Stormwater Pollution Prevention Plan

SRM Concrete, LLC

1432 Gateway Drive

Gallatin, TN 37066

Ready Mixed Concrete Production

SWPPP Contact(s):

Eric Endsley – Plant Manager – (615)206-9941

Jim White – Environmental Director – (931)703-4077

Mike Zagula – COO - (615)355-1028

Jeff Hollingshead – CEO – (615)355-1028

SWPPP Preparation Date:

11/03/2020

General Information

This Storm Water Pollution Prevention Plan (SWPPP) is developed in accordance with the Tennessee General NPDES Permit (TNG110XXX) for discharges of storm water runoff and process wastewater associated with ready mixed concrete facilities.

It is the intention and goal of the RMCP and this SWPPP that any discharge from the facility described in this document has no objectionable color contrast to the water body that receives it, or have visible floating scum, oil or other matter in the runoff discharge. The permittee shall use best management practices (BMPs) and good engineering practices to prevent contamination of the wastewater and storm water runoff discharge from materials associated with activities at ready mix concrete plants.

I certify under penalty of law that this document and all attachments were prepared under my direction as 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.

Representative of owner | Signature | Date

X

Jeff Hollingshead
CEO

General Description of Facility and/or Operations

Name of Facility: SRM Concrete Gallatin, TN

Street: 1432 Gateway Drive

City: Gallatin State: TN Zip Code: 37066

Latitude: Longitude:

36° 24’ 23.3964” N (degrees, minutes, seconds) 86° 22’ 38.3196’’ W (degrees, minutes, second

From Google Earth Maps

Storm water runoff from the subject site or facility is/are received by: wet weather conveyance to an unnamed tributary to Old Hickory Reservoir.

Stormwater Pollution Prevention Plan

This plan must remain on site for the length of the permit. All inspection and training records must be kept for 3 years as required by the permit. It should be review annually to check for any updates that should be necessary.

Point of Responsibility

Jim White, Environmental Director, is responsible for maintaining and implementing this SWPPP.

The responsible person listed above will identify the facility storm water pollution prevention team, and assign responsibilities, as necessary, to accomplish the requirements of this plan. The Pollution Prevention Team is identified below.

Staff Names	General Responsibilities
Eric Endsley - Plant Manager	Oversees housekeeping, preventative maintenance, spill response coordinator, assist in inspections
Jim White	Coordinate plan development, employee training, keep records and ensure reports are submitted, conduct inspections
Mike Zagula	Assist in coordinating and implementing plan, note any process changes
Jeff Hollingshead	Oversee and manage the process

Each member of the storm water pollution prevention team must have ready access to either an electronic or paper copy of applicable portions of the SWPPP.

General Location Map

See Appendix A

Site Map

See Appendix B

Description of Potential Pollutant Sources

The concrete truck wash-out is a potential source of pollutants. Regular maintenance of the concrete trucks and cleaning the wash-out pits should prevent pollutants from leaving the wash-out pits.

The mixing plant and silo cold potentially spill pollutants. It should be checked regularly for signs of cracking and leaking.

The driving areas are susceptible to pollutants from concrete trucks and personal vehicles.

The retention pond could potentially release pollutants if it is not properly maintained. Material should be removed regularly to prevent build up, which could result in a discharge thru the overflow weir.

Identification of pollutant potential for plant operations

Potential pollutant sources capable of imparting pollutants to storm water found at this site include:

Cement

Fine sand

Aggregates

Oil and Grease

Admixtures

Chemicals

Solvents

Diesel Fuel

Spills and Leaks

No significant spills or leaks of toxic or hazardous pollutants have occurred in the past. Any incidents that occur during the life of the permit shall be reported and a record of all actions taken in response to the spills kept on site for 3 years. Appendix C

STORM WATER MANAGEMENT CONTROLS

Upon reviewing the potential pollutants at this facility, Smyrna Ready Mix Concrete, LLC. prepared a list of Best Management Practices (BMP's). These BMP's will control the discharge of potential pollutants in storm water runoff for each area of concern.

- Employee and Truck Parking Areas:
  Leaking fluids from the parked vehicles may potentially contaminate storm water from these areas. These contaminants may contain gasoline, diesel fuel, transmission fluid, brake fluid, antifreeze, and engine oil. Any leaks or spills that are identified will be immediately cleaned up using absorbent material.

- Fueling Areas:
  Leaking fluids from the parked vehicles and spillage from fueling may potentially contaminate storm water from these areas. These contaminants may contain gasoline, diesel fuel, transmission fluid, brake fluid, antifreeze, hydraulic fluid, and engine oil. The fuel tanks are double walled to prevent leaks in the event of rupture. All fuel pumps are equipped with automatic backpressure shut offs and the fuel pump lines are equipped with breakaway couplings. Any leaks or spills that are identified will be immediately cleaned up using absorbent material.

- Production Areas:
  Ready Mix Concrete is loaded into Ready Mix trucks at the Ready Mix Truck Loading area. Leaking fluids from the parked vehicles may potentially contaminate storm water from these areas. These contaminants may contain gasoline, diesel fuel, transmission fluid, brake fluid, antifreeze, and engine oil. Water generated from production areas is captured and directed toward retention areas for treatment and or recycling.

- Truck Loading and Unloading (stock pile areas):
  Trucks unload sand and gravel in this area. Leaking fluids from vehicles may potentially contaminate storm water from these areas. These contaminants may contain gasoline, diesel fuel, transmission fluid, brake fluid, antifreeze, hydraulic fluid, and engine oil. Any leaks or spills that are identified will be immediately cleaned up using absorbent material. Water generated from this area is captured and directed toward retention areas for treatment and or recycling.

- Truck Wash Areas:
  Truck drums and the exterior of trucks are cleaned in the Truck Wash area. Storm water from this area can be potentially contaminated by wastewater from truck cleaning operations and by leaking fluids from vehicles. Water generated from this area is captured and directed toward retention areas for treatment and or recycling. Any leaks or spills that are identified will be immediately cleaned up using absorbent material.

Measures and Controls

The retention pond is designed to catch all runoff from this site, so it will catch any pollutants that are on the site. This also allows for particles to settle out or coagulate on the surface for removal. .

- The site has submitted an NOI requesting a processed water outfall 001 and a storm water outfall SW1. The processed water sediment basins will capture little to none influent storm water limiting it to mostly only processed water. The plant will be recycling the processed water in order to hope for no discharge. If discharge occurs a sample will be grabbed in accordance to Section 5 of the Tennessee NPDES permit.

Good Housekeeping

Good housekeeping requires the maintenance of areas that may contribute pollutants to stormwater. These areas include material storage areas, truck washout, and truck loading areas. Sweeping and washing of these areas will minimize the presence of pollutants which are exposed to runoff. The frequency required should be evaluated based on daily production, but shall not be less than once per week when cement, aggregates, or fly ash are being handled or otherwise processed in this area.

Regular, frequent, and timely cleaning of leaks and spills prior to contact with stormwater are essential to controlling pollutants in stormwater discharges. Facilities shall prevent or minimize the discharge of spilled cement, aggregate (including sand or gravel), fly ash, settled dust and other significant stormwater pollutants on all areas of the facility including the paved portions of the site. Facilities shall prevent the exposure of fine granular solids such as cement, and fly ash dust to stormwater. Where practicable, these materials shall be stored in enclosed silos, hoppers or buildings, in covered areas, or under covering and conveyed in enclosed equipment.

Preventative Maintenance

A preventative maintenance program shall involve routine inspections and maintenance of stormwater management devices (retention ponds and truck washout areas). Sediment from these locations should be removed periodically to ensure adequate storage is provided.

Admixtures and chemicals, if stored on site, should be in a covered or enclosed location. If a fueling station is located on site, an emergency shut-off switch should be provided and clearly labeled. Storage of these items should be in a secure location and protected with bollards to prevent impact from all vehicle traffic.

Spill Prevention and Response Procedures

Hazardous materials are securely stored to prevent spillage. In the event of a spill, the plant manager and Jim White will be responsible for stopping the spill in a timely manner. Then an effort shall be made to clean up the spill in an appropriate manner for what was spilled. This includes containing the spilled material by enclosing the area, placing protective measures at the retention pond and the property boundary. The retention pond will also be inspected after the next precipitation event, to insure the quality of clean up.

Inspections

SWPPP --SRM Concrete, Mobile Plants, Gallatin, TN

The plant manager or Jim White is to inspect equipment and areas of the facility that have been noted as potential pollutant sources. The inspection frequency shall be once per month at a minimum. The inspection shall take place while the facility is in operation and shall include all of the following areas that are exposed to stormwater at this site: material handling areas, above ground storage tanks, hoppers or silos, dust collection/containment systems, truck wash down and equipment cleaning areas. Written records of the inspections along with actions taken shall be recorded.

Employee Training

All employees in any way responsible for the implementation of any part of the SWPPP must be trained. Training should address topics such as spill response, good housekeeping, truck wash out procedures and material management practices. Any new employee should receive training prior to starting work. Periodic training will take place whenever the SWPPP is modified, new sources of pollutants are identified or production procedures are revised. Training documents will be kept on record on site.

FACILITY DESCRIPTION

Facility Location

Smyrna Ready Mix Concrete, Inc. (Mobile Plants) are located at 1432 Gateway Drive, Gallatin, Tennessee. Figure 1 presents a map showing the location of this site. The facility is approximately a 5.0 acre parcel located in the industrial area of Gallatin, Tennessee. The facility is surrounded by the GTN project.

Site Activities

Smyrna Ready Mix Concrete, Inc. (Gallatin Mobile plants) consist of an office, a fueling station, truck parking area, employee parking area, a ready mix truck loading area, and a mix plant. Based on site activities, Metro Ready Mix Concrete, Inc. falls under the Standard Industrial Classification code of 3273. Typically this facility operates 10 hours per day, 5.5 days per week, and maintains a staff of approximately 7 – 12.

Site Description

The total area of this site is approximately 5.0 acres and approximately 0.5 acres is impervious (i.e., pavement, buildings). The remainder of the site consists of 4.5 acres of gravel lot.

STORM WATER PLAN

There are 5.0 acres noted on the site drawing and the following listed controls are currently being utilized to control stormwater runoff in these areas:

- Area 1 – The production and stockpile areas are graded to direct all stormwater to the basin to the Southwest of the lot. Truck wash areas are pavement and are sloped in a way to capture all the water generated into the reclaim pits. This is a system of four (4) settlement pits through which the water travels in order for the fines to settle out and the water is reclaimed back for use in jobsite activities.

- Area 2 – The stockpile areas are gravel and sloped to direct all stormwater to the sediment basin to the Southwest of the lot.

- Area 3 – The employee and truck parking lot will be kept clean and daily inspected to make sure there are no leaks from any of the vehicles. In the event of a fuel or oil spill from a vehicle that is parked, an absorbent material is applied to the spill and disposed of properly. Truck maintenance is performed at another location.

Note: A chain link fence is surrounding the perimeter of the site.

SWPPP Modifications

This SWPPP is a "living" document and will be modified and updated, as necessary. Actions which can trigger the need for a plan amendment include:

- Facility modifications which may affect runoff quality or quantity
- New operations
- New materials
- New maintenance procedures

All SWPPP modifications will be kept in the log (Table 2) with a description of the modification, the name of the person making it, and the date and signature of that person.

Table 2

Description of modification	Name of person making modification	Date	Signature

Appendix A: General Location Map

Appendix B: Site Map

Appendix C: Spills and Discharges

Period of coverage: Past 3 years

Date	Location/ Outfall	Caller	Incident	Material	Quantity	Cause

Preventive Maintenance Log

Describe Corrective measures	Comments/Corrective Measures/ Date performed

Maintenance conducted by: _____ Date:_____

EMPLOYEE TRAINING PROGRAM

Who:

Office Personnel

Plant Managers

Truck Drivers

Equipment Operators

Shipping and Receiving Crews (if applicable)

Maintenance Personnel (if applicable)

Plant Facility Laborers

Any Other Individual Deemed Necessary

Note: This list may vary. All individuals associated with a plant operation, product, or material that could affect a stormwater runoff will be included in the Employee Training Program.

When:

Employee meetings will be held once a year with ongoing training held individually or as a group as often as needed. The initial training program will begin as soon as possible. Items to be included are:

* **Any environmental/health & safety incidents**
* **Upcoming training sessions**
* **Brief reminders on good housekeeping, spill prevention and response procedures, and material handling practices**
* **Announce any changes to previously discussed plans**
* **Announce any new management practices**

New employees will receive pollution prevention training when hired and will include the above topics. These new employees will then be incorporated into the existing plans' meeting dates.

EMPLOYEE TRAINING TOPICS

Spill Prevention and Response

* **Clearly identify potential spill areas and drainage routes**
* **Familiarize employees with past spill events (if applicable)**
* **Emergency contacts and telephone numbers will be posted in office area**
* **Explain spill clean-up procedures**
* **Post locations of spill clean-up equipment and the persons responsible for using equipment**

Good Housekeeping

* **Review and demonstrate basic clean-up procedures**
* **Clearly indicate proper disposal locations**
* **Review and demonstrate good housekeeping procedures for staff**
* **Be sure employees know where routine clean-up equipment is located**

Materials Handling and Storage

* **Be sure employees are aware of materials which are hazardous, if applicable, and where those materials are stored**
* **Point out any applicable container labels**
* **Show how to fuel vehicles and avoid spillage or topping off of tanks**
* **Make sure employees are aware of proper storage of exposed materials to limit the spreading of these materials around the site**

EMPLOYEE SWPPP ANNUAL TRAINING PROGRAM DOCUMENTATION

On _____ (date) an Employee Training program was held at the Smyrna Ready Mix facility. This training program was performed as a requirement of this company's SWPP Plan, covers all topics as discussed within and was performed The following employees were in attendance: (signatures) Training Presented by:_____

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SPILL COUNTERMEASURES

A. AGENCY NOTIFICATION

The Tennessee Division of Waste Management (TNDWM) has set forth the following criteria for reporting oil spills:

If a measurable quantity has been released and the release consists of less than 25 gallons, a report to the TNDWM is not required. If a spill quantity is not measurable or is unknown, this must be reported to the Division within 24 hours. Any spill releasing more than 25 gallons to the environment must be reported to TNDWM within 24 hours.

These guidelines should be followed for any spill that happens at this facility.

B. AGENCIES WHICH MAY REQUIRE NOTIFICATION

1.	TN Environmental Response Hotline	(800) 258-3300
2.	U.S. EPA Region IV, Atlanta, GA	(404) 347-4062
3.	Local Police/Fire/Ambulance Departments/ County Disaster Squad	911
4.	Outside Consultant/Cleanup Contractor: To be determined by Emergency Response Coordinator TBD	

Any release must also be reported to the proper In House Notification persons so that all other reporting requirements may be met.

C. FACILITY ACTIONS

1. RESPONSIBILITY

Failure to respond and report a spill incident shall be considered a negligent act on the part of an employee and may result in a reprimand, suspension, or termination of employment.

2. IN-HOUSE NOTIFICATION

In the event of a discharge or threat of discharge of materials specified in these plans, the following persons shall be notified immediately, in order of preference:

DAY SHIFT & AFTER HOURS

1.	Jim White, Environmental Director	Office: 615-355-1028 Mobile: 931-703-4077

2. Mike Zagula, COO Office: 615/355-1028
Home:615 394 7769

3. EMPLOYEE ROLE

Smyrna Ready Mix has enacted provisions for the containment and cleanup of spills involving materials specified in these plans. Employees are aware of the availability of materials for small-scale cleanups around this facility and are instructed in the proper setup and use of these materials.

4. EMERGENCY RESPONSE COORDINATOR ROLE

In the event of a release to the environment, it shall be the responsibility of the Emergency Response Coordinator – Mike Zagula/Jim White - to complete the Environmental Investigation Report (See Form 5). This report shall be completed and submitted to Mike Zagula, within 2 hours of a reportable spill incident. After discussions with Mr. White, he shall also be responsible for notifying all appropriate local, state and/or federal agencies.

5. SAFETY COORDINATOR ROLE

It is the Safety Coordinator's responsibility to complete the Environmental Incident Notification Report (See Form 6). He shall gather the appropriate information for completing the form and shall adequately describe the incident, as well as all mitigative measures that have or will be undertaken. This person shall be familiar with all aspects and responsibilities of the Safety Coordinator's role.

FACILITY EQUIPMENT

A. FIXED CONTAINMENT FACILITIES

These items are described under other sections for each material and hazard.

B. OTHER CONTAINMENT AND CLEANUP EQUIPMENT

Various cleanup materials and equipment are available at this facility. Smyrna Ready Mix is dedicated to the idea that containment of a spill is the first major step in minimizing the potential impact to the environment. Toward this end, cleanup materials are available throughout the facility. The materials consist of the following:

Absorbent Pads	Sand
Absorbent booms	Brooms
Shovels	Loaders
Portable fire extinguishers	
Spill response kit	

The availability of these items allows Smyrna Ready Mix to quickly respond to spill incidents.

C. CLEANUP CONSULTATIONS

In case of a significant spill Smyrna Ready Mix shall contact an appropriate consultant to direct cleanup activities.

D. FIRE CONSIDERATIONS

Should a spill event involve combustible materials, accessibility to fire control equipment is critical. Fire extinguishers are strategically located throughout the facility and at all oil and fuel storage areas.

E. PERTINENT RECORDS, MANUALS, REPORTS, INSPECTIONS, ETC.

All records pertaining to inspections of spill hazard areas, employee training, etc. are kept on file in the facility office.

The following inspection lists and inspection schedules are submitted:

Form 1 - PERSONNEL TRAINING (Annually)

Form 2 - ABOVE GROUND STORAGE TANKS (Quarterly)

Structural components of above ground storage tanks, containing oil products, shall be inspected routinely for signs of deterioration or leakage and records of such inspections will be kept. Visible oil leaks will be promptly reported and corrected.

Above ground valves, piping and appurtenances will be regularly examined.

Form 3 - SECONDARY CONTAINMENT (Quarterly)

Structural components of above ground storage containment systems, containing oil products, shall be inspected routinely for signs of deterioration or leakage and records of such inspections will be kept. Visible oil leaks will be promptly corrected.

Form 4 - MONTHLY SELF-INSPECTION (Monthly)

Visual inspections of drummed, barreled storage areas, equipment wash area, yard, drainage patterns, pads/absorbents, fueling areas, equipment/parts storage areas, shop area, etc. Visible problems will be recorded, reported and corrected promptly.

Form 5 - ENVIRONMENTAL INCIDENT INVESTIGATION REPORT

To be filled out only when a spill or environmental mishap occurs.

To be filled out only when a spill or environmental mishap occurs.

Diesel tank inventories are currently performed each week and at each material delivery and will continue to be done in like manner.

F. INSPECTION GUIDELINES

The following inspection guidelines are used by employees during their routine inspections. Working copies of inspections are maintained at the facility office.

1. Aboveground Tanks (AST): Perform visual inspections daily; perform documented inspections weekly and quarterly; report all leaks immediately; inventory each tank weekly using sound stick and conversion table (inches of product to gallons).

2. Aboveground Piping: Conduct visual inspection daily; perform documented inspections weekly and quarterly; report all leaks immediately.

3. Secondary Spill Containment: Perform visual inspections daily; perform documented inspections weekly and quarterly; monitor outdoor containments after all rainfall events; inspect outdoor containment accumulated waters for oily sheen; drainage of outdoor containment waters will comply with all water quality standards.

4. Security: Perform visual inspections of property line weekly. No documentation is proposed for this item.

5. Spill Prevention Equipment: One per week or after any used of spill cleanup materials, inventory spill materials and submit list of needed supplies to appropriate personnel.

MONTHLY SELF INSPECTION

Inspection Description	Comments/Corrective Measures
Drummed, barreled storage areas	
Stockpile Areas	
Equipment Wash Area	
Yard Area	
Drainage Patterns	
Pads/Absorbents	
Fueling Areas	
Silt Control Structures	
Equipment, Parts storage areas	

This inspection was conducted by: _____ Date:_____

STORM WATER MANAGEMENT
ANNUAL INSPECTION

Inspected by:_____
Date: _____
Time: _____

TRUCK WASHOUT & COLLECTION PITS

___ **YES** ___ **NO** **Are water levels in pits being pumped down?**

___ **YES** ___ **NO** **Do solids need to be removed from pits?**

___ **YES** ___ **NO** **Are pit gates unobstructed and functioning properly?**

___ **YES** ___ **NO** **Are all pumps, valve's & hoses functioning properly & in good working order**

STORAGE TANKS (DIESEL FUEL, OIL PRODUCTS, ADMIXTURES

___ **YES** ___ **NO** **Apparent leaks around any tanks.**

___ **YES** ___ **NO** **All valves working properly and free of leaks and hoses replaced if cracked.**

___ **YES** ___ **NO** **Spill control kits accessible, available, and stocked, near all potential spill areas.**

SILO'S & DUST FILTER VENTS

___ **YES** ___ **NO** **Can any releases be seen coming from the systems?**

___ **YES** ___ **NO** **Do the systems function properly?**

SAND, GRAVEL & STONE PILE BINS

___ **YES** ___ **NO** **Are all sand, gravel & stone kept in their respective piles not spreading out?**

___ **YES** ___ **NO** **Is water collecting in or around the stockpiles?**

GENERAL SITE CONDITION

___ **YES** ___ **NO** **Are trash & debris lying around plant areas?**

___ **YES** ___ **NO** **Does anything appear to be out of place?**

COMMENTS:

_____

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ENVIRONMENTAL INCIDENT INVESTIGATION REPORT

The acts of employees and the work conditions that cause environmental incidents can be corrected only when they are known specifically. It is your responsibility to find them and to correct them.

PART I - GENERAL INFORMATION

Name of Employee _____ Age ____ Dept.

Date of Incident _____ Hour _____ AM/PM Exact Location

Job or Activity at Time of Incident

PART II - DESCRIPTION OF INCIDENT (What Happened)

PART III - WHAT IS THE CAUSE OF THE INCIDENT? (Determine the cause by analyzing all the factors concerned. If either the employee, a machine or other physical condition was involved, find out HOW and WHY)

A. Describe Contributing PERSONAL FACTORS:

B. Describe Contributing WORK CONDITIONS:

C. FUNDAMENTAL CAUSE:

PART IV - CORRECTIVE ACTION TAKEN (What have you done or what do you recommend to prevent a recurrence of a similar incident?)

Has it been done? _____ If not, give reason

SUPERVISOR Reviewed and Approved By Date Report Prepared