### Pepin Steel & Iron Works, LLC

## Storm Water Monitoring Plan

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Prepared for:
Pepin Steel & Iron Works, LLC
43 Waterbury Rd.
Bristol, CT 06010

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#### 1.0 INTRODUCTION

This is the Storm Water Pollution Prevention Plan (SWPPP) for Pepin Steel & Iron Works, LLC located at 43 Waterbury Rd. in Bristol, Connecticut. The facility's primary Standard Industrial Classification (SIC) is 3441. The facility has registered for coverage under a General Permit for the Discharge of Storm water Associated with Industrial Activity published by the Connecticut Department of Energy & Environmental Protection (CT DEEP) on October 1, 2002, as amended on July 15, 2003. A copy of the facility's Certificate of Registration is enclosed in Appendix 1. Pepin Steel and Iron Works will review and revise the SWPPP accordingly on an annual basis to keep the plan current.

#### 1.1 Goals of SWPPP

The goals of this SWPPP are:

- The prevention of pollution of surface waters that could result in toxicity to aquatic organisms, impair ecosystems, or create risk to human health
- The prevention of floating oil, scum, or similar non-natural substance produced by facility activities from entering surface waters.

#### 1.2 Scope of SWPPP

This SWPPP covers all of the requirements specified in the General Permit and provides a means of organizing related activities and records.

#### 1.3 General Responsibilities

Every employee of Pepin Steel & Iron Works, LLC is responsible for conducting daily activities in a manner consistent with this SWPPP. Specifically, each employee is to conduct work activities in such a way that:

- The yard is kept neat and picked up on a regular basis.
- No vehicle or equipment maintenance or cleaning is performed in the yard.
- No chemical, fuels, oils, solvents, paints or similar substances are poured onto the ground, catch basins, downspouts, or yard drains.
- No drums or pails are left outside unless they are empty and properly stored with the tops securely fastened.

#### 2.0 POLLUTION PREVENTION TEAM

The Pepin Steel & Iron Works, LLC pollution prevention team consists of one administrator and three members. The personnel presently assigned to the team and the activities for which they are responsible are listed in **Table 1**.

#### 3.0 POTENTIAL POLLUTANT SOURCES

#### 3.1 Surface Drainage

Figure 1 is a site map showing the drainage area for the site showing:

- A. CB-1 storm water catch basin draining to the Bristol municipal separate storm water system.
- B. CB-2- storm water catch basin which is connected to CB-1

#### The map includes:

- Location of all catch basins and storm drain lines on the property delineation of the portion of the site "associated with industrial activity" as defined in the General Permit
- Loading and unloading areas where materials or wastes are exposed to precipitation
- Arrows indicating approximate directions of surface runoff flow
- Storm water runoff control structures
- Location of materials stored outdoors and exposed to precipitation

Areas not indicated on the map due to nonexistence include:

- Areas where known leaks or spills of five (5) gallon or more have occurred in the past three years
- Areas used for treatment, storage or disposal of wastes
- Underground storage tanks
- Fueling stations
- Outdoor vehicle and equipment maintenance or cleaning areas

The area of the site that is "associated with industrial activity" as defined in the General Permit is limited to the building and the surrounding portions of property where steel is stored. This area is partially drained by sheet flow to a wooded area west of the building and partially drained by two catch basins. CB-1 is located at the northeastern edge of the property, alongside Waterbury Road. CB-2 is located in the southern part of the property and is connected to CB-1. The drainage area of CB-1 is approximately 74,000 square feet, with a runoff coefficient of .45. The catch basin discharges into the Bristol municipal separate storm water system (MS4). CB-1 is considered to capture runoff representative of industrial activity due to the surface runoff direction, its location on site and connections to roof drains and another catch basin (CB-2) on site.

#### 3.2 Inventory of Exposed Materials

Table 2 lists typical (non exposed) chemical inventory stored inside the facility only.

**Table 3** lists materials and areas allowed to be exposed to precipitation, both present materials and those stored or handled over the past three years. The list also includes, where applicable:

- Location and method of onsite disposal of materials
- Materials management practices to minimize storm water contact
- Existing control measures to reduce pollutants in runoff
- Description of any treatment to storm water

#### 3.3 History of Spills and Leaks

**Table 4** lists spills or leaks of five (5) gallons or more of a toxic or hazardous substance within the past three (3) years that had some potential to affect the quality of the storm water.

#### 3.4 Monitoring Program

Samples will be obtained twice annually by Pepin Steel & Iron Works, LLC. The samples will be collected from discharges resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours after any previous storm event of 0.1 inch or greater. Runoff events results from snow or ice can be used for monitoring. Grab samples will be obtained during the first 30 minutes of a storm event discharge. Samples will be obtained from CB-1. The uncontaminated rainfall pH will be measured. **Table 5** lists the parameters monitored at the representative discharge(s) of the facility and identifies the sampling points(s). **Table 6** is the data recording form used for sampling.

Storm water monitoring report forms and analytical results are archived in Tab Section 7. Semi-Annual monitoring is scheduled for early spring and late fall. Laboratory results are inserted in a report form provided by the CTDEP. All copies of the storm water monitoring report forms are then promptly forwarded to the CTDEP.

#### 3.5 Summary of Potential Pollutant Sources

Table 7 lists and describes potential pollutant sources at the facility, including:

- Loading and unloading areas where materials may be exposed to precipitation
- Outdoor storage activities and areas
- Outdoor manufacturing or material handling areas
- To the best of Pepin Steel & Iron Works, LLC 's knowledge, within the area associated with industrial activity, there have not been and are not presently:
  - 1. Processes that generate uncontrolled dust or particulate matter
  - 2. Areas that may have been used for waste disposal

#### 4.0 MEASURES AND CONTROLS

#### 4.1 Good Housekeeping

The following steps are followed to assure no pollutants from equipment maintenance activities enter the storm drain system:

- Any spills of lubricating or machining oils from process areas are cleaned up immediately
- Any change-outs of equipment fluids are performed indoors and any spills from these activities are cleaned up immediately
- All personnel are instructed that no substances may be poured or allowed to leak into the ground, catch basins, downspouts or yard drains (this

#### 4.1 Good Housekeeping (continued)

includes an instruction that no equipment or vehicle washing may be conducted in the yard).

- All personnel are instructed that no drums or pails may be stored outside unless they are confirmed empty and properly stored with their lids secured
- All personnel are reminded not to store any waste materials or surplus equipment in the yard without specific clearance from the Manager.
- All personnel are reminded not to sweep floors out the doorways into the yard.

#### 4.2 Preventive Maintenance

A preventive maintenance program is followed to assure that all facility equipment is properly maintained to reduce the possibility of pollutant releases into the storm drain system.

- Facility wide cleaning is performed on or before the last working day of the month.
- Unloading and loading zone is inspected monthly to verify no staining or odors are present.

The designated Equipment Inspector (Table 1) is responsible for implementing the preventative maintenance program on a monthly basis, using the checklist/reporting format in **Table 8**.

#### 4.3 Spill Prevention and Response Procedures

The following spill prevention and response procedures are in place to assure that the facility is capable of dealing with leaks or spills in an effective manner protective of surface waters:

- Procedures regarding minor spills contained inside the facility buildings are described in **Table 9**.
- Procedures regarding major spills or releases to the environment are described in **Table 10**.

#### 4.4 Inspections

The following facility inspection program is accomplished semi-annually to assure that the yard area is properly maintained to reduce the possibility of pollutant releases into the storm drain system:

- Catch basins are inspected for any floating scum, sheen or other visible problems attributable to facility operations.
- Spill control equipment is verified as being in place and adequate to potential needs.
- Building interiors are inspected to verify no conditions that could lead to spills to the outside or to the storm drain system.
- The yard is examined for any indications of oil spills or leaks/spills of any chemical liquids handled.

#### 4.4 Inspections (continued)

The designated Facility Inspector (Table 1) is responsible for implementing the facility inspection program semi-annually, using the checklist/reporting format in **Table 11**. These inspections should be made during rainfall events if possible.

Together with the monthly maintenance inspections of equipment (Table 8), this constitutes an ongoing and comprehensive evaluation of the site as required by the General Permit.

#### 4.5 Employee Training

Employee training is accomplished annually during the second quarter and covers the items listed in **Table 12** assure that all appropriate personnel:

- Understand the goals of the SWPPP
- Understand their role in maintaining a neat yard and operations area
- Know how to properly respond to and clean up spills

Employee training is documented on the recording portion of the training form (Table 12) after it is given. Training includes basic information about potential chemical spills and associated hazards. However, this training is only at the First Responder/Awareness level and not any higher level that would qualify personnel to be actively involved in an emergency response.

#### 4.6 Non-Storm Water Discharges

A professional engineer certification that no non-storm water discharges are occurring from the site has been completed and is located in section 5.

#### 4.7 Sediment and Erosion Control

Sediment and erosion control is accomplished via vegetated areas, gravel pads and on site catch basins which trap sediment.

#### 4.8 Management of Runoff

Based on inspection of the site and review of storm water runoff analysis, there is no present need to divert, infiltrate, store, reuse, treat or otherwise manage runoff at the site.

#### 5.0 Certifications

- 5.1 Non Storm Water Discharge Assessment (PE)
- 5.2 Non Storm Water Discharge Assessment Methodology Form
- 5.3 Plan Certification (PE)
- 5.4 Facility Authorization

#### 6.0 RECORDS

#### 6.1 List of Tables

- Table 1 Pollution Prevention Team
- Table 2 Materials Inventory
- Table 3 Inventories of Exposed Materials
- Table 4 Records of Spills
- Table 5 Parameters to be Monitoring and Sampling Points
- Table 6 Discharge Sampling Data Record
- Table 7 Summaries of Potential Pollutant Sources
- Table 8 Check List for Monthly Equipment Preventive Inspections
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#### 6.2 TAB Sections for completed forms and records.

- Tab 2: Copy of the Regulation
- Tab 3: Registered and Information Worksheets
- Tab 4: Comprehensive Site Inspections
- Tab 5: Monthly Site Inspections:
- Tab 6: Quarterly Visual Monitoring results
- Tab 7: Lab Reports and SMR Copies
- Tab 8: Training records

#### **Table 1 Pollution Prevention Team**

Person	<b>Position</b>	Responsibility
Allan Pepin	Managing Partner	Overall responsibility, Employee Training Facility Inspector
Kathy Pepin- Roussel	Managing Partner	Sampling and transport to the Laboratory. Inspection recordkeeping and reporting.
Don Cody	Foreman	Shop and Yard cleanliness Backup sampling and transport to the laboratory.

**Table 2 Chemicals Inventory** 

Chemical Type	Quantity (subject to change)	Location			
Paint	1-5 gallon pail 4-1 gallon cans	Paint Storage Area			
Primer	1-5 gallon pail	Paint Storage Area inside the facility			
Various Colors: Spray Paint Solvent based	15 Spray cans	Paint Storage Area inside the facility			
Belt Dressing	5 Spray cans	Paint Storage Area inside the facility			
Lubricants	6 Spray cans	Paint Storage Area inside the facility			
Aquanet Hair Spray	24 Spray cans	Paint Storage Area inside the facility			
Insecticide	2 Spray cans	Paint Storage Area inside the facility			
Hydraulic Oil	200 gallons	Inside production machine sumps, 55 gallon drums stored inside the facility			
· · · · · · · · · · · · · · · · · · ·					
7-17-18-1M-1M-1					

Table 3 Summary of Exposed Materials and Associated Controls

Our Confrol Measures used to		<u>T</u>	N/A N/A	CB-1 N/A	CB-1 Sediment removal provided by the catch basins; cleaned out as necessary	CB-1 N/A	CB-1 Sediment removal provided by the CB-2 catch basins; cleaned out as necessary	CB-1 Sediment removal provided by the catch basins; cleaned out as necessary	CB-1 Sediment removal provided by the catch basins; cleaned out as necessary	CB-1 Spill absorbent available, empty drums available. Regularly emptied by licensed contractor.
Variagement	Practices/Controls	Loading door; offloading is supervised; a spill kit is located in immediate vicinity of the door; the nearest catch basin is located approximately 150 feet away.	N/A	Dumpster is lidded and kept closed. Drain plugs are in place. Inspected routinely. Emptied regularly.	Boxes are to be covered except when adding material.  Inspected routinely. Emptied regularly.	Store indoors until removed from site via loading door. Controls in place as described above.	Slopes are stabilized with natural vegetation	Roll off box prevents scrap steel from contacting the ground. The box has a tight bottom and is placed on a concrete or gravel pad.  Boxes are to be covered except when adding steel.	Steel is primed or painted to prevent rusting.  Steel is stacked on blocks which help prevent ground contact.  Stored in a vegetated or gravel pad area.	Inspected Monthly. Located on a containment pallet.
		Indoors in manufacturing	N/A	Dumpster, on a concrete pad North portion of the property	Roll off box on the North side of the building	Indoors	N/A	Roll off box(s), outdoors on the south side of building	Outdoors on the south side of building	55 gallon drums stored inside the facility on a spill pallet
One of the few rest	to Stormwater	None	None	None	Contents of the box	None	Rear portion of the property	Various Pieces inside roll off box(s)	Several long pieces	None
	Source	Process Chemicals* (Paints, oil)	Roof Exhausts	Trash	Roll off Box for Construction and Demolition Waste	Empty containers	Erosion/Sediment from Steep Slopes	Recyclable Steel	Long steel awaiting pickup	Used oil

Note: Refer to Table 2 for typical quantities, and type of storage container for the materials.

# RECORD OF SPILLS OR LEAKS OVER 5 Gallons (list spills and leaks for the past 5 years)

Outfall Identifier:

CB-1

Outfall Drainage:

Roof of building; paved areas, yard

Materials Leaked	Constituents of material	Date of Leak or Spill:	Quantity Lost:	Cleanup Actions:
		•		
Late 1				
	and the state of t			

#### PARAMETERS TO BE MONITORED AND SAMPLING POINTS

Standard Storm Water Discharge Permit Parameters
(Monitored twice per storm water year unless exempted)

Parameter	Bottle	Preservative
Total Oil and Grease	1000 ml	Sulfuric Acid
	glass	pH<2
Chemical Oxygen Demand	Plastic	Sulfuric Acid
		pH<2
Total Suspended Solids	Plastic	None- Cool 4 <sup>oc</sup>
Total Phosphorous	Plastic	Sulfuric Acid
		pH<2
Total Kjeldahl Nitrogen	Plastic	Sulfuric Acid
		pH<2
Nitrate as Nitrogen	Plastic	None- Cool 4°C
Total Copper	Plastic	Nitric acid pH <2
Total Lead	Plastic	Nitric acid pH <2
Total Zinc	Plastic	Nitric acid pH <2
Aquatic Toxicity * 24 hr &48 hr	Plastic 1 Liter	None- Cool 4 <sup>oc</sup>
LC50		
рН	Plastic	None- test immediately

<sup>\*</sup> Monitored once per storm water year for the first two years of permit coverage

Direct Rainfall pH	Plastic	None- test immediately

Process Discharge Permit Parameters: None

Process Effluent Guideline Parameters: None

Bristol MS4 Parameters: Not established for this site, will include these upon request from the city of Bristol.

#### **Sampling Point**

Discharge Sampling Point	Associated with the discharge	Sampling point Description
CB-1	Site activities and outside steel storage. Bristol storm sewer system – Pequabuck river watershed area	Catch Basin in front of the building at the edge of the landscaped area on the property.

#### Sampling equipment:

Tool to lift catch basin grate, rope and clean bucket or bailer with rope (slide the bailer down through the grate), sample bottle kit for storm water, safety equipment.

#### PARAMETERS TO BE MONITORED AND SAMPLING POINTS

**Objective of Sampling:** To obtain a proper sample that accurately represents the storm water discharge from your site.

#### When to Sample:

- Due to the fact that some laboratory analysis for storm water are time sensitive, the best times to sample are during a late Sunday evening, Monday, Tuesday, Wednesday, or Thursday rainfall.
- Samples must be collected from discharges during a rainfall that is greater than **0.1**" in magnitude and that occurs **72 hours after** any previous storm of 0.1" or greater. For example, if it rained on Sunday and you did not take a sample, you will not be able to take a sample until at least Wednesday.
- All samples should be collected within 30 minutes from the time the water begins to flow from your discharge.

**SAFETY WARNING:** Some sample containers contain a small amount of chemical preservatives. These preservatives must not come into contact with your skin, eyes, or nose. Wear protective gloves and glasses during the sampling. In case of contact with the preservatives, flush with clean water for 15 minutes. Seek medical attention if eye contact occurs (after flushing your eyes) or is a rash develops. Keep all sample containers away from children.

CAUTION: Do not pour samples from one bottle to another as this will ruin your test results.

#### How to Sample:

- 1. When it begins to rain, open the container marked direct rainfall and place it where it can collect free falling rain. This sample must be marked rainfall pH. Test the pH on site and record the data.
- 2. As soon as water begins to flow at your point of discharge, carefully fill the remaining containers completely, making sure they do not overflow. Take steps To ensure you do not collect sand and other particles. As you fill each bottle, replace lid on securely. Test the pH on site and record the data.
- 3. Record the time and date of sampling on all your containers.
- 4. Fill out the chain of custody that has been provided and be sure to include your GSI# and your SIC number. (Facility information and Sampling information).
- 5. Cool the samples to 4 °C and transport them to the laboratory before 36 hours have expired.



#### Facility Information

# General Permit for the Discharge of Stormwater Associated with Industrial Activity, effective 10/1/2011 Stormwater Monitoring Report Form General Requirements and Sector G Transportation Facilities Only (Do not submit if you have other sector specific requirements)

,	
Permittee Name:S	ite Name:
Mailing Address:	
Contact Person:	
Business Phone:ext.:	
Site Address:	
Receiving Water (name/basin):	
Permit #: GSI Primary S	
Discharges into an Impaired Waterbody: Yes page 3 of this form)	
Sample Information	
Sample Location:	Person Collecting Sample:
Date/Time Collected: Da	' ' II
This report is for samples required: Other	Semi-annually 🔲 Annually 🔲
Check here if the sample contains snow or	ce melt:
Check here if a benchmark exceedance is so	olely due to background or off site sources

#### **Monitoring Results**

Parameter	Required Frequency	Results (units)	Benchmark	Benchmark Exceedance (see pg 4)	Test Method	Laboratory Name
Oil & Grease	Semi-annual		5.0 mg/L			
Rainfall pH	Semi-annual		n/a			
Sample pH	Semi-annual		5-9 SU			
COD	Semi-annual		75 mg/L			
TSS	Semi-annual		90 mg/L			
TP	Semi-annual		0.40 mg/L			
TKN	Semi-annual		2.30 mg/L			
NO <sub>3</sub> -N	Semi-annual		1.10 mg/L			
Total Copper	Semi-annual		0.059 mg/L			
Total Zinc	Semi-annual		0.160 mg/L			
Total Lead	Semi-annual		0.076 mg/L			
24 Hr. LC <sub>50</sub>	Annual-Year 1&2		n/a			
48 Hr. LC <sub>50</sub>	Annual-Year 1&2		n/a			

#### **Exemptions**

List here any parameter(s) that will not be sampled for the remainder of the permit term: see note below

**NOTE:** Complete the "Data Tracking Table" (page 4 on this form) to show the parameter is eligible for the monitoring exemption in Section 5(e)(1)(B)(iii) of the general permit. If you are discontinuing monitoring for impaired water parameters (per Section 5(e)(1)(D)), or parameters that are present due to natural or background levels or off site run-on (per Section 5(e)(1)(B)(V)), attach additional supporting information to this form.

#### STORMWATER ACUTE TOXICITY TEST DATA SHEET

(required annually only during Year 1 and Year 2 of the permit)

Site Name:	
Date/Time Begin:	Date/Time End:
Sample Hardness:	Sample Conductivity:
Test Species: <i>Daphnia pulex</i> < 24 hrs old	Dilution Water Hardness:

Effluent Dilution	Numbe	er of Org Surviving	anisms	Disso	olved Ox (mg/L)	ygen	Те	mperatu (°C)	ıre		pH (su)	
Hour	00	24	48	00	24	48	00	24	48	00	24	48
CONTROL 1												
CONTROL 2												
CONTROL 3												
CONTROL 4												
6.25% A												
6.25% B												
6.25% C												
6.25% D												
12.5% A												
12.5% B												
12.5% C												
12.5% D												
25% A												
25% B												
25% C												
25% D												
50% A												
50% B												
50% C												
50% D												
100% A												
100% B												
100% C												
100% D												

#### REFERENCE TOXICANT RESULTS

Test Species	Date	Reference Toxicant	Source	LC <sub>50</sub>
Daphnia pulex				

#### Additional Monitoring for Discharges to Impaired Waters (if applicable):

Parameter	Frequency	Results (units)	Test Method	Laboratory Name

#### **Statement of Certification**

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of the individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute."		
0:		
Signature of Permittee	Date	
Name of Permittee (print or type)	Title (if applicable)	
Signature of Preparer (if different than above)	Date	
Name of Preparer (print or type)	Title (if applicable)	

Please send all completed forms to:

WATER TOXICS PROGRAM COORDINATOR BUREAU OF WATER PROTECTION AND LAND REUSE CT DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION 79 ELM STREET HARTFORD, CT 06106-5127

### General Permit for the Discharge of Stormwater Associated with Industrial Activity, effective 10/1/2011

# Data Tracking Sheet General and Sector G Transportation Facilities Only Monitoring Requirements

Permittee Name:	Permit #: GSI	
Site Name:		
Site Address:		
Sample Location:		
•		

Enter the sample dates and the data reported for the four (4) most recent semi-annual sample results at this discharge location into the chart below. To determine the average for the four samples add up each of the four results and then divide that number by 4.

Average = (Sample 1 + Sample 2 + Sample 3 + Sample 4)

		Sample	Result		and the state of t		
Parameter	1	2	3	4			Qualify for
Sample					Average	Benchmark*	Qualify for
Date							exemption?
O&G						5.0 mg/L	
Sample pH						5-9 S.U.	
COD						75 mg/L	
TSS						90 mg/L	
TP						0.40 mg/L	
TKN						2.30 mg/L	
NO <sub>3</sub> -N						1.10 mg/L	
Total						0.059 mg/L	
Copper							
Total Zinc						0.160 mg/L	
Total Lead						0.076 mg/L	

\*If the average of the four (4) most recent samples is less than the benchmark listed, your facility is no longer required to sample semi-annually for that parameter for the rest of the permit (current permit expires 9/30/2016). If your facility qualifies for an exemption from monitoring for sample pH, your facility is also exempt from monitoring rainfall pH for the remainder of the permit.

If the average of the four (4) most resent samples is equal to or greater than the benchmark listed, check the appropriate box on page 1.If so, you have exceeded the benchmark and must continue to sample this parameter semiannually until the average is below the benchmark. See Section 5(e)(1)(B) of the General permit for requirements when exceeding a benchmark.

If the sample result reported by the testing laboratory was below detection limit, for the purpose of averaging, use a value that is ½ the detection limit for that parameter in the formula above. For example, if the result for Oil & Grease was <2.0 mg/L, use a value of 1.0 mg/L for determining the average. Please refer to Section 5 e(1)B(iii) of the General Permit for a more detailed explanation.

SUMMARY OF POTENTIAL POLLUTANT SOURCES

Potential Pollutant Source	In Outfall Drainage Area*	Material(s) that are associated with source	Chemical constituents of Materials
Leaking from Trash Barrels/Dumpsters	CB-1	Empty containers, wood, etc.	Small amounts Paint, oil
Unloading incoming raw materials	CB-1	Steel, Paint, Oil	Iron Solvents, Pigments and Oil
Shipping, receiving: Steel, raw and finished	CB-1	Steel	Iron
Leaking from scrap roll off boxes	CB-1, CB-2	Steel, oil	Iron, oil
Outside Yard areas	CB-1, CB-2	Oil, Metal, Dust, Wood	Oil, Iron and suspended solids
Parking Area	CB-1	Oil, petroleum-based	Automotive Oils and fuels and suspended solids

<sup>\*</sup>As identified in Figure 1

TABLE 8

Monthly Visual Inspection Form

Material Handling Area, Spill Reporting and Emergency Equipment Inspection

Log

Inspection Point	Yes/No N/A	Observations & Corrective Actions
Are the inside waste oil drum (s) in good condition and free of leaks?		
<ol><li>Are any inside containment areas in good condition (free of cracks)?</li></ol>		
3 Is there evidence of material spills or leaks at the shipping/receiving doors?		
4. Is the facility spill kit stocked and available for use in the event of an emergency?		
5. Is the area around the dumpster free of debris?		
Are outfall drainage areas free of visible discharge/contamination and trash?		
7. Is there evidence of leakage in areas of the facility where chemicals are stored or handled?		
8. Is there evidence of materials being swept from the building into the yard?		
Are all dumpsters and roll offs covered?		
10. Is all outside steel storage off the ground?		
11. Are all gravel areas maintained to prevent erosion?		
12. Are vegetated areas maintained to prevent erosion?		
Other:		
Inspected By:	_ Date: _	Time:

Retain for minimum of 5 years

#### Quarterly Visual Monitoring Report Form

Outfall No:	Q	Quarter: 1 <sup>st</sup> 2 <sup>nd</sup> 3 <sup>rd</sup> 4 <sup>th</sup> Year:_
Date/Time Collected:	D	Pate/Time Examined:
Rainfall Amount:	Q	Qualifying Storm? Yes No
Runoff Source: Rain	nfall Snowmelt	
Examiner (print):	Е	xaminer (sign):
_ ,		
PARAMETER	OBSERVATION	CHARACTERISTICS
Color		4O
Odor	Does the sample have an o	dor? Describe: NO
Clarity	Is the stormwater clear or transparent? YES N	Which best describes the clarity?  CLEAR MILKY OPAQUE
Floating Solids	Is something floating on the surface of the sample?  YES	ne Describe:
Settled Solids	Is something settled on the bottom of the sample?	
Suspended Solids	Is something suspended in sample's water column? YES	the Describe:
Foam	Is there foam or material forming on the top of the sample surface?	Describe:
Oil Sheen	Can you see a rainbow effer sheen on the surface? YES	Rainbow Sheen Floating oil globules NO Describe:
Other Obvious Indicators of Pollution		Describe:
Based on the conditions of are inadequate or require		potential that the facility's current control measures
CORRECTIVE ACTIONS	C TAKEN	

# TABLE 9 EMERGENCY PROCEDURES FOR MINOR SPILLS (RETAIN THIS FORM WITH THE SPPP FOR THE PERMIT TERM)

Step	Procedure	Notes
1	Advise the plant manager immediately of all spills of hazardous material, even if it is a small quantity spill.	
2	Evaluate the situation and determine the necessary response actions	* If there is a potential for a fire (e.g. the spilled liquid is flammable), shut down all nearby operations.
3	Decide whether general evacuation or evacuation of specific area of the facility is appropriate	
4	Call 911 if the situation is serious or has the potential for a fire or explosion to develop	
5	If the spill is creating an inhalation hazard or bothersome vapors, do no approach the spill area without proper protection. Start clean-up only under the direction of the plant manager and only if you are properly trained and certified.	You may need a respirator. If so make sure the cartridge has not expired or damaged, the respirator is fit-tested to you and you know how to properly use one. Gloves, eye shields and protective clothing also may be necessary
6	If the spilled material is flammable, shut off circuit breakers for any nearby electrical equipment. Do not allow the electrically-powered hand trucks or forklifts operate in the clean-up area. Do not operate electrical equipment or switches in the area.	
7	Contain the spill as close to the source as is safely possible. Construct a dike of absorbent socks, pads, or pillows as appropriate from an emergency spill kit.	
8	Either scoop up the contained liquid or sop it up with sorbent material. This should be completed before the puddle spreads out, evaporates or is tracked away from the area.	Some solvents can permeate concrete if left for an extended period and this creates a pathway to ground contamination.  Remember that safety is more important than cleaning a spill up hastily.
9	Inspect a designated drum or pail to ensure it is free of incompatible material. Place spilled liquid material in a drum or pail for recovery or disposal. Place any Speedi-dry or sorbent sock used in a drum or pail for proper disposal.	If dealing with a flammable material, electrically ground all drums or pails being used for clean-up.

If you have any questions or need assistance containing, cleaning up or disposing of contaminated material; contact a licensed spill contractor such as Clean Harbors 860 583-

 $\frac{\text{TABLE 10}}{\text{EMERGENCY PROCEDURES FOR SPILLS OR RELEASES TO THE}}$  ENVIRONMENT

Step	Procedure	Notes
1	Advise the plant manager immediately of all spills of hazardous material outdoors, even if it is a small quantity spill.	
2	Evaluate the situation and determine the necessary response actions. This may include covering the catch basin nearest the spill.	* If there is a potential for a fire (e.g. the spilled liquid is flammable), shut down all nearby operations.
3	Decide whether general evacuation or evacuation of specific area of the facility is appropriate	
4	Call 911 if the situation is serious or has the potential for a fire or explosion to develop	
5	If the spill is creating an inhalation hazard or bothersome vapors, do no approach the spill area without proper protection. Start clean-up only under the direction of the plant manager and only if you are properly trained and certified.	You may need a respirator. If so make sure the cartridge has not expired or damaged, the respirator is fit-tested to you and you know how to properly use one. Gloves, eye shields and protective clothing also may be necessary
6	Contain the spill as close to the source as is safely possible. Construct a dike of absorbent socks, pads, or pillows as appropriate from an emergency spill kit.	
7	Either scoop up the contained liquid or sop it up with sorbent material. This should be completed before the puddle spreads out, evaporates or is tracked away from the area.	Some solvents can permeate concrete if left for an extended period and this creates a pathway to ground contamination. Remember that safety is more important than cleaning a spill up hastily.
8	Inspect a designated drum or pail to ensure it is free of incompatible material. Place spilled liquid material in a drum or pail for recovery or disposal. Place any Speedi-dry or sorbent sock used in a drum or pail for proper disposal.	If dealing with a flammable material, electrically ground all drums or pails being used for cleanup.
9	Assess potential hazards to human health or the environment including runoff into surface waters.	
10	Call the appropriate agencies to report the release. Document the spill area and potential environmental receptors by sketching it on Figure 1.  If you have any questions or need assistance con	Local Fire Dept: 911 DEEP (24-hr Line): 860 566-3338 National Response Center 1-800-424-8802 (large release only)

If you have any questions or need assistance containing, cleaning up or disposing of contaminated material; call a spill contractor such as Clean Harbors 860 583-8917

#### CHECKLIST/REPORT FOR SEMI ANNUAL FACILITY INSPECTIONS

Facility Pepin Iron & Steel Works LLC

Address 43 Waterbury Rd. Bristol CT 06010

Equipment	Inspection	Check	Follow-up Action (if applicable)
Catch Basins	All basins draining properly? Any visible sheen? Any scum layer observed? Any excess sediment?	[] Yes [] No [] Yes [] No [] Yes [] No [] Yes [] No	
Spill Kit and Equipment	Spill control equipment in place? Adequate to potential needs? Spill absorbant Gloves Shovel Safety glasses Empty drum(s)	[] Yes [] No [] Yes [] No	
Building Interiors	Pathways blocked to the outside?	[]Yes []No []Yes []No	
Parking Lot/Yard Areas	Any indication of spills or leaks? Is the gravel area in need of maintenance (due to erosion).	[]Yes []No []Yes []No	
Inspector (print):	Signat	ture:	
Date://_			

#### ANNUAL TRAINING AGENDA AND ROSTER

Facility: Pepin Iron & Steel Works, LLC

Address: 43 Waterbury Rd. Bristol CT 06010

#### **Synopsis of SWPPP Material Covered:**

- 1. What the Storm water Pollution Prevention Plan is.
- 2. Goals of the SWPPP
- 3. General employee responsibilities for keeping a clean yard
- 4. Responses to leaks and spills inside and outside
- 5. Emergency procedures
- 6. Spill equipment location(s)

7. Other:	Management of Exosical and
	preventant of solids transport Vin
	INKITATION and Cath basins on site

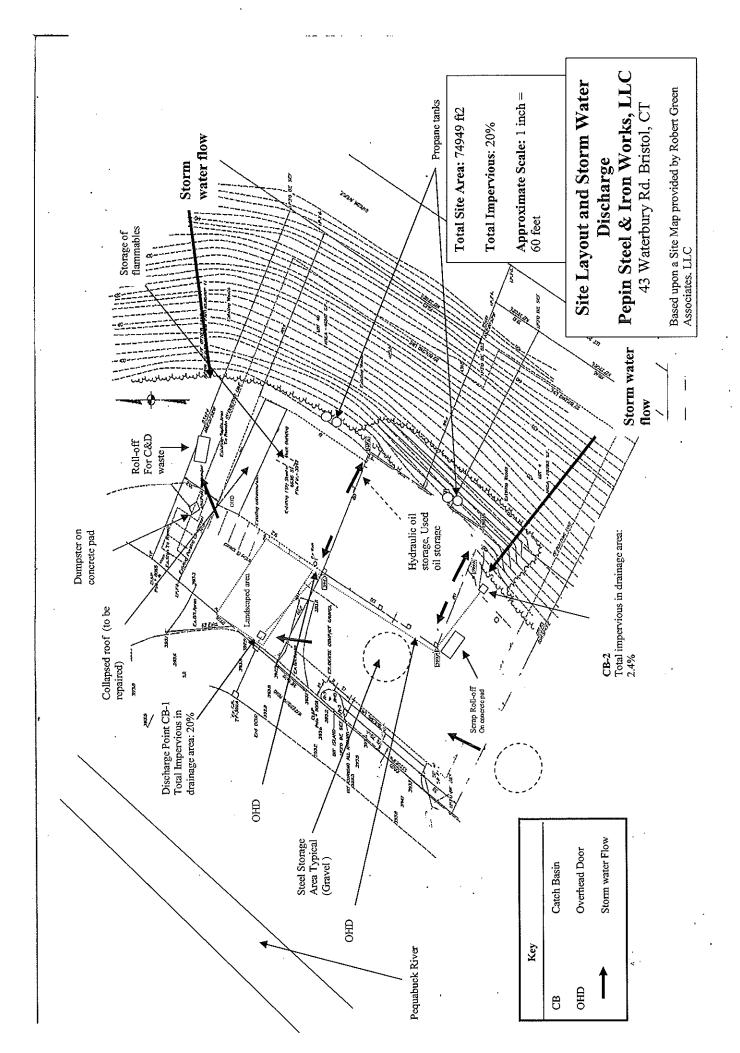
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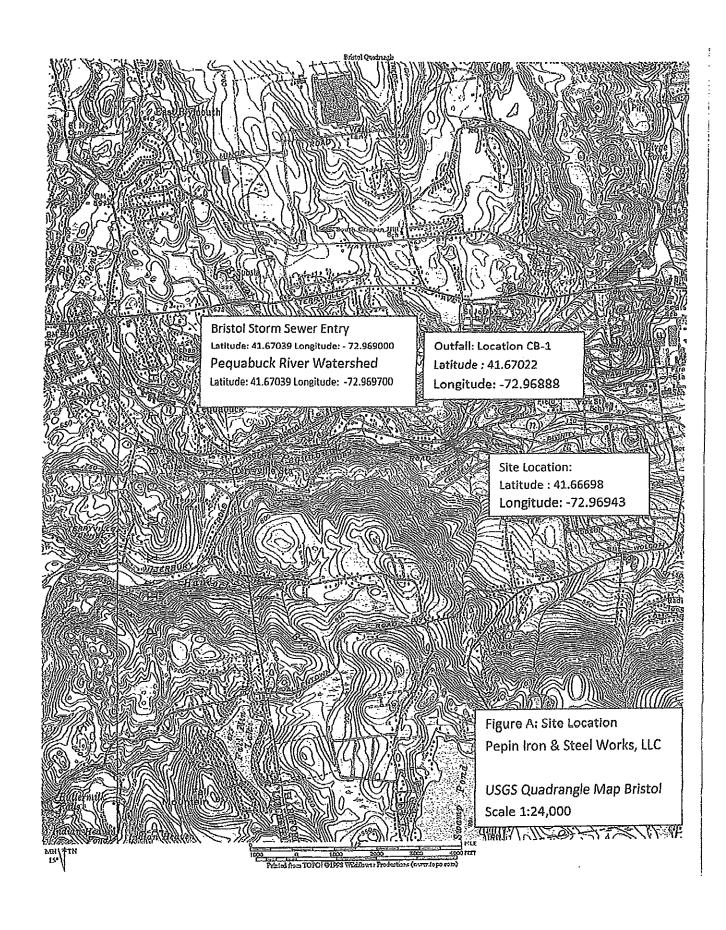
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Signature: Tai Steem

Date: 7 /30 /12





# CERTIFICATION OF EVALUATION OF NON-STORM WATER DISCHARGES

A. Non-Stormwater Discharges

"I certify that in my professional judgment, the stormwater discharge from the site consists only of stormwater, or of stormwater combined with wastewater authorized by an effective permit issued under section 22a-430 or section 22a-430b of the Connecticut General Statutes, including the provisions of this general permit, or of stormwater combined with any of the following discharges provided they do not contribute to a violation of water quality standards: landscape irrigation or lawn watering; uncontaminated groundwater discharges such as pumped groundwater, foundation drains, water from crawl space pumps and footing drains; discharges of uncontaminated air conditioner or refrigeration condensate; water sprayed for dust control or at a truck load wet-down station; naturally occurring discharges such as rising groundwaters, uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(20)), springs, and flows from riparian habitats and wetlands. This certification is based on testing and/or evaluation of the stormwater discharge from the site. I further certify that all potential sources of non-stormwater at the site, a description of the results of any test and/or evaluation for the presence of non-stormwater discharges, the evaluation criteria or testing method used, the date of any testing and/or evaluation, and the on-site drainage points that were directly observed during the test have been described in detail in the Stormwater Pollution Prevention Plan prepared for the site. I further certify that no interior building floor drains exist unless such floor drain connection has been approved and permitted by the commissioner or otherwise authorized by a local authority for discharge as domestic sewage to sanitary sewer. I am aware that there may be significant penalties for false statements in this certification, including the possibility of fine and imprisonment for knowingly making false statements."

Name of Registered Professional Engineer or CHMM: Robert Jhn k	Lancue
Signature of Registered Professional Engineer or CHMM:	Date: 7/1/12
Registration Number: 8 400	State: C

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#### **Plan Certification**

"I certify that I have thoroughly and completely reviewed the Storm water Pollution Prevention Plan prepared for this site. I further certify, based on such review and site visit by myself or my agent, and on my professional judgment, that the Storm water Pollution Prevention Plan meets the criteria set forth in the General Permit for the Discharge of Storm water Associated with Industrial Activity effective on October 1, 2011. I am aware that there are significant penalties for false statements in this certification, including the possibility of fine and imprisonment for knowingly making false statements."

Name of Registered Professional Engineer or CHMM: Lebus The	Mone	(e)
Signature of Registered Professional Engineer Or CHMM	Date:	7/11/12
Registration Number: 8400	State: _	C

SEAL:

#### **Facility Authorization**

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute."

Allow Pepin