Storm Water Pollution Prevention Plan

Willoughby Oil Company – Rhea's Bulk Facility

17155 Highway 64

Somerville, Tennessee

Prepared for:
Willoughby Inc.
P.O. Box 547
Savannah, TN

October 19, 2020

FISHER ARNOLD
ENGINEERING INTEGRATION

9180 Crestwyn Hills Drive, Memphis, TN 38125
901.748.1811 www.fisherarnold.com

STORM WATER POLLUTION

PREVENTION PLAN

for

Willoughby Oil Company – Rhea's
17155 Highway 64
Somerville, Tennessee 38068
TNR051866

Prepared by:

Fisher Arnold, Inc.
9180 Crestwyn Hills Drive
Memphis, Tennessee 38125
901-748-1811

Project No. WILLOUGH.0001EN

October 19, 2020

STORM WATER POLLUTION PREVENTION PLAN CERTIFICATION

Facility Name: Willoughby Oil

Facility Address: 17155 Highway 64

Somerville, Tennessee

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

Signature: _____

Name: Lee Willoughby

Title: Vice President

Date: _____

TABLE OF CONTENTS

TABLE OF CONTENTS, continued

APPENDICES

1.0 INTRODUCTION

Willoughby Oil is located at 17155 Highway 64 in Somerville, Fayette County, Tennessee. The facility is located along the north side of Highway 64 just west of the intersection with Jernigan Drive on a parcel of approximately two acres. The facility is a bulk oil and fuel distributor. The facility is characterized by SIC Codes 5171 as a bulk oil and fuel terminal. This Storm Water Pollution Prevention Plan (SWPPP) is designed to update the information in the SWPPP to incorporate the information that was gathered during the 2020 storm water site inspection.

Storm water discharges from Willoughby Oil are covered by the Tennessee Department of Environment and Conservation Tennessee Storm Water Multi-Sector General Permit (TMSP) #TNR051866 (NOI Appendix A; Permit Provisions – Appendix B). Storm Water discharges from the site are associated industrial activities from Bulk Oil and fuel storage and dispensing (Sector P). This SWPPP is prepared to address requirements in the General Permit. This SWPPP specifically addresses the following (among other items):

- Pollution Prevention Team
- Description of Potential Pollutant Sources
- Measures and Controls
- Non-Storm Water Discharges
- Comprehensive Site Compliance Evaluation
- Monitoring and Reporting Requirements

This document satisfies the requirements for a SWPPP in accordance with the General Permit requirements for Willoughby Oil.

2.0 STORM WATER POLLUTION PREVENTION TEAM

The members of the storm water pollution prevention team for Willoughby Oil are listed in Appendix C. These individuals are responsible for assisting in the planning, implementation, management, and revision of the SWPPP.

3.0 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

The following sections describe potential sources of pollutants in the storm water discharge from Willoughby Oil. Willoughby Oil has one storm water outfall located at the site as shown on Figure 1 in Appendix D. A description of the areas that drain to this outfall is included in Section 3.1. The outfall ultimately drains to an unnamed tributary to the Loosahatchie River, which is north of and flows west of Willoughby Oil as shown on Figure 2 in Appendix A.

3.1 Drainage and Exposed/Potentially Exposed Materials

The SWPPP site map (Figure 1) presents the storm water drainage patterns, storm water conveyances and management devices, and discharge location from Willoughby Oil, loading and unloading areas, and storage areas, as well as the general facility layout. The following narrative for the outfall that includes the industrial activities that are exposed to precipitation. A description of practices and housekeeping measures to prevent storm water contamination is provided. Taken together, these practices, measures, and controls constitute Willoughby Oil's pollution prevention plan and best management practices (BMPs) for storm water.

Outfall #1 – Confluence of discharges from the facility oil water separator pipe outlet and surface sheet flow in the northwest corner of the property. This outfall is fed by the tank farm pipe rack transfer area and the tank farm fuel containment area. Sheet flow from storage areas on the property also flows to this area of the property. A portion of this outfall is fed by roof drainage from the warehouse building.

The primary potentially exposed materials include fuel transfer activities, oil water separator clean-out, and various storage areas on the property.

The potential for erosion is limited due to the fact that a majority of the property is paved. If areas of the facility do become disturbed due to temporary construction activities, hay bales or silt fences will control erosion. A preventative maintenance plan is in place, which includes periodic inspections of potential sources of storm water pollution. These measures contribute to the good housekeeping maintained at the plant.

Some oil and engine products such as diesel exhaust fluid (DEF) are kept in the warehouse. DEF contained in totes are transferred to smaller containers for retail sales. This process occurs completely indoors.

All chemicals used, scrap material, and solid wastes are removed by outside contractors and recycled when possible. Any current machinery, tanks, or equipment that is stored outdoors is cleaned as necessary to remove fuel or related debris. These practices reduce the potential for pollutants to enter storm water discharges.

3.2 Risk Identification and Pollutant Sources

3.2.1 Spills and Leaks

There have been no significant spills or leaks of toxic or hazardous pollutants during the past five years.

If, during the routine handling or transport of fuel or oil at Willoughby Oil, a

spill occurs, steps will be taken to prevent such spill from leaving the site. This includes the use of spill pans under the tanker pick-up of oil water separator product, as well as absorbents, shovels, booms, or trenches. Handling or transport of oils or fuel outdoors during a storm event will be avoided, if possible, to reduce the risk of a spill leaving the site.

3.2.2 Oil and Fuel Transfer from Tanker Trucks

Diesel fuel, gasoline, kerosene, and oils are stored and transferred at Willoughby Oil. The fuels are delivered by tanker truck via a covered pipe rack as shown on Figure 1. Fuels are transferred or picked up from above ground piping that is connected to an aboveground storage tank (AST) farm in the central area of the site. Two drains, one at the pipe rack and one within the tank containment area, drain to the oil water separator (OWS). Any fuels that might be contained within the runoff, is contained in the OWS and later removed by a third-party contractor. The OWS drains into Outfall #1. This outfall eventually discharges into an unnamed tributary of the Loosahatchie River.

Oils of various retail containers and sizes are delivered to the warehouse via a loading dock that is equipped with a drainage inlet. The inlet is connected to the OWS in the event that oils are leaked or spilled in this area.

Potential Pollutants – Diesel fuel, gasoline, kerosene, and various automobile oils could be released during the transfer process.

Best Management Practice - Willoughby Oil will continue to monitor hoses, connections, and above ground pipelines during the transfer process to minimize the potential releases. The AST tank farm is equipped with a valve drain that can be opened to release rainwater to the OWS. Any accumulation of free product at this location will be removed prior to discharge to the OWS.

3.2.3 Oil-Water Separator Transfer Area

Diesel fuel, gasoline, kerosene, and oils are stored and transferred at Willoughby Oil. The fuels are delivered by tanker truck via a covered pipe rack as shown on Figure 1. Fuels are transferred or picked up from above ground piping that is connected to an aboveground storage tank (AST) farm in the central area of the site. Two drains, one at the pipe rack and one within the tank containment area, drain to an oil water separator (OWS). Any fuels that might be contained within the runoff, is contained in the OWS and later removed by a third-party contractor. The OWS drains into Outfall 01. This outfall eventually discharges into an unnamed tributary of the Loosahatchie River.

Tanker truck removal of accumulated fuel or oil within the OWS occurs on a periodic basis.

Potential Pollutants - Diesel fuel, gasoline, kerosene, and various automobile oils could be released during the transfer process.

Best Management Practice – Typical DOT safe practices are employed during the OWS transfer process. Drip pans are used at the truck connection, as well as continuous observation during this process.

3.2.4 Equipment Storage Areas

Willoughby Oil stores equipment related to retail petroleum fueling at various exterior areas on the property. Gross fuel or contamination is removed from this equipment, if any, prior to exterior storage.

Potential Pollutants – Diesel fuel, gasoline, kerosene, and various automobile oils could be released during the storage and rainfall process.

Best Management Practice - Willoughby Oil will continue to monitor this area of the property. If necessary, this equipment can be re-cleaned to remove debris that could cause contamination.

3.3 Sampling Data

Sector P for Willoughby Oil does not require annual analytical sampling at Outfall #1. Annual sampling at this facility has not taken place prior to this report, therefore, no data is available from previous years.

4.0 MEASURES AND CONTROLS

Storm water pollution prevention measures and controls utilized at Willoughby Oil include the following:

- Good housekeeping activities in all outdoor material handling and storage areas.

  These will include prompt cleanup of spills, stains, and solid debris. Periodic inspections will identify areas of improved housekeeping or maintenance.

  Vehicle and Equipment Storage, Cleaning, and Maintenance Areas are located inside.

- Measures to prevent or minimize exposure of chemicals, tanks, and drums to storm water.

Oil containers including 55-gallon drums of oil products are stored inside the warehouse. Unloading activities of bulk fuels is accomplished via closed systems and monitored by operators to assure minimal spillage. Unloading of containers and loading operations are accomplished at the loading dock thus minimizing exposure to precipitation. Operators are trained to look for spills or leaks that should be brought to the Maintenance Department's attention.

The AST fuel farm drain to the OWS is equipped with a valve that remains in the closed position until opened by a Willoughby Oil employee.

- Annual employee training to minimize storm water pollution.

  These include awareness of SWPPP requirements, proper outdoor storage and disposal practices, and proper procedures regarding drainage of containment areas to reduce potential pollution. The training shall incorporate the information listed in Section 6.0 and shall be documented using the Training Record Form found in Appendix G.

- Routine Inspections & Recordkeeping

  Quarterly observations of the general housekeeping conditions, spill prevention measures, and material handling procedures throughout the plant, including in outdoor areas of the site, will assist in identifying and correcting conditions leading to the potential for exposure of pollutants to storm water. These inspections will be documented in Appendix H.

5.0 ANNUAL COMPRHENSIVE SITE COMPLIANCE EVALUATION

Annually, qualified personnel will conduct a comprehensive evaluation of the facility compliance with the SWPPP and the adequacy of the SWPPP. Such evaluations shall include a review of measures and controls to prevent storm water contact with pollutants. The plan shall be revised, as appropriate, based on the results of this evaluation. A report of the results of the annual evaluation shall be prepared and kept with the SWPPP for at least three years. This report shall be signed by a responsible corporate official or his designee. The report form and certification are found in Appendix F of this plan.

6.0 EMPLOYEE TRAINING

Annual training of personnel responsible for implementing activities identified in this SWPPP shall be conducted. Training shall be documented using the form found in Appendix G. Training topics will normally include the following:

- Summary of the SWPPP provisions, requirements, and goals
- Spill prevention, response, and control
- Good housekeeping and Pollution Prevention practices

The following training outline may be used as a curriculum guide for employee training.

1. Summary of the SWPPP
   a. Adequacy of current plan
   b. Current and new team members
   c. New processes or outdoor activities

2. Spill Prevention, Response and Control
   a. Review of spill prevention procedures
   b. Identify spill response team members
   c. Identify potential spill areas and drainage routes
   d. Discussion of past spill events, causes and cleanup activities evaluation
   e. Posting of warning signs and in potential spill areas with emergency contacts
   f. Identify location and composition of spill cleanup equipment

3. Good Housekeeping Procedures
   a. Routine for inspections of debris, trash and liquid spills and stains
   b. Maintenance of housekeeping equipment
   c. Description of spill cleanup procedures

4. Pollution Prevention Procedures
   a. SDS availability
   b. Safety equipment
   c. Notification procedures

7.0 SPECIAL REQUIREMENTS

7.1 Discharge into or Through Permitted Municipal Separate Storm Sewer Systems (MS4)

Storm water from Willoughby Oil does not discharge into a Municipal Separate Storm System. Therefore, this requirement does not apply to Willoughby Oil.

7.2 Facilities Subject to EPCRA Section 313 Requirements

The fuel storage and transfer activities at Willoughby Oil do include the use of EPCRA 313 chemicals within the stored fuel products. However, the facility does not employ 10 or more full time employees at this location. Therefore, EPCRA reporting requirements do not apply to Willoughby Oil at this location.

7.3 Discharges to Water Quality Impaired/Water Quality Limited Waters

The storm water from Willoughby Oil discharges into an unnamed tributary of the Loosahatchie River (TN08010209011-1000) within Fayette County, Tennessee. This area is listed in the proposed final 303(d) list dated April 2020 for physical substrate habitat alterations (Category 5), which indicates one or more uses of the river are not

being met. As such, requirements related to this issue for physical substrate habitat alterations do not appear to apply to Willoughby Oil.

7.4 Non-Storm Water Discharges

The only non-storm water discharges allowed are:

- ◊ Fire hydrant flushings
- ◊ Potable water including water line flushings
- ◊ Uncontaminated air conditioning or compressor condensate
- ◊ Irrigation drainage
- ◊ Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with manufacturer's instructions
- ◊ Uncontaminated ground water or spring water
- ◊ Foundation or footing drains where flows are not contaminated with process materials such as solvents
- ◊ Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of your facility, but NOT intentional discharges from the cooling tower (e.g., "piped" cooling tower blowdown or drains)
- ◊ Discharges from wet deck storage areas, which are authorized only if no chemical additives are used in the spray water or applied to the logs.

A Non-stormwater certification form is included in Appendix E and should be completed on an annual basis.

7.5 Sediment and Erosion Control

Sediment and erosion control is completed by the existence of surface paving at the facility.

7.6 Management of Runoff

The primary storm water management practice at this facility is the use of an oil water separator to prevent fuel and oil from the fueling areas of the site from migration off the target property. The 20,000-gallon OWS is maintained on a regular basis with pick-ups by third party vendors to recycle these products. The OWS is regularly inspected for efficiency and operational control.

7.7 Management of Run-on

Currently, no storm water run-on from third party locations is managed at this location.

8.0 MONITORING AND REPORTING REQUIREMENTS

Sector P requirements for monitoring and reporting include quarterly visual analysis. This requirement shall be met as follows:

8.1 Sample Locations

Storm water samples will be collected for quarterly visual analysis from Outfall 01.

Outfall #1 – Northwest corner of property.

8.2 Sample Collection

A minimum of one grab sample from the outfall from a storm event with at least 0.1 inch of precipitation (defined as a ‘‘measurable’’ event), providing the interval from the preceding measurable storm is at least 72 hours. The 72-hour storm interval is waived when the preceding measurable storm did not yield a measurable discharge, or if it is documented that less than a 72-hour interval is representative for local storm events during the sampling period.

The grab sample will be collected during the first 30 minutes of the discharge. If it is not practicable to take the sample during the first 30 minutes, sample during the first hour of discharge and describe why a grab sample during the first 30 minutes was impracticable. This information will be included on the discharge monitoring report. When the sampled discharge commingles with process or non-process water, an attempt to sample the storm water discharge before it mixes with the non-storm water will be made.

The following information will be recorded for each sampling event:

- ◊ The date and duration (in hours) of the storm event(s) samples;
- ◊ Rainfall measurements or estimates (in inches) of the storm event that generated the sampled runoff; and
- ◊ The duration between the storm event samples and the end of the previous measurable (greater than 0.1-inch rainfall) storm event.

8.2.1 Laboratory Analysis

No laboratory analysis is required for Sector P.

8.2.2 Visual Analysis

Quarterly, storm water samples will be collected as previously described for visual inspection. Each sample will be evaluation in a well-lit area for the following parameters:

- ◊ Color
- ◊ Odor
- ◊ Murky
- ◊ Floating Solids
- ◊ Scum
- ◊ Foam
- ◊ Sludge Present
- ◊ Oily sheen
- ◊ Stains on conveyance (if applicable)
- ◊ Plant life present and healthy near outfall

This information will be recorded on the form provided in Appendix H and maintained in the SWPPP notebook. This form will also be used for any necessary periodic inspections, or inspections to observe corrective actions, or post spill event inspections.

8.3 Reporting

Willoughby Oil must maintain the results of the quarterly sampling at Outfall #1 on-site. No regular stormwater reporting is required to be submitted to Tennessee Department of Environment and Conservation (TDEC).

Quarterly and annual inspections will be performed by Willoughby Oil personnel of the on-site operations. An annual inspection form is provided in Appendix F. A quarterly Inspection form is provided in Appendix H. Spill events, if any, will be recorded on a Spill Report Form in Appendix I.

APPENDIX A

NOTICE OF INTENT

Tennessee Department of Environment and Conservation - Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243

TN DEPT OF ENVIRONMENT AND CONSERVATION
DEC 07 2015
DIV OF WATER RESOURCES
RECEIVED

NOTICE OF INTENT (NOI)

for Storm Water Discharges Associated with Industrial Activity under the
TENNESSEE MULTI-SECTOR GENERAL PERMIT (TMSP)

Type of application: ☐ New ■ Reissuance ☐ Modification

(If this NOI is Reissuance or Modification provide the existing permit tracking number: **TNR05** 1866)

Facility Name: Willoughby, Inc.	County: Fayette	
Street Address or Location: 17155 Highway 64, Somerville, TN	Latitude (DD.DDD):	35.243
	Longitude (-DD.DDD):	-89.343
Attach a copy of a topo map, a city map, or a county map, identifying the location of this facility and each outfall	■ Map Attached	
Has a Storm Water Pollution Prevention Plan (SWPPP) been developed?	■ Yes ☐ No	

Owner or Operator: (the person or legal entity which controls facility's operation; this may or may not be the same as the facility name or the official contact name)
Willoughby, Inc.

1

Official Contact Person Name: (Individual Responsible for a Facility) Lee Willoughby	Title or Position: Vice-President		
Mailing Address: P.O. Box 547	City: Savannah	State: TN	Zip: 38372
Phone: ( ) 731-607-8002	E-mail: lee@willoughbyoil.com		

2

Local Contact Person Name: (if appropriate, write "same as #1") same as #1	Title or Position:		
Facility Address: (this may or may not be the same as street address)	Facility City:	State: TN	Zip:
Phone: ( )	E-mail:		

Write in the box (to the right) or circle the number (above) to indicate where to send correspondence and invoices: 1

Stormwater runoff enters following stream(s) and/or lake(s): (for each outfall, give names and latitude/longitude)
Unnamed Tributary to the Loosahatchie River

Number of stormwater outfalls: 1

Nature of business: Bulk Oil and Fuel Terminal

SIC code(s): (primary code listed as No.1, secondary, if applicable, as No.2, etc.)

1. 5171	2.	3.	4.	5.	6.

Area of property associated with industrial activity: 1.5 **Acres**
(area of facility property should not include recreation areas, landscaping, lawns, greenfields, forest, office buildings, employee parking lots, etc.)

Permit Sectors (STATE USE ONLY)

Activities at facility: Check all that apply.

01. ☐ Manufacturing	05. ☐ Vehicle Maintenance	09. ☐ Wastewater treatment	13. ☐ Coal Pile
02. ■ Storage/Distribution	06. ☐ Hazardous waste TSD	10. ☐ Land application	14. ☐ Borrow Pit or Soil Harvesting
03. ☐ Vehicle Storage	07. ☐ Outside waste disposal	11. ☐ Landfill	99. ■ Other: Bulk Fueling
04. ☐ Trucking Terminal	08. ☐ Recycling	12. ☐ Mining operation	

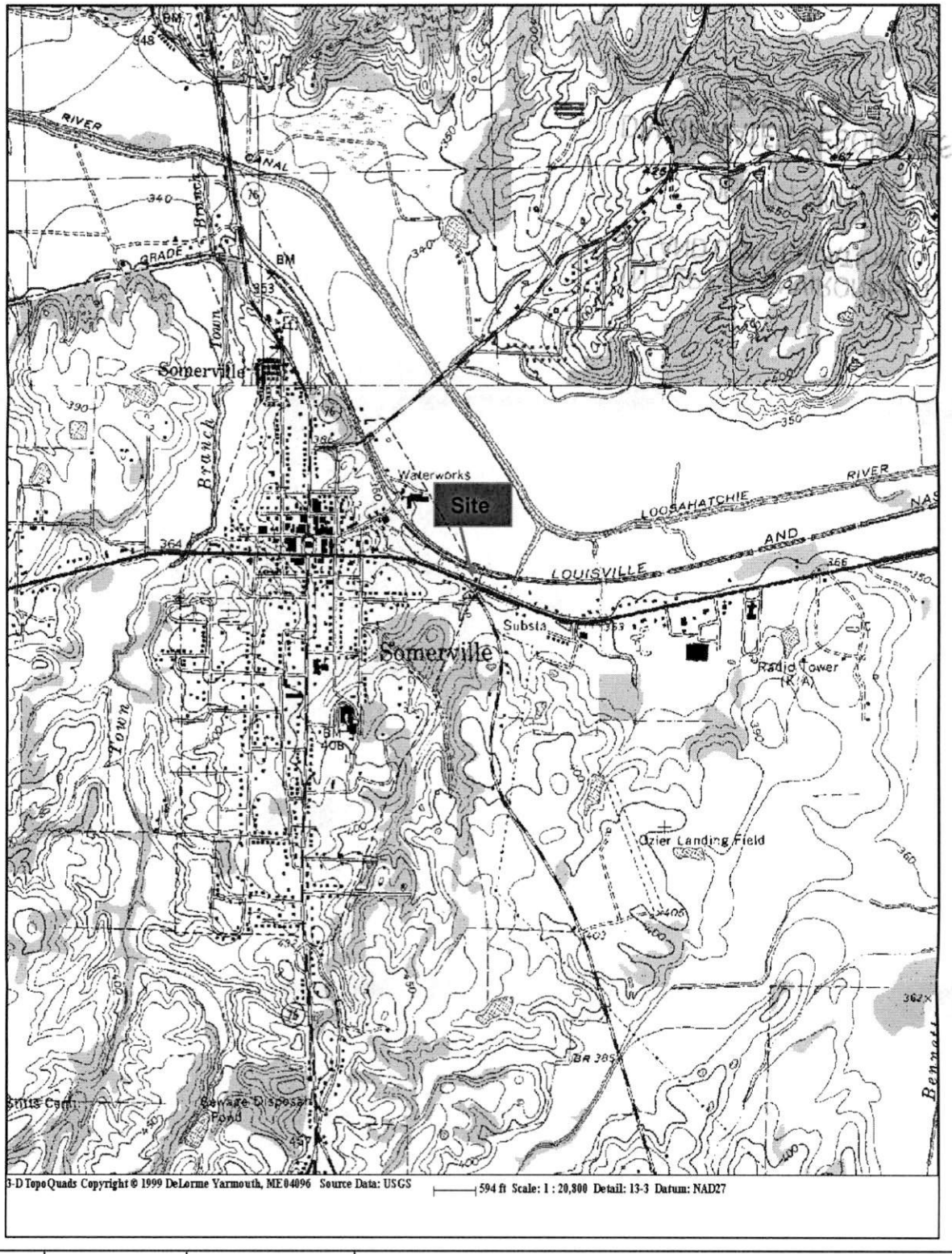
CERTIFICATION AND SIGNATURE (Make all entries in ink, not with a pencil. This NOI must be signed by a responsible corporate officer for a corporation, a general partner for a partnership, the proprietor for a sole proprietorship, or a principal executive officer or ranking elected official for a public agency.)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Lee Willoughby	Vice President	Lee Willoughby	5-15-15
Printed Name	Official Title	Signature	Date

STATE USE ONLY

Received Date	Fee(s)	Reviewer	EFO	Tracking No. TNR05
	T & E Aquatic Fauna	Exceptional TN Water?	Unavailable Conditions	NOC Date



Legend	SOURCE:	North

Rhea's Car Care (FID 8-240038)

17155 Highway 64, Somerville, TN 38068

Fisher & Arnold Environmental
Consulting Engineers & Scientists • A Division of Fisher & Arnold, Inc
9180 Crestwyn Hills Drive • Memphis, Tennessee 38125-8538
901-748-1811 Fax: 901-748-3115 • Web: www.fisherarnold.com

DESIGN:	DRAWN:	SCALE: 1" = 20,800	FIGURE
DATE FLOWN:	FILE:		
JOB NO.:			

State of Tennessee
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

MR. LEE WILLOUGHBY

WILLOUGHBY, INC.

PO BOX 547

SAVANNAH, TN 38372

e-copy: lee@willoughbyoil.com

Tennessee Multi-Sector Permit (TMSP)
Notice of Coverage Fact Sheet

We received from your company a Notice of Intent (NOI) to be covered under the Tennessee Storm Water Multi-Sector Permit (TMSP). The new TMSP became effective on April 15, 2015, and expires on April 14, 2020. **We are hereby notifying you that your facility is covered under this general permit. The facility's SWPPP shall be modified to address additional requirements in the new permit no later than 60 days following the effective date of this permit.**

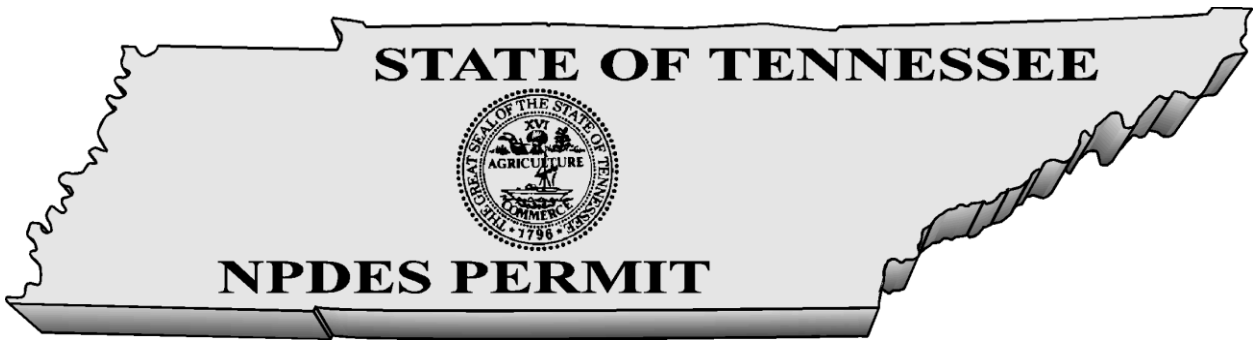
Enclosed with this fact sheet you will find a Notice of Coverage with the permit tracking number, facility's name, address, receiving stream information and the industry-specific sector(s) that apply to your facility. In order to get a copy of the TMSP requirements we ask you to visit our web site located at: http://www.state.tn.us/environment/permits/strmh2o.shtml. We will provide you with a printed copy of the TMSP only upon your request.

The EPA has multiple templates that can be used by industrial facilities to assist in compliance with permit requirements, including but not limited to the annual compliance evaluation, quarterly inspections, monthly inspection, etc. To obtain copies of these templates and/or other resources, please go to http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm.

At our web site, you will be able to download general and sector-specific requirements, as well as permit rationale, Notice of Determination, TMSP guidance documents, links to relevant web sites, and a copy of a No Exposure Certification form. If you do not have access to the Internet, or have other questions, please contact us at 1-888-891-TDEC or by E-mail at *Water.Permits@tn.gov*.

Sincerely,

Vojin Janjić
Manager, Water-Based Systems Unit



Tracking No. TNR051866

Notice of Coverage under the General NPDES Permit for

STORM WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY (TMSP)

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

Under authority of the Tennessee Water Quality Control Act of 1977 (T.C.A. 69-3-101 et seq.) and the delegation of authority from the United States Environmental Protection Agency under the Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977 (33 U.S.C. 1251, et seq.):

Discharger: **Willoughby, Inc.**

is authorized to discharge: storm water associated with industrial activity

from a facility located at: **17155 Highway 64** in **Somerville, Fayette County**

to receiving waters named: **Loosahatchie River.**

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

Coverage under this general permit shall become effective on **December 11, 2015** and shall expire on **April 14, 2020**.

Notice of Coverage Issuance date: **December 11, 2015**

Applicable Sector(s): **P**
TMSP Requirements and Sectors are located at **http://www.state.tn.us/environment/permits/strmh2o.shtml**

APPENDIX B

GENERAL STORM WATER PERMIT (SECTOR P)

Sector P - Stormwater Discharges Associated With Industrial Activity From Motor Freight Transportation Facilities, Passenger Transportation Facilities, Petroleum Bulk Oil Stations and Terminals, Rail Transportation Facilities, and United States Postal Service Transportation Facilities

1. Discharges Covered Under This Section

Storm water discharges from ground transportation facilities and rail transportation facilities that have vehicle and equipment maintenance shops (vehicle and equipment rehabilitation, mechanical repairs, painting, fueling and lubrication) and/or equipment cleaning operations are eligible for coverage under this section:

SIC Code	Sector P: Vehicle Maintenance or Equipment Cleaning areas at Motor Freight Transportation Facilities, Passenger Transportation Facilities, Petroleum Bulk Oil Stations and Terminals, the United States Postal Service, or Railroad Transportation Facilities	Sampling Required?	Table Number
4011	Railroads, Line-haul Operating	No	--
4013	Railroad Switching and Terminal Establishments	No	--
4111	Local and Suburban Transit	No	--
4119	Local Passenger Transportation, NEC	No	--
4121	Taxicabs	No	--
4131	Intercity and Rural Bus Transportation	No	--
4141	Local Bus Charter Service	No	--
4142	Bus Charter Service, Except Local	No	--
4151	School Buses	No	--
4173	Terminal and Service Facilities for Motor Vehicle Passenger Transportation	No	--
4212	Local Trucking Without Storage	No	--
4213	Trucking, Except Local	No	--
4214	Local Trucking with Storage	No	--
4215	Couriers Services Except by Air	No	--
4221	Farm Product Warehousing and Storage	No	--
4222	Refrigerated Warehousing and Storage	No	--
4225	General Warehousing and Storage	No	--
4226	Special Warehousing and Storage, NEC	No	--
4231	Terminal and Joint Terminal Maintenance Facilities for Motor Freight Transportation	No	--
4311	United States Postal Service	No	--
5171	Petroleum Bulk Stations and Terminals	No	--

When an industrial facility, described by the above coverage provisions of this section, has industrial activities being conducted onsite that meet the description(s) of industrial activities in another section(s), that industrial facility shall comply with any and all applicable monitoring and pollution prevention plan requirements of the other section(s) in addition to all applicable requirements in this section. The monitoring and pollution prevention plan terms and conditions of this multi-sector permit are additive for industrial activities being conducted at the same industrial facility (co-located industrial activities). The operator of the facility shall determine which other monitoring and pollution prevention plan section(s) of this permit (if any) are applicable to the facility.

2. Special Conditions

Prohibition of Non-stormwater Discharges. Except for those allowable non-stormwater discharges included in Part 3.1.2 (Allowable Non-Stormwater Discharges) of this permit, there are no other non-stormwater discharges authorized in this Sector.

3. Stormwater Pollution Prevention Plan Requirements

3.1 Deadlines for Plan Preparation and Compliance. There are no additional deadlines for plan preparation and compliance, other than those stated in subpart **Error! Reference source not found.**.

3.2 Contents of the Plan. The plan shall include, at a minimum, the following items:

3.2.1 Pollution Prevention Team. Each plan shall identify a specific individual or individuals within the facility organization as members of stormwater Pollution Prevention Team who are responsible for developing the stormwater pollution prevention plan and assisting the facility or plant manager in its implementation, maintenance, and revision. The plan shall clearly identify the responsibilities of each team member. The activities and responsibilities of the team shall address all aspects of the facility's stormwater pollution prevention plan.

3.2.2 Description of Potential Pollutant Sources. Each plan shall provide a description of potential sources which may reasonably be expected to add significant amounts of pollutants to stormwater discharges or which may result in the discharge of pollutants during dry weather from separate storm sewers draining the facility. Each plan shall identify all activities and significant materials which may potentially be significant pollutant sources. Each plan shall include, at a minimum:

3.2.2.1 Drainage - A site map indicating the location of each point of discharge of stormwater associated with industrial activity, an outline of the portions of the drainage area of each stormwater outfall that are within the facility boundaries (with a prediction of the direction of flow), each existing structural control measure to reduce pollutants in stormwater runoff, surface water bodies, locations where significant materials are exposed to precipitation, locations where major spills or leaks identified under Part 11.P.3.2.2.3 (Spills and Leaks) of this permit have occurred, and the locations of the following activities: fueling stations, vehicle and equipment maintenance and/or cleaning areas, storage areas for vehicles and equipment with actual or potential fluid leaks loading/unloading areas, locations used for the treatment, storage or disposal of wastes, liquid storage tanks, processing areas, storage areas, and all monitoring locations. The site map must also indicate the types of discharges contained in the drainage areas of the outfalls (e.g., stormwater and air conditioner condensate). In order to increase the readability of the map, the inventory of the types of discharges contained in each outfall may be kept as an attachment to the site map.

3.2.2.2 Inventory of Exposed Materials - An inventory of the types of materials handled at the site that potentially may be exposed to precipitation. Such inventory shall include a narrative description of significant materials that have been handled, treated, stored or disposed in a manner to allow exposure to stormwater between the time of 3 years prior to the date of the submission of an NOI to be covered under this permit and the present; method and location of

onsite storage or disposal; dirt or gravel parking areas for storage of vehicles to be maintained; materials management practices employed to minimize contact of materials with stormwater runoff between the time of 3 years prior to the date of the submission of an NOI to be covered under this permit and the present; the location and a description of existing structural and nonstructural control measures to reduce pollutants in stormwater runoff; and a description of any treatment the stormwater receives.

3.2.2.3 Spills and Leaks - A list of significant spills and significant leaks of toxic or hazardous pollutants that occurred at areas that are exposed to precipitation or that otherwise drain to a stormwater conveyance at the facility after the date of 3 years prior to the date of the submission of an NOI to be covered under this permit. Such list shall be updated as appropriate during the term of the permit.

3.2.2.4 Sampling Data - A summary of existing discharge sampling data describing pollutants in stormwater discharges from the facility, including a summary of sampling data collected during the term of this permit.

3.2.2.5 Summary of Potential Pollutant Sources - A narrative description of the potential pollutant sources from the following activities associated with vehicle and equipment maintenance and equipment cleaning: fueling stations; maintenance shops; equipment or vehicle cleaning areas; paved dirt or gravel parking areas for vehicles to be maintained; loading and unloading operations; outdoor storage activities; outdoor manufacturing or processing activities; significant dust or particulate generating processes; and onsite waste disposal practices. The description shall specifically list any significant potential source of pollutants at the site and for each potential source, any pollutant or pollutant parameter (e.g., oil and grease, etc.) of concern shall be identified.

3.2.3 Measures and Controls. Each facility covered by this permit shall develop a description of stormwater management controls appropriate for the facility, and implement such controls. The appropriateness and priorities of controls in a plan shall reflect identified potential sources of pollutants at the facility. The description of stormwater management controls shall address the following minimum components, including a schedule for implementing such controls:

3.2.3.1 Good Housekeeping - All areas that may contribute pollutants to stormwater discharges shall be maintained in a clean, orderly manner. The following areas must be specifically addressed:

3.2.3.1.1 Vehicle and Equipment Storage Areas - The storage of vehicles and equipment awaiting maintenance with actual or potential fluid leaks must be confined to designated areas (delineated on the site map). The plan must describe measures that prevent or minimize contamination of the stormwater runoff from these areas. The facility shall consider the use of drip pans under vehicles and equipment, indoor storage of the vehicles and equipment, installation of berming and diking of this area, use of absorbents, roofing or covering storage areas, cleaning pavement surface to remove oil and grease, or other equivalent methods.

3.2.3.1.2 Fueling Areas - The plan must describe measures that prevent or minimize contamination of the stormwater runoff from fueling areas. The facility shall consider covering the fueling area, using spill and overflow protection and cleanup equipment, minimizing run-on/runoff of

stormwater to the fueling area, using dry cleanup methods, collecting the stormwater runoff and providing treatment or recycling, or other equivalent measures.

3.2.3.1.3 Material Storage Areas - Storage units of all materials (e.g., used oil, used oil filters, spent solvents, paint wastes, radiator fluids, transmission fluids, hydraulic fluids) must be maintained in good condition, so as to prevent contamination of stormwater, and plainly labeled (e.g., "used oil," "spent solvents," etc.). The plan must describe measures that prevent or minimize contamination of the stormwater runoff from such storage areas. The facility shall consider indoor storage of the materials, installation of berming and diking of the area, minimizing run-on/runoff of stormwater to the areas, using dry cleanup methods, collecting the stormwater runoff and providing treatment, or other equivalent methods.

3.2.3.1.4 Vehicle and Equipment Cleaning Areas - The plan must describe measures that prevent or minimize contamination of the stormwater runoff from all areas used for vehicle and equipment cleaning. The facility shall consider performing all cleaning operations indoors, covering the cleaning operation, ensuring that all washwaters drain to the intended collection system (i.e., not the stormwater drainage system unless NPDES permitted), collecting the stormwater runoff from the cleaning area and providing treatment or recycling, or other equivalent measures. The discharge of vehicle and equipment wash waters, including tank cleaning operations, are not authorized by this permit and must be covered under a separate NPDES permit or discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements.

3.2.3.1.5 Vehicle and Equipment Maintenance Areas - The plan must describe measures that prevent or minimize contamination of the stormwater runoff from all areas used for vehicle and equipment maintenance. The facility shall consider performing all maintenance activities indoors, using drip pans, maintaining an organized inventory of materials used in the shop, draining all parts of fluids prior to disposal, prohibiting wet clean-up practices where the practices would result in the discharge of pollutants to stormwater drainage systems, using dry cleanup methods, collecting the stormwater runoff from the maintenance area and providing treatment or recycling, minimizing run-on/runoff of stormwater areas or other equivalent measures.

3.2.3.1.6 Locomotive Sanding (loading sand for traction) Areas - The plan must describe measures that prevent or minimize contamination of the stormwater runoff from areas used for locomotive sanding. The facility shall consider covering sanding areas, minimizing stormwater run-on/runoff, appropriate sediment removal practices to minimize the offsite transport of sanding material by stormwater, or other equivalent measures.

3.2.3.2 Preventive Maintenance - A preventive maintenance program shall include timely inspection and maintenance of stormwater management devices (e.g., cleaning oil/water separators, catch basins, drip pans, vehicle-mounted drip containment devices) as well as inspecting and testing facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters, and ensuring appropriate maintenance of such equipment and systems.

3.2.3.3 Spill Prevention and Response Procedures - Areas where potential spills could contribute pollutants to stormwater discharges, and their accompanying drainage points, shall be

identified clearly in the stormwater pollution prevention plan. The plan should consider specifying material handling procedures, storage requirements, and use of equipment such as diversion valves. Procedures and equipment for cleaning up spills shall be identified in the plan and made available to the appropriate personnel.

3.2.3.4 Inspections - Qualified facility personnel shall be identified to inspect designated equipment and areas of the facility on a quarterly basis. The following areas shall be included in all inspections: storage area for vehicles and equipment awaiting maintenance, fueling areas, vehicle and equipment maintenance areas (both indoors and outdoors), material storage areas, vehicle and equipment cleaning areas, and loading and unloading areas. Follow-up procedures shall be used to ensure that appropriate actions are taken in response to the inspections. Records of inspections shall be maintained. The use of a checklist should be considered by the facility.

Note that additional Stormwater Pollution Prevention Plan (SWPPP) requirements for discharges into waters with unavailable parameters or Exceptional Tennessee waters, as described in the subpart 4.6 of this permit may be applicable to your facility.

3.2.3.5 Employee Training - Employee training programs shall inform personnel responsible for implementing activities identified in the stormwater pollution prevention plan or otherwise responsible for stormwater management of the components and goals of the stormwater pollution prevention plan. Training should address topics such as spill response, good housekeeping and material management practices. The pollution prevention plan shall identify how often training will take place; at a minimum, training must be held annually (once per calendar year). Employee training must, at a minimum, address the following areas when applicable to a facility: summary of the facility's pollution prevention plan requirements; used oil management; spent solvent management; spill prevention, response and control; fueling procedures; general good housekeeping practices; proper painting procedures; and used battery management.

3.2.3.6 Recordkeeping and Internal Reporting Procedures - A description of incidents (such as spills, or other discharges), along with other information describing the quality and quantity of stormwater discharges shall be included in the plan required under this part. Inspections and maintenance activities shall be documented and records of such activities shall be incorporated into the plan.

3.2.3.7 Non-stormwater Discharges

3.2.3.7.1 The plan shall include a certification that the discharge has been tested or evaluated for the presence of non-stormwater discharges. The certification shall include the identification of potential significant 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 onsite drainage points that were directly observed during the test. Certifications shall be signed in accordance with subpart 7.7 (Signatory Requirements) of this permit. Such certification may not be practical if the facility operating the stormwater discharge associated with industrial activity does not have access to an outfall, manhole, or other point of access to the ultimate conduit which receives the discharge. In such cases, the source identification section of the

stormwater pollution prevention plan shall indicate why the certification required by this part was not practical, along with the identification of potential significant sources of non-stormwater at the site. A discharger that is unable to provide the certification required by this paragraph must notify the Division of Water Resources in accordance with Part 11.P.3.2.3.7.4 (Failure to Certify) of this permit.

3.2.3.7.2 Sources of non-stormwater that are combined with stormwater discharges associated with industrial activity must be identified in the plan. The plan shall identify and ensure the implementation of appropriate pollution prevention measures for the non-stormwater component(s) of the discharge. Any non-stormwater discharges that are not authorized under this permit or another NPDES permit should be brought to the attention of the division's local Environmental Field Office (see list of EFOs on page 14).

3.2.3.7.3 A copy of the NPDES permit issued for vehicle and equipment washwaters or, if an NPDES permit has not yet been issued, a copy of the pending application must be attached to or referenced in the plan. For facilities that discharge vehicle and equipment washwaters to the sanitary sewer system, the operator of the sanitary system and associated treatment plant must be notified. In such cases, a copy of the notification letter must be attached to the plan. If an industrial user permit is issued under a pretreatment program, a copy of that permit must be attached in the plan. In all cases, any permit conditions or pretreatment requirements must be considered in the plan. Washwaters handling must be described in the plan including disposal method (e.g. hauled offsite) and all pertinent documentation (e.g., frequency, volume, destination, etc.).

3.2.3.7.4 Failure to Certify - Any facility that is unable to provide the certification required (testing for non-stormwater discharges), must notify the Division of Water Resources by not later than 180 days after submitting an NOI to be covered by this permit. If the failure to certify is caused by the inability to perform adequate tests or evaluations, such notification shall describe: the procedure of any test conducted for the presence of non-stormwater discharges; the results of such test or other relevant observations; potential sources of non-stormwater discharges to the storm sewer; and why adequate tests for such storm sewers were not feasible. Non-stormwater discharges to waters of the state which are not authorized by an NPDES permit are unlawful, and must be terminated.

3.2.3.7.5 Sediment and Erosion Control - The plan shall identify areas which, due to topography, activities, or other factors, have a high potential for significant soil erosion, and identify structural, vegetative, and/or stabilization measures to be used to limit erosion.

3.2.3.7.6 Management of Runoff - The plan shall contain a narrative consideration of the appropriateness of stormwater management practices (practices other than those which control the generation or source(s) of pollutants) used to divert, infiltrate, reuse, or otherwise manage stormwater runoff in a manner that reduces pollutants in stormwater discharges from the site. The plan shall provide for the implementation and maintenance of measures that the permittee determines to be reasonable and appropriate. The potential of various sources at the facility to contribute pollutants to stormwater discharges associated with industrial activity [see 11.P.3.2.2 (description of potential pollutant sources) of this permit] shall be considered when determining reasonable and appropriate measures. Appropriate measures or other

equivalent measures may include: vegetative swales and practices, reuse of collected stormwater (such as for a process or as an irrigation source), inlet controls (such as oil/water separators), snow management activities, infiltration devices, and wet detention/retention devices.

3.2.4 Comprehensive Site Compliance Evaluation. Qualified personnel shall conduct comprehensive site compliance evaluations at appropriate intervals specified in the SWPPP, but, in no case less than once a year. Such evaluations shall provide:

3.2.4.1 Areas contributing to a stormwater discharge associated with industrial activity shall be visually inspected for evidence of, or the potential for, pollutants entering the drainage system (and potentially waters of the state). Measures to reduce pollutant loadings shall be evaluated to determine whether they are adequate and properly implemented in accordance with the terms of the permit or whether additional control measures are needed. Structural stormwater management measures, sediment and erosion control measures, and other structural pollution prevention measures identified in the plan shall be observed to ensure that they are operating correctly. A visual inspection of equipment needed to implement the plan, such as spill response equipment, shall be made.

3.2.4.2 Based on the results of the evaluation, the description of potential pollutant sources identified in the plan in accordance with Part 11.P.3.2.2 (Description of Potential Pollutant Sources) of this permit and pollution prevention measures and controls identified in the plan in accordance with paragraph 11.P.3.2.3 (Measures and Controls) of this permit shall be revised as appropriate within 2 weeks of such evaluation and shall provide for implementation of any changes to the plan in a timely manner, but in no case more than 12 weeks after the evaluation.

3.2.4.3 A report summarizing the scope of the evaluation, personnel making the evaluation, the date(s) of the evaluation, major observations relating to the implementation of the stormwater pollution prevention plan, and actions taken in accordance with paragraph 11.P.3.2.3.2 (above) of the permit shall be made and retained as part of the stormwater pollution prevention plan for at least 3 years after the date of the evaluation. The report shall identify any incidents of noncompliance. Where a report does not identify any incidents of noncompliance, the report shall contain a certification that the facility is in compliance with the stormwater pollution prevention plan and this permit. The report shall be signed in accordance with subpart 7.7 (Signatory Requirements) of this permit.

3.2.4.4 Where compliance evaluation schedules overlap with inspections required under 3.2.3.4, the compliance evaluation may be conducted in place of one such inspection.

4. Numeric Effluent Limitations

There are no additional numeric effluent limitations beyond those described in subpart 5.2 (Coal Pile Runoff) of the TMSP.

5. Monitoring and Reporting Requirements

Quarterly Visual Examination of Stormwater Quality. Facilities shall perform and document a visual examination of a stormwater discharge associated with industrial activity from each outfall, except discharges exempted below. The examination must be made at least once in each designated period [described in paragraph (1) below] during daylight hours unless there is insufficient rainfall or snow melt to produce a runoff event.

5.1 Examinations shall be conducted in each of the following periods for the purposes of visually inspecting stormwater quality associated with stormwater runoff or snowmelt: January through March; April through June; July through September; and October through December.

5.2 Examinations shall be made of samples collected within the first 30 minutes (or as soon thereafter as practical, but not to exceed 1 hour) of when the runoff or snowmelt begins discharging. The examinations shall document observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution. The examination must be conducted in a well-lit area. No analytical tests are required to be performed on the samples. All such samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. Where practicable, the same individual should carry out the collection and examination of discharges for the entire permit term.

5.3 Visual examination reports must be maintained onsite in the pollution prevention plan or with other compliance records. The report shall include the examination date and time, examination personnel, the nature of the discharge (i.e., runoff or snow melt), visual quality of the stormwater discharge (including observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution), and probable sources of any observed stormwater contamination.

5.4 When a facility has two or more outfalls that, based on a consideration of industrial activity, significant materials, and management practices and activities within the area drained by the outfall, the permittee reasonably believes discharge substantially identical effluents, the permittee may collect a sample of effluent of one of such outfalls and report that the examination data also applies to the substantially identical outfall(s) provided that the permittee includes in the stormwater pollution prevention plan a description of the location of the outfalls and explains in detail why the outfalls are expected to discharge substantially identical effluents. In addition, for Each outfall that the permittee believes is representative, an estimate of the size of the drainage area (in square feet) and an estimate of the runoff coefficient of the drainage area [e.g., low (under 40 percent), medium (40 to 65 percent), or high (above 65 percent)] shall be provided in the plan.

5.5 When a discharger is unable to collect samples over the course of the visual examination period as a result of adverse climatic conditions, the discharger must document the reason for not performing the visual examination and retain this documentation onsite with the records of the visual examinations. Adverse weather conditions which may prohibit the collection of samples include weather conditions that create dangerous conditions for personnel (such as

local flooding, high winds, hurricane, tornadoes, electrical storms, etc.) or otherwise make the collection of a sample impracticable (drought, extended frozen conditions, etc.).

5.6 When a discharger is unable to conduct visual stormwater examinations at an inactive and unstaffed site, the operator of the facility may exercise a waiver of the monitoring requirement as long as the facility remains inactive and unstaffed. The facility must maintain a certification with the pollution prevention plan stating that the site is inactive and unstaffed so that performing visual examinations during a qualifying event is not feasible

APPENDIX C

STORM WATER POLLUTION PREVENTION TEAM

WILLOUGHBY OIL-SOMERVILLE, TN

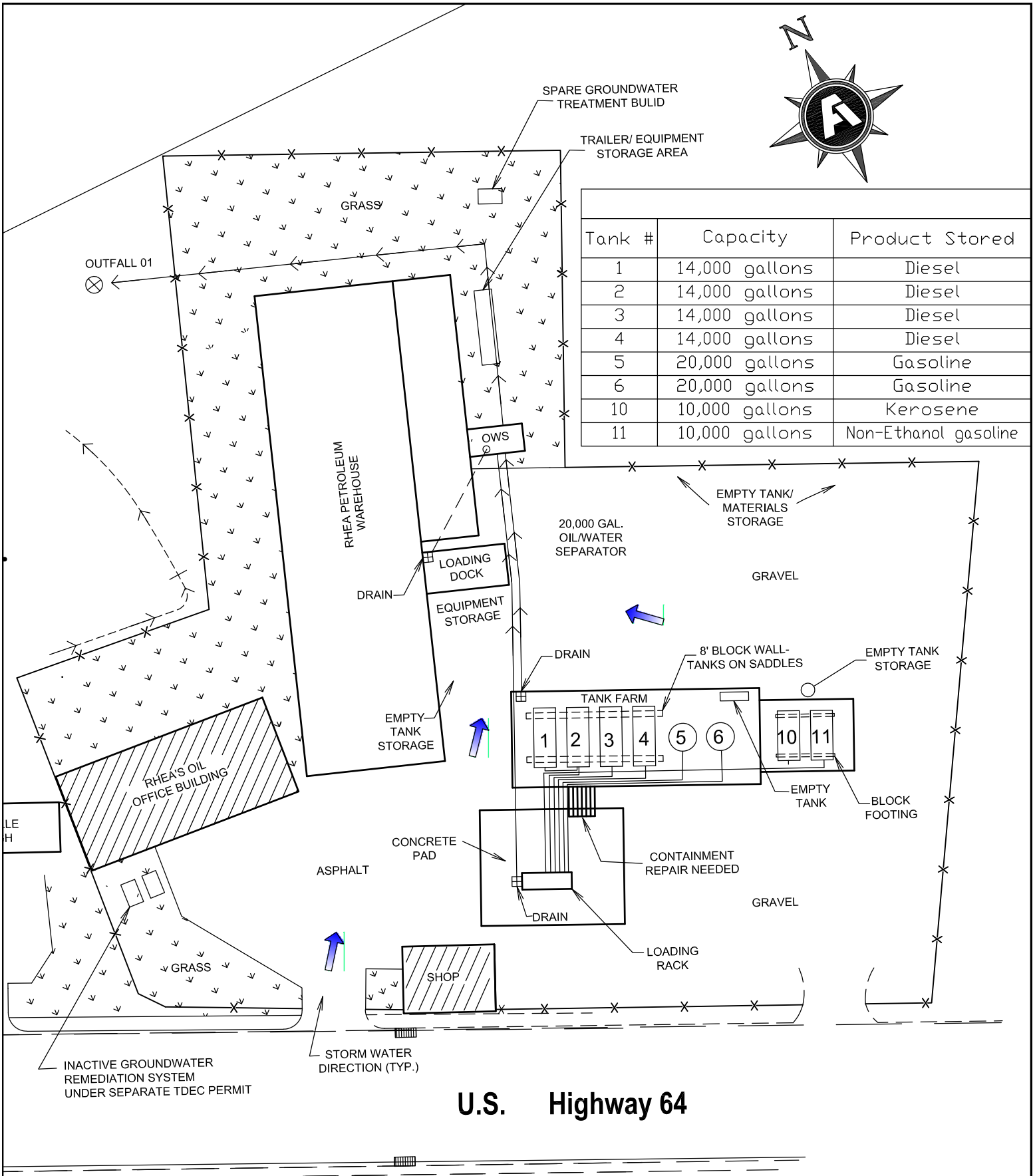
Pollution Prevention Team

Name	Title	Responsibilities
David Lucius	Plant Manager	Administrator of the SWPPP and to insure proper implementation of the SWPPP
David Lucius	Plant Manager	Training and familiarizing employees with the SWPPP requirements
Bubba	Supervisor	Enforce upkeep of the Best Management Practices and ensuring that the inspections are performed
Bubba	Supervisor	Execute any mechanical changes occurring in the plant relating to SWPPP

All team members can be reached at 731-609-4000. David Lucius can also be reached on the cell phone at 731-609-4000.

APPENDIX D

FIGURES

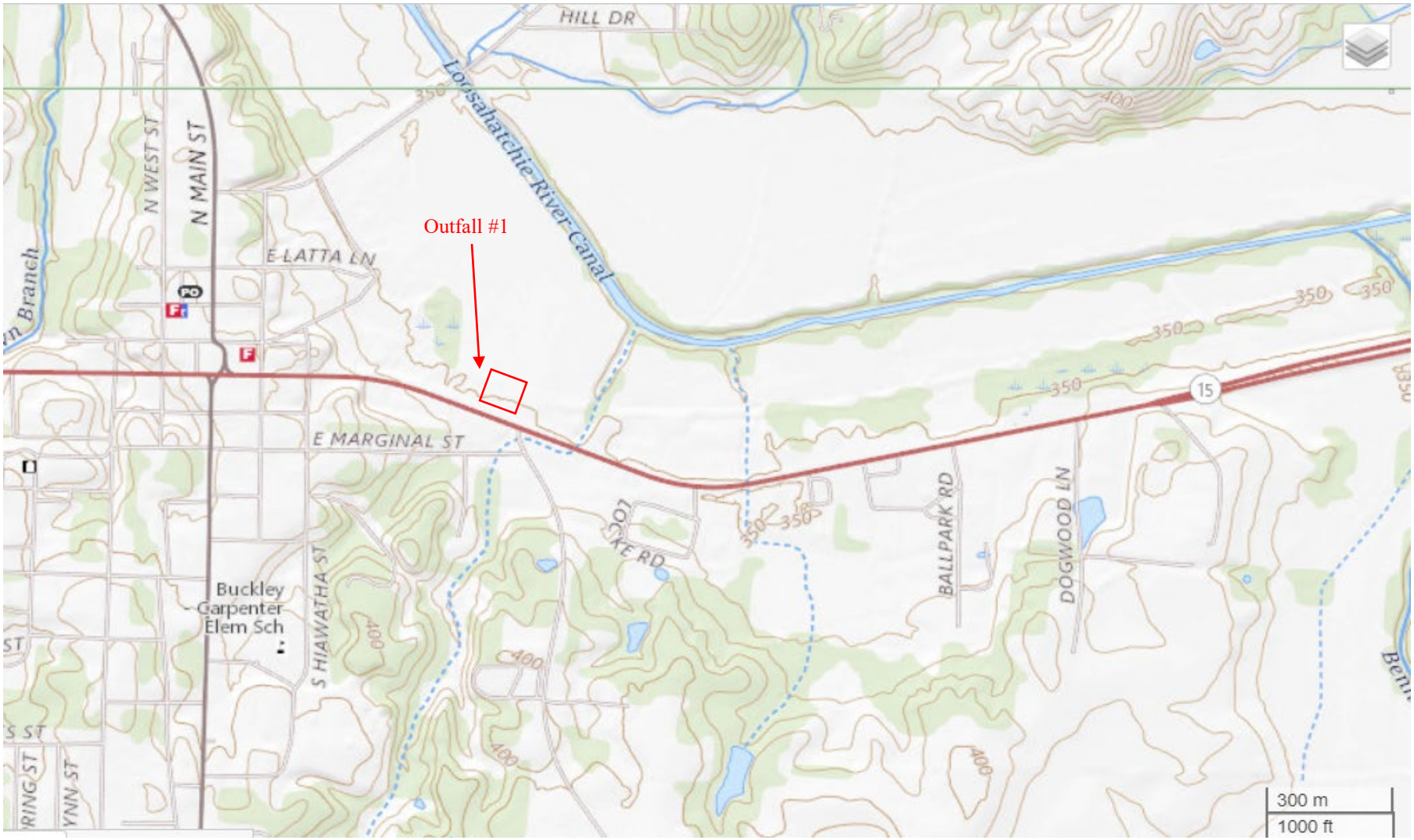


Tank #	Capacity	Product Stored
1	14,000 gallons	Diesel
2	14,000 gallons	Diesel
3	14,000 gallons	Diesel
4	14,000 gallons	Diesel
5	20,000 gallons	Gasoline
6	20,000 gallons	Gasoline
10	10,000 gallons	Kerosene
11	10,000 gallons	Non-Ethanol gasoline

FISHER ARNOLD
ENGINEERING INTEGRATION
9180 Crestwyn Hills Drive | Memphis, Tennessee 38125-8538
901.748.1811 | Fax: 901.748.3115 | www.fisherarnold.com

SOMERVILLE BULK PLANT
17155 U.S. HIGHWAY 64
SOMERVILLE, TN
SWPPP SITE MAP

DESIGN: F&A	DRAWN: B.S.	SCALE: N.T.S.	FIGURE
DATE: 10/2020	FACILITY ID: TNR051866		
WILLOUGH.0001EN			1



-Subject Property

LOCATION MAP
Somerville Bulk Facility
17155 Highway 64
Somerville, TN

DATE: 10/2020	SOURCE: USGS Topographic Maps		FIGURE 2
DRAWN BY: ER	SCALE: NTS	PROJECT NO. WILLOUGH.0001EN	

FISHER ARNOLD
ENGINEERS | DESIGNERS | CONSULTANTS | PLANNERS
9180 Crestwyn Hills Drive | Memphis, TN 38125
888.583.9724 | www.fisherarnold.com


325
© 2020 Google

APPENDIX E

NON-STORM WATER DISCHARGE CERTIFICATION

NON-STORM WATER DISCHARGE CERTIFICATION

Facility Name: Willoughby Oil

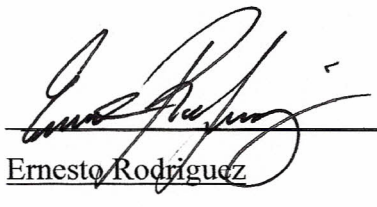
Facility Address: Willoughby Oil
17155 U.S. Highway 64
Somerville, Tennessee

Certification:

I certify under penalty of law that the point source storm water discharge from this facility was evaluated for the presence of non-storm water discharges. This was done under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information required.

The results of visual evaluation confirm the absence of non-storm water discharges in the storm water point source discharges, with the exception of condensate drainage into Outfall #1. Condensate drainage is allowed under the current Storm Water Permit.

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information 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.

Signature: 

Name: Ernesto Rodriguez

Title: Consultant, Fisher & Arnold, Inc.

Date: 9/23/2020

APPENDIX F

ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION AND CERTIFICATION

NPDES Permit Tracking No.:
TNR051866

Annual Comprehensive Site Compliance Evaluation

A. GENERAL INFORMATION

1. Facility Name: Willoughby, Inc.

2. NPDES Permit Tracking No.: TNR051866

3. Facility Physical Address:

a. Street: 1715 U.S. Highway 64

b. City: Somerville c. State: TN d. Zip Code: 38068-

4. Lead Inspectors Name: David Lucius Title: Plant Manager

Additional Inspectors Name(s): Bubba Johnson Supervisor

5. Contact Person: Lee Willoughby Title: Vice President

Phone: 731-925-3953 Ext. E-mail: lee@willoughby.com

6. Inspection Date: 09/23/2020

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☑ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
TNR051866

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☑ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☑ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? 01

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:
TNR051866

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 01:

1. Brief Description**:**

Ovehead Pipe Rack Area

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA 02:

1. Brief Description:

Fuel aboveground Storage Tank Farm

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA 03:

Brief Description:

Oil Water Separator Area

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
TNR051866

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA 04:

1. Brief Description:

Miscellaneous Storage Areas on property.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
TNR051866

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ☐☐ of ☐☐ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: ☐☐/☐☐/☐☐☐☐

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: ☐☐/☐☐/☐☐☐☐

10. Date correction action completed: ☐☐/☐☐/☐☐☐☐ or expected to be completed: ☐☐/☐☐/☐☐☐☐

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
TNR051866

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? YES ☑ NO ☐

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

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

Authorized Representative Printed Name: Lee Willoughby Title: Vice President

Signature: _____ Date Signed: _____

APPENDIX G

ANNUAL EMPLOYEE TRAINING FORM

EMPLOYEE STORMWATER TRAINING FORM

Facility: Willoughby, Inc. – Somerville, TN

Date:_____

Instructor(s)_____

Description of training content:

_____
_____
_____
_____

Employee Name	Employee Signature
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

APPENDIX H

QUARTERLY VISUAL INSPECTION FORMS

Willoughby Oil
17155 Highway 64
Somerville, TN 38068

RECORD OF QUARTERLY OR PERIODIC STORM WATER VISUAL EXAMINATION

Name of Inspector:

Date: Time of First Runoff:
Time of Visual Exam:
Rainfall (inches):
Period of Time Since last rainfall exceeding 0.1 inches:

Outfall inspected (01)
Outfall type (storm drain, pipe, grassed, rock, etc):
Location:

Results of Inspection: (List observations of following categories, list other obvious indicators of storm water pollution):

Color:
Odor:
Clarity:
Floating Solids:
Scum:
Foam:
Oil Sheen:
Sludge Present:
Stains on conveyance (if applicable):
Plant life present and healthy near outfall:
Estimate flow rate of storm water runoff:
Other Indicators/comments:

Probable Sources of Observed Pollution, if any:

Corrective Measures (follow up):

Signature of Inspector: _____Date: _____

Signature of Site SWPPP Manager: _____Date: _____

Willoughby Oil
17155 Highway 64
Somerville, TN 38068
RECORD OF QUARTERLY STORM WATER VISUAL EXAMINATION

Name of Inspector:

Date: Time of First Runoff:
Time of Visual Exam:
Rainfall (inches):
Period of Time Since last rainfall exceeding 0.1 inches:

Outfall inspected (01)
Outfall type (storm drain, pipe, grassed, rock, etc):
Location:

Results of Inspection: (List observations of following categories, list other obvious indicators of storm water pollution):

Color:
Odor:
Clarity:
Floating Solids:
Scum:
Foam:
Oil Sheen:
Sludge Present:
Stains on conveyance (if applicable):
Plant life present and healthy near outfall:
Estimate flow rate of storm water runoff:
Other Indicators/comments:

Probable Sources of Observed Pollution, if any:

Corrective Measures (follow up):

Signature of Inspector: _____Date: _____

Signature of Site SWPPP Manager: _____Date: _____

Willoughby Oil
17155 Highway 64
Somerville, TN 38068
RECORD OF QUARTERLY STORM WATER VISUAL EXAMINATION

Name of Inspector:

Date: Time of First Runoff:
Time of Visual Exam:
Rainfall (inches):
Period of Time Since last rainfall exceeding 0.1 inches:

Outfall inspected (01)
Outfall type (storm drain, pipe, grassed, rock, etc):
Location:

Results of Inspection: (List observations of following categories, list other obvious indicators of storm water pollution):

Color:
Odor:
Clarity:
Floating Solids:
Scum:
Foam:
Oil Sheen:
Sludge Present:
Stains on conveyance (if applicable):
Plant life present and healthy near outfall:
Estimate flow rate of storm water runoff:
Other Indicators/comments:

Probable Sources of Observed Pollution, if any:

Corrective Measures (follow up):

Signature of Inspector: _____Date: _____

Signature of Site SWPPP Manager: _____Date: _____

Willoughby Oil
17155 Highway 64
Somerville, TN 38068
RECORD OF QUARTERLY STORM WATER VISUAL EXAMINATION

Name of Inspector:

Date: Time of First Runoff:
Time of Visual Exam:
Rainfall (inches):
Period of Time Since last rainfall exceeding 0.1 inches:

Outfall inspected (01)
Outfall type (storm drain, pipe, grassed, rock, etc):
Location:

Results of Inspection: (List observations of following categories, list other obvious indicators of storm water pollution):

Color:
Odor:
Clarity:
Floating Solids:
Scum:
Foam:
Oil Sheen:
Sludge Present:
Stains on conveyance (if applicable):
Plant life present and healthy near outfall:
Estimate flow rate of storm water runoff:
Other Indicators/comments:

Probable Sources of Observed Pollution, if any:

Corrective Measures (follow up):

Signature of Inspector: _____Date: _____

Signature of Site SWPPP Manager: _____Date: _____

Willoughby Oil
17155 Highway 64
Somerville, TN 38068
RECORD OF QUARTERLY STORM WATER VISUAL EXAMINATION

Name of Inspector:

Date: Time of First Runoff:
Time of Visual Exam:
Rainfall (inches):
Period of Time Since last rainfall exceeding 0.1 inches:

Outfall inspected (01)
Outfall type (storm drain, pipe, grassed, rock, etc):
Location:

Results of Inspection: (List observations of following categories, list other obvious indicators of storm water pollution):

Color:
Odor:
Clarity:
Floating Solids:
Scum:
Foam:
Oil Sheen:
Sludge Present:
Stains on conveyance (if applicable):
Plant life present and healthy near outfall:
Estimate flow rate of storm water runoff:
Other Indicators/comments:

Probable Sources of Observed Pollution, if any:

Corrective Measures (follow up):

Signature of Inspector: _____Date: _____

Signature of Site SWPPP Manager: _____Date: _____

APPENDIX I

SPILL REPORT FORM

Willoughby, Inc.
Spill Report Form

Date of Spill: _____
Spill Reporter's Name- Last: _____, First: _____, M.I.: ____
Work Phone: _____, Evening Phone: _____
Facility Name: _____**Willoughby Oil** _____
Facility Location (street address): ____**17155 Highway64**
City: ____**Somerville** County: ___**Fayette**_____, State: ___**TN**____, ZIP code: ___**38068**
Phone number: _____.
Latitude of Main Entrance to Facility: ____ Degrees ___ Minutes ___ Seconds
Longitude of Main Entrance to Facility: ____ Degrees __ Minutes __ Seconds
Were Materials Discharged? _____(Y/N), Confidential? _____(Y/N)
Meeting Federal Obligations to Report? _____(Y/N)
Date Called: _____, Time Called: _____(AM/PM)
Calling for Responsible Party? _____(Y/N).
Incident Description
Source and/or Likely Cause of Discharges of oil: _____
Date of Spill: _____, Time of Spill: _____(AM/PM)
Spill Location (closest street address): _____
City: _____, County: _____, State: _____, ZIP code: _____
Section: _____, Township: _____, Range: _____, Borough: ____
Distance of Spill from City: _____, Units of Measure: _____
Direction from City to Spill: _____
Container Type: _____
Tank Oil Storage Capacity: _____, Units of Measure: _____
Facility Oil Storage Capacity: _____, Units of Measure: _____.
Material Discharged

CHRIS Code	Discharged Quantity	Unit of Measure	Quantity in Water	Unit of Measure
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

Response Action
Actions Taken to Correct, Control or Mitigate Incident:
_____.
Impact
Number of Injuries: _____, Number of Deaths: _____
Were there Evacuations? ____(Y/N), Number Evacuated: _____
Wax there any Damage? ___(Y/N), Damage in Dollars (approximate): _____
Medium Affected: _____, Description: _____
More Information about Medium: _____.
Additional Information

Any information about the incident not recorded elsewhere in the report:
Caller Notifications
EPA? ___ (Y/N), US Coast Guard? ___(Y/N), State? ___(Y/N)
Other ? _____ (Y/N), Describe: _____