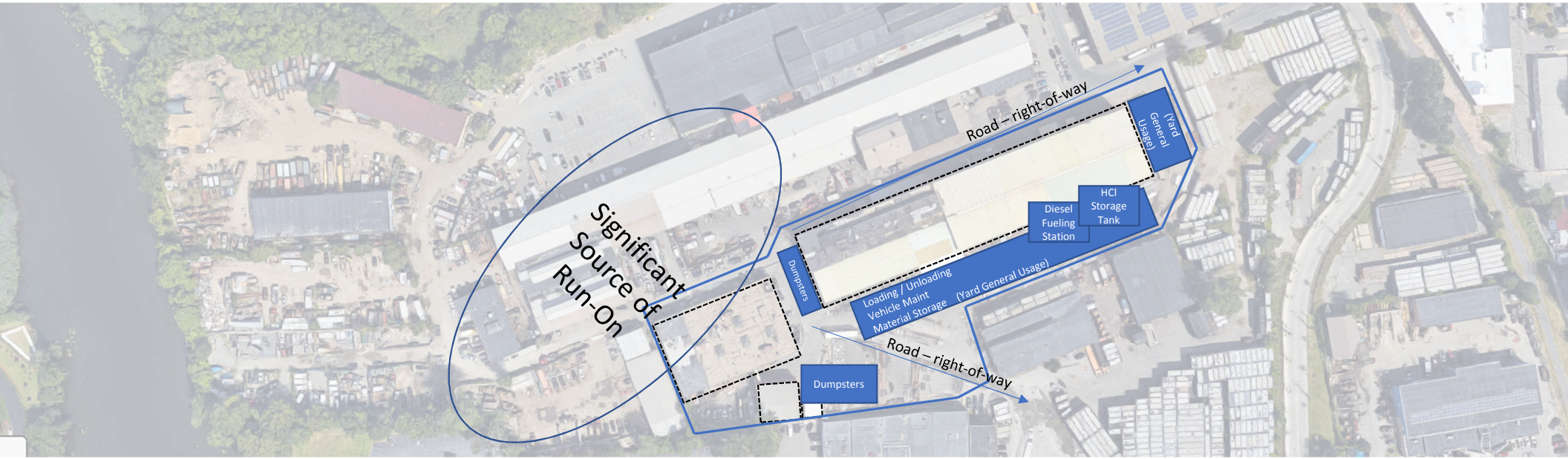


Location of zinc and iron potential sources

- Location of stormwater inlets and discharge points and an approximate outline of the areas draining to each discharge point

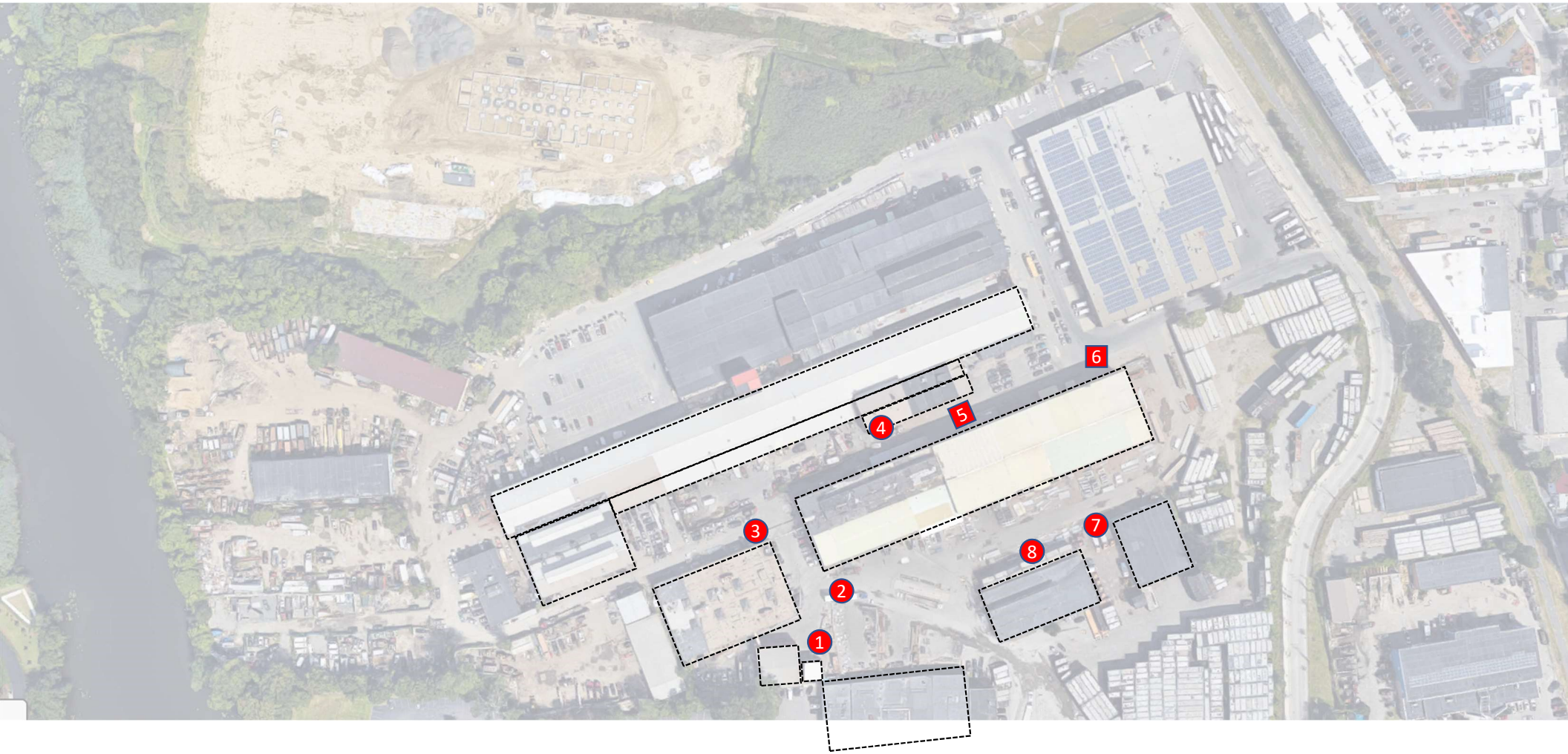


- Locations of requested activities exposed to precipitation



- Location of all stormwater conveyances – not applicable
- Locations where significant spills or leaks have occurred – not applicable
- Areas of designated critical habitat for endangered or threatened species – not applicable

- Locations of stormwater monitoring points



United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
http://www.fws.gov/newengland

In Reply Refer To: May 25, 2021
Consultation Code: 05E1NE00-2021-SLI-3499
Event Code: 05E1NE00-2021-E-10513
Project Name: MSGP

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
(603) 223-2541

Project Summary

Consultation Code: 05E1NE00-2021-SLI-3499
Event Code: 05E1NE00-2021-E-10513
Project Name: MSGP
Project Type: ** OTHER **
Project Description: Storm Water permit
Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@42.406893999999994,-71.06776363810822,14z

Counties: Middlesex County, Massachusetts

Endangered Species Act Species

There is a total of 0 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

---

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
http://www.fws.gov/newengland

IPaC Record Locator: 613-102404931 May 25, 2021

Subject: Consistency letter for the 'MSGP' project indicating that any take of the northern long-eared bat that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o).

Dear CALVIN PATTEN:

The U.S. Fish and Wildlife Service (Service) received on May 25, 2021 your effects determination for the 'MSGP' (the Action) using the northern long-eared bat (*Myotis septentrionalis*) key within the Information for Planning and Consultation (IPaC) system. You indicated that no Federal agencies are involved in funding or authorizing this Action. This IPaC key assists users in determining whether a non-Federal action may cause "take"[1] of the northern long-eared bat that is prohibited under the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based upon your IPaC submission, any take of the northern long-eared bat that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o). Unless the Service advises you within 30 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that the Action is not likely to result in unauthorized take of the northern long-eared bat.

Please report to our office any changes to the information about the Action that you entered into IPaC, the results of any bat surveys conducted in the Action area, and any dead, injured, or sick northern long-eared bats that are found during Action implementation.

If your Action proceeds as described and no additional information about the Action's effects on species protected under the ESA becomes available, no further coordination with the Service is required with respect to the northern long-eared bat.

---

[1]Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct [ESA Section 3(19)].

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

MSGP

2. Description

The following description was provided for the project 'MSGP':

Malden River

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@42.40187095,-71.07359094695121,14z

Determination Key Result

This non-Federal Action may affect the northern long-eared bat; however, any take of this species that may occur incidental to this Action is not prohibited under the final 4(d) rule at 50 CFR §17.40(o).

Determination Key Description: Northern Long-eared Bat 4(d) Rule
This key was last updated in IPaC on **May 15, 2017**. Keys are subject to periodic revision.

This key is intended for actions that may affect the threatened northern long-eared bat.

The purpose of the key for non-Federal actions is to assist determinations as to whether proposed actions are excepted from take prohibitions under the northern long-eared bat 4(d) rule.

If a non-Federal action may cause prohibited take of northern long-eared bats or other ESA-listed animal species, we recommend that you coordinate with the Service.

Determination Key Result

Based upon your IPaC submission, any take of the northern long-eared bat that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o).

Qualification Interview

1. Is the action authorized, funded, or being carried out by a Federal agency?

   No

2. Will your activity purposefully **Take** northern long-eared bats?

   No

3. [Semantic] Is the project action area located wholly outside the White-nose Syndrome Zone?

   Automatically answered
   No

4. Have you contacted the appropriate agency to determine if your project is near a known hibernaculum or maternity roost tree?

   Location information for northern long-eared bat hibernacula is generally kept in state Natural Heritage Inventory databases – the availability of this data varies state-by-state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited. A web page with links to state Natural Heritage Inventory databases and other sources of information on the locations of northern long-eared bat roost trees and hibernacula is available at www.fws.gov/midwest/endangered/mammals/nleb/nhisites.html.

   Yes

5. Will the action affect a cave or mine where northern long-eared bats are known to hibernate (i.e., hibernaculum) or could it alter the entrance or the environment (physical or other alteration) of a hibernaculum?

   No

6. Will the action involve Tree Removal?

   No

Project Questionnaire

If the project includes forest conversion, report the appropriate acreages below. Otherwise, type '0' in questions 1-3.

1. Estimated total acres of forest conversion:

0

2. If known, estimated acres of forest conversion from April 1 to October 31

0

3. If known, estimated acres of forest conversion from June 1 to July 31

0

If the project includes timber harvest, report the appropriate acreages below. Otherwise, type '0' in questions 4-6.

4. Estimated total acres of timber harvest

0

5. If known, estimated acres of timber harvest from April 1 to October 31

0

6. If known, estimated acres of timber harvest from June 1 to July 31

0

If the project includes prescribed fire, report the appropriate acreages below. Otherwise, type '0' in questions 7-9.

7. Estimated total acres of prescribed fire

0

8. If known, estimated acres of prescribed fire from April 1 to October 31

0

9. If known, estimated acres of prescribed fire from June 1 to July 31

0

If the project includes new wind turbines, report the megawatts of wind capacity below. Otherwise, type '0' in question 10.

10. What is the estimated wind capacity (in megawatts) of the new turbine(s)?

0