



STORMWATER POLLUTION PREVENTION PLAN

HARDING METALS, INC.

**42 HARDING DRIVE
NORTHWOOD, NEW HAMPSHIRE**

FOR

**HARDING METALS, INC.
42 HARDING DRIVE
NORTHWOOD, NEW HAMPSHIRE 03261**

BY
NOBIS GROUP®

(800) 394-4182

Nobis Project No. 65150.08

Date: May 26, 2021



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42 HARDING DRIVE
NORTHWOOD, NEW HAMPSHIRE**

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SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Name of Facility: Harding Metals Facility

Street: 42 Harding Drive

City: Northwood

State: NH ZIP Code: 03261

County or Similar Subdivision: Rockingham

Permit Tracking Number: NHR053099

Latitude/Longitude

Latitude:

Longitude:

1. 43°11'38" N (degrees, minutes, seconds)

1. 71°09'19" W (degrees, minutes, seconds)

Method for determining latitude/longitude

USGS topographic map (specify scale:) 1:24,000

Is the facility located in Indian Country?

Yes No

Is this facility considered a Federal Facility?

Yes No

Estimated area of industrial activity at site exposed to stormwater:

9.3 (acres)

1.2 Discharge Information

Does this facility discharge stormwater into an MS4?

Yes No

If yes, name of MS4 operator:

Name(s) of water(s) that receive stormwater from your facility: Mountain Brook

Are any of your discharges directly into any segment of an "impaired" water?

Yes No

If Yes, identify name of the impaired water (and segment, if applicable): Mountain Brook

NHRIV600030705-08

- Identify the pollutant(s) causing the impairment: Mercury
- For pollutants identified, which do you have reason to believe will be present in your discharge? N/A

- For pollutants identified, which have a completed TMDL? Mercury

Do you discharge into receiving water designated as a Tier 2 (or Tier 2.5) water? Yes No

Are any of your stormwater discharges subject to effluent guidelines? Yes No

If Yes, which guidelines apply? Effluent Limitations Associated with Non-Hazardous Waste Landfill in accordance with Section 4.3.

Identify your applicable sector and subsector: Sector L: Landfills, Land Application Sites, and Open Dumps

Sector M: Automobile Salvage Yards

Sector N: Scrap Recycling and Waste Recycling Facilities

1.3 Site Description

The facility is located at 42 Harding Drive in Northwood, New Hampshire. Harding Drive is located off New Hampshire Route 4 near its intersection with New Hampshire Route 202. The facility is used for the recycling of various metal products. The general topography in the vicinity of the facility slopes to the southwest. The entire facility is located in a low-density commercial area of the Town of Northwood, and is surrounded by commercial, residential, and undeveloped properties. Mountain Brook flows near the western property line.

The site is accessed via a driveway from New Hampshire Route 4, which is a paved State road. The site is serviced by an on-site septic system and an on-site well (non-potable water). The site is also serviced by a combination of power and telephone from Harding Drive. The facility does not have any floor drains.

Stormwater runoff from the developed portion of the site generally sheet flows across the site to adjacent swales/ditches that then discharge toward Mountain Brook. Stormwater runoff from the undeveloped portion of the site sheet flows directly to the adjacent wooded areas.

The site is also comprised of two inactive solid waste landfills. The inactive Main Metals Area (MMA) solid waste landfill is approximately 1± acre in size and is located south of the paved area where metal storage and sorting occurs. According to previous reports and site observations, the MMA landfill contains approximately 1,000-cubic yards of steel turnings, sand, sawdust, wooden

pallets, tires, empty steel barrels, and fiber barrels. Available data indicates that approximately 2,000 cubic feet of sand and gravel cover was placed over the landfill to create a level work area to sort metals. An engineered low-permeability cap has not been placed over the MMA solid waste landfill.

The capped Sawdust Disposal Area (SDA) landfill has undergone excavation; segregation and on-site staging of soil, sawdust and other waste material including 70 to 80 drums; and testing of capping materials. During the summer of 1990, soil aeration and closure operations were conducted at the former SDA landfill. The aeration operation was reportedly conducted just north of the current SDA landfill location. After the aeration process had been completed, the treated soil and sawdust materials met the 2 ppm remediation goal based on field-screening results that were confirmed with gas chromatograph analyses. The soil and sawdust were then placed back in the original area of excavation and a glacial till cap was constructed over the material.

The following materials are authorized for receipt and processing at the facility:

- Ferrous scrap metals consisting of iron, steel and cast iron in various forms, such as:
 - A. Prepared Steel – Material of a certain size, thickness and quality requirement to be described as commodity grade prepared scrap. This material requires no further processing.
 - B. Unprepared Steel – Material of miscellaneous size, thickness and quality requiring processing (shearing, cutting, baling, etc.) into prepared steel (above).
 - C. Mixed Steel – Material of miscellaneous size, thickness and quality requiring sorting and processing to create a marketable ferrous material.
 - D. Cast iron materials consisting of, but not limited to; boilers, radiators, obsolete machinery, etc., which are not steel.
 - E. Light iron – Material consisting of light gauge steel, white goods, appliances, roofing material and other sheet steel items generated from households, industrial sources, transfer stations and municipal solid waste facilities.

F. Obsolete machinery and other equipment from manufacturing operations

- Non-Ferrous scrap materials including:
 - A. Aluminum
 - B. Brass
 - C. Copper
 - D. Lead and Lead Acid Batteries
 - E. Stainless Steel and High Temperature Alloys
 - F. Catalytic Convertors
 - G. Any other non-ferrous recyclable materials that have value

- Electronic Scrap

- Non – Metallic Scrap
 - A. Office Paper
 - B. Cardboard
 - C. Miscellaneous Plastics

- Automobiles for Salvage

The following items are prohibited for processing at the facility:

- A. Hazardous material and hazardous waste
- B. Sludge and septage material
- C. Contained gaseous material
- D. Infectious material
- E. Explosives or explosive materials
- F. TV's or CRT's

1.4 Contact Information/Responsible Parties

Facility Operator (s):

Name: Harding Metals, Inc.

Address: 42 Harding Drive

City, State, Zip Code: Northwood, NH 03261

Telephone Number: (603) 942-5573

Facility Owner (s):

Name: Harding Metals Inc.

Address: 42 Harding Drive

City, State, Zip Code: Northwood, NH 03261

Telephone Number: (603) 942-5573

Additional SWPPP Contact:

Name: Kevin Campbell

Telephone number: 603-942-5573

Email address: kevin@hardingmetals.com

Fax number: 603-942-5646

1.5 Stormwater Pollution Prevention Team

| Staff Names | Individual Responsibilities |
|--|---|
| Kevin Campbell | SWPPP Coordinator, responsible for the following: <ul style="list-style-type: none"> • SPCC Coordinator; • SWPPP Training Coordinator; • Authorizes Installation and Implementation of Stormwater BMPs; • Conducts Routine Facility Inspections; • Conducts Quarterly Discharge Monitoring (Visual Inspection); • Conducts and Prepares Quarterly and Annual Comprehensive Site Evaluations; • Prepares SWPPP Modifications; • Coordinates Benchmark Sampling |
| The following Harding Metals Employees will assist the SWPPP Coordinator with items listed above: | |
| Dan Daley | |
| Joseph Harding | |
| Edwin Harding IV | |
| Robert Chadbourn | |
| Scott Phinney | |
| Eastern Analytical | Stormwater Sampling and Laboratory Consultant |
| Nobis Group | Stormwater Consultant |

1.6 Activities at the Facility

The operations at this facility for the processing of various recycled metals are as follows:

- Transport used metals materials and automobile batteries on-site;
- Separate, process, and stockpile materials in designated areas within processing buildings and in the yard. Note that the site does not contain briquetters, shredders, compactors, engine block breakers, cast iron breakers, wire choppers or turning crushers;
- Transfer separated materials to delivery trucks for transport to the appropriate facility.

Automobile salvage operations at this facility are as follows:

- Transport used automobiles on-site;
- Drain and capture remaining fuels, engine oils, lubricants, and other fluids from automobiles;
- Crush automobiles in vehicle crusher;
- Store processed automobiles until transport to the appropriate facility.

Additional on-site operations include but are not limited to:

- Fueling operational equipment and vehicles;
- Vehicle maintenance.

Upon entering the Harding Metals, Inc. facility from Route 4 there is a main gate which is open from 6:00 am through 4:00 pm Monday through Friday.

The Maintenance Shop - Building #4, is located on the left-hand side of the drive upon entering the facility. This is where routine maintenance is performed on the equipment. It is also where the service and maintenance records are kept for the entire fleet of equipment.

Continuing down the drive, there is a sand storage area and truck and box trailer parking area on the left. A large gravel lot on the right is utilized for parking of roll-off containers, fleet trucks, employee parking, and overflow parking of vehicles for salvage.

Building #1 is located on the right, beyond a paved employee parking lot. The building consists of the Main Office area where employees greet customers, check to see what they are dropping off, weigh vehicles on the Certified Truck Scales (located in the main driveway adjacent to Building #1), and then provide directions to the proper area for drop off. After materials have been inspected and received in the yard, customers return to the main office for payment.

Building #1 is also the primary location for unloading Harding's box trailers and other larger scrap dealer's box trailers. When unloading, the material is inspected, weighed, and documented in the computer system. Once it has been documented it is staged for transfer in the proper areas, stockpiles or bins for temporary storage. Higher value materials are stored inside this building until they can be shipped out. Examples include coppers, brass, and different grades of tool steel and industrial alloys. Materials are also shipped from Building #1 as well.

Building #1 is also used as an industrial alloy and tool steel inspection area. These alloys are dumped onto a steel sorting table where random samples are checked with a Niton XRF analyzer. After the alloys are inspected they are packed in either a Gaylord box, super sack or 55 open head drum so they can be inventoried and stored until shipment.

Building #3, located to the left proceeding down the driveway, is the Spinner Building. This building is used for unloading small commercial and residential customers. There are also several smaller bins and drums located inside around the perimeter of this area that are used for temporary storage of recently purchased materials. Building #3 also houses equipment for sorting and processing materials, including a centrifuge which removes the fluids from non-ferrous turnings and chips, primarily copper and brass. The fluids are captured in a 275 gallon tote and stored until an authorized disposal service (Safety-Kleen) removes them from the facility. Once chips have been spun they are fed into super sacks, weighed and tagged for inventory and stored until shipment.

Building #2, located behind Building #1, is the Aluminum Building. It contains two-horizontal balers used to compress or condense materials to prepare them for a mill or further processing. One baler is located inside the building, and the other baler is located partially under roof cover. Examples of materials that get baled include stainless steel, copper, aluminum, tin cans, cardboard, plastics and some types of steel bushings. Materials are transferred from stockpiles or bins to the baler belt. Once baled, the material is weighed and tagged for inventory and stored inside the building until shipment.

Beyond the site buildings, in the southern portion of the Site, is the steel yard/stockpile area. Materials are stored in uncovered stockpiles, separated by concrete blocks. All stockpiles in this area are on a concrete pad. Beginning from the north and working around to the southeast are the following:

- Vehicle processing area, processed vehicle storage, and tire storage.
- 430 stainless steel. As the stockpile approaches a marketable quantity, the materials are loaded into open top dump trailers.

- Irony aluminum. As the material accumulates to a marketable amount, it is loaded into a 30-yard roll-off with a scrap handler or front-end loader and removed from the site.
- Electric motors.
- Cast aluminum.
- 18-8 stainless steel “contaminated” with other grades of steel or other metals.
- Clean 18-8 stainless steel.
- #1 bushling.
- Steel wire.

The northern side of the stockpile area contains the following materials, from north to southeast:

- Light iron.
- 10-08 bushling.
- Unprepared steel.
- Prepared steel.

Within the paved area around Buildings #1 and #2, stockpiled materials are stored in open walled bunkers underlain by pavement or concrete pads. Metal shavings piles (turnings) are located in a covered three-sided building and located behind a drain that captures any fluids. The fluids are directed to an oil/water separator/evaporator and the oil is containerized for removal from the site. The other materials stored in this area are stockpiled until they can be baled and removed from the site.

A covered three-sided building on the southwestern portion of the concrete-surfaced area, adjacent to the MMA landfill and steel yard/stockpile area, is used to process used automobiles

for salvage. The vehicles are elevated on a lift where all remaining fluids are drained and captured. The vehicles are then sent to a crusher before being stockpiled to await transport off-site. The crusher and vehicle stockpile area are located to the southeast of the covered three-sided building.

There are 20 storage box trailers that are used to store materials under cover. Trailers #1 through #13 are used to store gaylord boxes, titanium turnings, brass, copper turnings bagged for shipment, lead, die cast, lead acid batteries, office paper, plastic, and new drums purchased for customers. The trailer storage is managed by how materials are shipped.

Storage trailers #14 – 18 are located in front of Building #2 and include sealed electric motor units, ballasts, copper & brass turnings packaged for shipment and various grades of tool steel packaged ready for shipment.

Storage trailers #19-21 are located adjacent to the metal shavings building and store mixed transformers, copper yokes, and small boxed stainless parts.

Refer to Figures 2, 3A, and 3B which depict the building and stockpile locations.

1.7 Locus Map

A Locus Map for this facility is included with this document. Refer to Figure 1.

1.8 Site Plans

Refer to Figure 2 which depicts the existing conditions plan and sampling locations for the facility.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Automobile Salvage Yards Facilities and Associated Pollutants

| Exposed | Not Exposed | COMMON ACTIVITIES, POLLUTANT SOURCES, AND ASSOCIATED POLLUTANTS | | |
|-------------------------------------|-------------------------------------|---|---|--|
| | | Activity | Pollutant Source | Pollutant |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Stockpiling and storage of vehicles (including loading and unloading). | Leaking of various fluids from used automotive engines, radiators, brake fluid reservoirs, transmission housings, other vehicle parts, and lead-acid from batteries during loading/unloading | Oil and grease, lubricants, transmission and brake fluids, gasoline, diesel fuel, battery acid, lead acid, antifreeze, benzene, chemical residue. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | | Deterioration/corrosion of materials. Exposed Materials Include: <ul style="list-style-type: none"> • Aluminum • Aluminum Copper Radiators • Stainless Steel • Iron and Cut Grade Steel • Cast Iron • Copper • Magnesium • Zinc • Die Cast • Manganese • Electric Motors | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Material processing: Draining fluids from combustion engines, radiators, transmissions, fuel systems, brake systems. | Spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections, worn gaskets, leaking transmissions, radiators, crankcases, brake systems, leaking battery casings and/or corroded terminals. | Accumulated particulate matter, oil/lubricants, gas/diesel fuel, fuel additives, antifreeze (ethylene glycol), battery acid, products of incomplete combustion, brake fluid, transmission fluid. |

| Exposed | Not Exposed | COMMON ACTIVITIES, POLLUTANT SOURCES, AND ASSOCIATED POLLUTANTS | | |
|-------------------------------------|--------------------------|--|--|---|
| | | Activity | Pollutant Source | Pollutant |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Material processing: Material handling systems (forklifts, cranes, and conveyors) | Spills and leaks from fuel tanks, hydraulic and oil reservoirs due to malfunction parts (e.g., worn gaskets and parts, leaking hose connections, and faulty seals). | Hydraulic fluids, oils, fuels and fuel additives, grease and other lubricants, accumulated particulate matter, chemical additives, mercury, lead, battery acid. |
| N/A | N/A | | Damaged or faulty electrical switches (mercury filled). | |
| N/A | N/A | | Damaged or leaking battery casings, including exposed corroded battery terminals. | |
| N/A | N/A | | Damaged or worn bearing housings. | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Material processing: Hydraulic equipment and systems, vehicle crusher | Particulate/residue from material processing, spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections/fittings, leaking gaskets. | Hydraulic fluids/oils, lubricants, particulate matter from combustion engines, heavy metals (nonferrous, ferrous). |

2.2 Scrap and Waste Recycling Facilities (non-source separated, non-liquid recyclable materials) and Recycling Facilities and Associated Pollutants

| Exposed | Not Exposed | COMMON ACTIVITIES, POLLUTANT SOURCES, AND ASSOCIATED POLLUTANTS | | |
|-------------------------------------|--------------------------|---|--|--|
| | | Activity | Pollutant Source | Pollutant |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | | Leaking of various fluids from used automotive engines, radiators, brake fluid reservoirs, transmission housings, other vehicle parts, and lead-acid from batteries during loading/unloading | PCBs, oil and grease, lubricants, paint pigments or additives, heavy metals, ionizing radioactive isotopes, |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Stockpiling and storage of materials (including loading and unloading). | Deterioration/corrosion of materials. Exposed Materials Include: <ul style="list-style-type: none"> • Cardboard • Beverage Containers • #1 and #2 Wire • Aluminum • Aluminum Copper Radiators • Stainless Steel • Iron and Cut Grade Steel • Cast Iron • Copper • Magnesium • Zinc • Die Cast • Manganese • Electric Motors • Brass | transmission and brake fluids, fuel, battery acid, lead acid, antifreeze, benzene, chemical residue, heating oil, petroleum products, solvents, ionizing radioactive isotopes, infectious/bacterial contamination, asbestos, metals, total Kjeldahl nitrogen (TKN), battery acid, oily wastes, chemical residue. |

| Exposed | Not Exposed | COMMON ACTIVITIES, POLLUTANT SOURCES, AND ASSOCIATED POLLUTANTS | | |
|-------------------------------------|--------------------------|---|--|---|
| | | Activity | Pollutant Source | Pollutant |
| Not Applicable | Not Applicable | Material processing: Air pollution equipment (including incinerators, furnaces, wet scrubbers, filter houses, and bag houses) | Normal equipment operations that include the collection and disposal of filter bag material and ash, process wastewater from scrubbers, accumulation of particulate matter around leaking joint connections, malfunctioning pumps and motors (e.g., leaking gaskets, seals or pipe connections, leaking oil-filled transformer casings). | Hydraulic fluids, oils, fuels, grease and other lubricants, accumulated particulate matter, chemical additives, and PCBs from oil-filled electrical equipment. |
| Not Applicable | Not Applicable | Material processing: Combustion engines | Spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections, worn gaskets, leaking transmissions, crankcases, and brake systems (if applicable), leaking battery casings and/or corroded terminals. | Accumulated particulate matter, oil/lubricants, gas/diesel fuel, fuel additives, antifreeze (ethylene glycol), battery acid, and products of incomplete combustion. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Material processing: Material handling systems (forklifts, cranes, and conveyors) | Spills and leaks from fuel tanks, hydraulic and oil reservoirs due to malfunction parts (e.g., worn gaskets and parts, leaking hose connections, and faulty seals). | Hydraulic fluids, oils, fuels and fuel additives, grease and other lubricants, accumulated particulate matter, chemical additives, mercury, lead, battery acid. |
| N/A | N/A | | Damaged or faulty electrical switches (mercury filled). | |
| N/A | N/A | | Damaged or leaking battery casings, including exposed corroded battery terminals. | |

| Exposed | Not Exposed | COMMON ACTIVITIES, POLLUTANT SOURCES, AND ASSOCIATED POLLUTANTS | | |
|-------------------------------------|-------------------------------------|---|---|---|
| | | Activity | Pollutant Source | Pollutant |
| N/A | N/A | Material processing: Material handling systems (forklifts, cranes, and conveyors) | Damaged or worn bearing housings. | Grease and other lubricants, accumulated particulate matter. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Material processing: Stationary scrap processing facilities (balers) | Leaks from hydraulic reservoirs, hose and fitting connections, worn gaskets, spills or leaks from fuel tanks, particulates/residue from scrap processing, malfunctioning pumps and motors (e.g., leaking gaskets, seals or pipe connections, leaking oil-filled transformer casings). | Heavy metals (e.g., zinc, copper, lead, cadmium, chromium) and hydraulic fluids, PCBs. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Material processing: Hydraulic equipment and systems, balers, shearers, compactors, engine block/cast iron breaker, wire chopper, turnings crusher | Particulate/residue from material processing, spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections/fittings, leaking gaskets. | Hydraulic fluids/oils, lubricants, particulate matter from combustion engines, PCBs (oil-filled electrical equipment components), heavy metals (nonferrous, ferrous). |
| N/A | N/A | Material processing: Electrical control systems (transformers, electrical switch gear, motor starters) | Oil leakage from transformers, leakage from mercury float switches, faulty detection devices. | PCBs, mercury (float switches), ionizing radioactive material (fire/smoke detection systems). |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Materials processing: Torch cutting | Residual/accumulated particulates. | Heavy metal fragments, fines. |

| Exposed | Not Exposed | COMMON ACTIVITIES, POLLUTANT SOURCES, AND ASSOCIATED POLLUTANTS | | |
|-------------------------------------|-------------------------------------|--|--|--|
| | | Activity | Pollutant Source | Pollutant |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Material handling systems | Spills and/or leaks from fuel tanks, spills/leaks from oil/hydraulic fuel reservoirs, faulty/leaking hose connections/fittings, leaking gaskets. | Accumulated particulate matter (ferrous and nonferrous metals, plastics, rubber, other), oil/lubricants, PCBs (electrical equipment), mercury (electrical controls), lead/battery acids. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Vehicle maintenance | Parts cleaning, waste disposal of rags, oil filters, air filters, batteries, hydraulic fluids, transmission fluids, brake fluids, coolants, lubricants, degreasers, spent solvents. | Gas/diesel fuel, fuel additives, oil/lubricants, heavy metals, brake fluids, transmission fluids, chlorinated solvents, arsenic. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Vehicle fueling | Spills and leaks during fuel transfer, spills due to “topping off” tanks, runoff from fueling areas, washdown of fueling areas, leaking storage tanks, spills of oils, brake fluids, transmission fluids, engine coolants. | Gas/diesel fuel, fuel additives, oil, lubricants, heavy metals. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Vehicle and equipment cleaning and washing | Washing and steam cleaning. | Solvent cleaners, oil/lubricants/additives, antifreeze (ethylene glycol). |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Unknowing acceptance of non-recyclable materials and/or small quantities of household hazardous wastes | Inbound recyclable materials. | Dependant on material. |

| Exposed | Not Exposed | COMMON ACTIVITIES, POLLUTANT SOURCES, AND ASSOCIATED POLLUTANTS | | |
|-------------------------------------|-------------------------------------|---|---|---|
| | | Activity | Pollutant Source | Pollutant |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Outdoor material storage | Deterioration of waste paper and unprocessed aluminum beverage containers. | Biochemical oxygen demand (BOD). |
| N/A | N/A | Processing and storage | Illicit connections or improper dumping to floor drains discharging to a storm sewer system. | Dependant on material. |
| N/A | N/A | | Washing down tipping floor areas. | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Vehicle maintenance | Replacement of fluids such as transmission and brake fluids, antifreeze, oil and other lubricants, washdown of maintenance areas, dumping fluids down floor drains connected to storm sewer system, outside storage of fluids and oily rags and waste material. | Oil and grease, gas/diesel fluid, accumulated particulate matter, antifreeze (ethylene glycol). |

2.3 Spills and Leaks

| AREAS OF SITE WHERE POTENTIAL SPILLS/LEAKS COULD OCCUR | |
|--|--------------------------------|
| Location | Spill Control |
| Fueling Area (on-road vehicles-diesel) | Concrete pad |
| Fueling Area (off-road vehicles-diesel) | Concrete pad / asphalt lot |
| Fueling Area (kerosene heaters) | Not exposed-interior operation |
| Other | |

| HISTORY OF SPILLS AND LEAKS | | | |
|------------------------------------|---------------------|--------------------------|------------------------------|
| Spill Date | What Spilled | Where / What Area | How Was it Cleaned Up |
| None | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

2.4 Non-Stormwater Discharges Documentation

Please see the attached Non-Stormwater Discharge Certification in Appendix C.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

Refueling of on-road vehicles takes place on concrete surfaces adjacent to existing above-ground storage tanks (ASTs) using Best Management Practices (BMPs). Only the dispensers are exposed. Off-road vehicles are refueled on an asphalt surface adjacent to the dispensing AST using BMPs.

3.2 Spill Prevention and Response

A Spill Prevention, Control and Countermeasure (SPCC) plan was prepared by Nobis Group, dated April 30, 2018, for the facility per the requirements by the New Hampshire Department of Environmental Services (NHDES) AST Rules Env-Or 300 and the Environmental Protection Agency (EPA) Regulations, 40 CFR 112. Refer to a copy of the SPCC plan included in Appendix D.

3.3 Core Best Management Practices (BMPs)

The following tables present the “Core” BMPs for good housekeeping and maintenance that are part of the SPCC plan for this site. The SPCC plan is included in Appendix D. Refer to Appendix A, Sectors M, N, and L for additional detail.

| ACTIVITY | BMPs | | STATUS | |
|--|--|---|---------|--|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Inbound Recyclable and Waste Material Control | Properly identify small volume of inbound auto and truck related parts (motor blocks, transmissions, and radiators). If materials are received that exceed the acceptable limit of oil, grease or fluids, reject the material, or if already accepted, contact the customer to explain what is acceptable and what is not. | 1 | Ongoing | |
| | Maintain a written list of materials that will not be accepted at the facility and materials that will be accepted, but require special handling procedures. | 2 | Ongoing | |
| | Conduct employee training on the inspection and acceptance of inbound recyclable materials. Employees will utilize the facility map to assist in directing materials to the appropriate loading and storage area. | 3 | Ongoing | |
| | Inspect all materials coming into the yard. Employees must sign customer's delivery slip to signify that materials have been inspected. Customers will not be paid unless they show proof that their load has been inspected. | 4 | Ongoing | |
| | Materials that may have fluids (industrial turnings, automotive parts), will be stored under cover and on impervious surfaces. Turnings will be stored in the containment area. Any free liquid will drain to the oil/water separator. | 5 | Ongoing | |
| | Inspect all vehicles arriving at the site for leaks. | 6 | Ongoing | |
| | Drain all fluids from vehicles upon arrival at the site. Segregate the fluids and properly store or dispose of them. Drain fluids only in designated area over impervious surfaces or drip pans. Contain the area to prevent stormwater run-on and runoff. Cover area with roofs or tarps. | 7 | Ongoing | |
| | Separate waste streams. Keep parts cleaner separate from used oil. | 8 | Ongoing | |
| | Store waste oil in 275 gallon plastic totes. Temporarily store totes behind secondary containment. | 9 | Ongoing | |

| ACTIVITY | BMPs | | STATUS | |
|--|--|----|---------|-----|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Inbound Recyclable and Waste Material Control (cont.) | Recycle antifreeze, gasoline, used oil, mineral spirits, and solvents. | 10 | Ongoing | |
| | Send greasy rags off-site to be laundered. Drain and recycled oil filters. Recycle batteries. | 11 | Ongoing | |
| | Ship used oil using a manifest. Ship batteries using a bill of lading. | 12 | Ongoing | |
| | Keep cracked batteries in open head plastic 55 gallon. | 13 | Ongoing | |
| | Drain all drip pans after use. | 14 | Ongoing | |
| | Do not pour liquids down sanitary drains or storm drains. | 15 | Ongoing | |
| | Plug all floor drains. | 16 | | N/A |
| | Inspect maintenance areas monthly and document with a safety inspection form. | 17 | Ongoing | |
| | Install stormwater discharge controls to address any pollutants detected during sampling events. | 18 | Ongoing | |
| | Conduct refresher training for employees on proper waste control and disposal procedures associated with stormwater pollution prevention. | 19 | Ongoing | |
| | Establish and implement procedures to educate auto scrap providers of the need to remove mercury switches from hood and trunk lighting units and anti-lock brake system units. | 20 | Ongoing | |
| Outside Scrap Material Storage: (liquids) | Use drip pans under all vehicles and equipment waiting for processing. | 21 | Ongoing | |
| | Store batteries inside trailers to avoid contact with stormwater. | 22 | Ongoing | |
| | Confine storage to the designated areas in accordance with the facility map. | 23 | Ongoing | |
| | Store potential sources for residual fluids in covered sealed containers. Remove when the container is full. | 24 | Ongoing | |
| | Maintain diversion ditches to direct water away from working areas of the facility. Additional diversion and control features should be designed/constructed if sampling results indicate that additional measures are needed. | 25 | Ongoing | |

| ACTIVITY | BMPs | | STATUS | |
|--|--|----|---------|-----------|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Outside Scrap Material Storage: (liquids) (cont.) | Keep dry absorbents on-hand for spills. Store potential sources of residual fluids in covered sealed containers. Ship full containers off site. | 26 | Ongoing | |
| | Perform a yard inspection daily and document the activity on a weekly basis. | 27 | Ongoing | |
| | Train employees on the storage and processing of recyclable materials. Instruct employees to utilize a facility map to maintain materials in the appropriate loading and storage area. | 28 | Ongoing | |
| Scrap Material Storage: (bulk solid materials) | Maintain diversion ditches to direct water away from working areas of the facility. Additional diversion and control features should be designed/constructed if sampling results indicate that additional measures are needed. | 29 | Ongoing | |
| | Keep dry absorbents on-hand for spills. Store potential sources of residual fluids in covered sealed containers. Ship full containers off site. | 30 | Ongoing | |
| | Locate spill pans under stored vehicles. | 31 | Ongoing | |
| | Design and install stormwater controls using filter media if sampling results indicate that additional measures are needed. | 32 | | Fall 2021 |
| | Store vehicle transmissions and engines with potential for residual fluids in covered sealed containers. | 33 | Ongoing | |
| | Provide steel IPCs (in plant containers) for customers to use for recycling program. | 34 | Ongoing | |
| | Monitor uncovered storage areas for risk of pollution and adjust accordingly. Install berms around items with temporary covers so that stormwater is directed away from stockpiles. | 35 | Ongoing | |
| | Perform a daily yard inspection and document results on a weekly basis. | 36 | Ongoing | |
| | Document on-job-training of operators/employees to address maintenance and protection of stormwater controls/pollution prevention measure. | 37 | Ongoing | |

| ACTIVITY | BMPs | | STATUS | |
|--|---|----|---------|-------------|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Other Storage: (lightweight materials) | Perform inspection of sealed containers during daily inspection of the yard. Include documentation in weekly report. | 38 | Ongoing | |
| | Maintain containment and oil/water separator in metal turnings storage area. | 39 | Ongoing | |
| | Perform weekly inspection of all ASTs and provide monthly documentation. | 40 | Ongoing | |
| | Monitor uncovered storage areas for risk of pollution and adjust accordingly. Install berms for materials with temporary covers so that stormwater is directed away from stockpiles. | 41 | Ongoing | |
| | Inspect AST piping during daily yard walks. Document weekly. | 42 | Ongoing | |
| | Conduct training for employees on proper fuel filling and transfer procedures. | 43 | Ongoing | |
| Automobile Processing Operations | Use drip pans under all vehicles and equipment waiting for processing. | 44 | Ongoing | |
| | Drain all fluids from vehicles upon arrival at the site. Segregate the fluids and properly store or dispose of them. Drain fluids only in designated areas over impervious surfaces or drip pans. Contain the area to prevent stormwater run-on and runoff. Cover area with roofs or tarps. | 45 | Ongoing | |
| | Recycle antifreeze, gasoline, used oil, mineral spirits, and solvents. | 46 | Ongoing | |
| | Keep dry absorbents on-hand for spills. Store potential sources of residual fluids in covered sealed containers. Ship full containers off site. | 47 | Ongoing | |
| | Train employees on proper handling (collection, storage, and disposal) of oil, used mineral spirits, antifreeze, mercury switches, and solvents. | 48 | Ongoing | |
| | Inspect quarterly for signs of leakage from all equipment containing oily parts, hydraulic fluids, any other types of fluids, or mercury switches. | 49 | | Summer 2021 |

| ACTIVITY | BMPs | | STATUS | |
|--|---|---------|---------|-------------------------------------|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Automobile Processing Operations (cont.) | Inspect quarterly for signs of leakage from all vessels and areas where hazardous materials and general automotive fluids are stored, including but not limited to mercury switches, brake fluid, transmission fluid, radiator water, and antifreeze. | 50 | | Summer 2021 |
| Scrap Processing Operations | Provide containment bins or equivalent for shredded material, especially lightweight materials such as fluff (preferably at the discharge of these materials from the air classification system). | 51 | | N/A |
| | Keep absorbent materials on hand, adjacent to the electric baler located outside Building #2. | 52 | Ongoing | |
| | Construct containment for hydraulic fluid for outside baler. | 53 | | N/A |
| | Stabilize high traffic areas that are not currently concrete or asphalt surfaces. | 54 | Ongoing | |
| | Provide alarm, pump shutoff, or sufficient containment for hydraulic reservoir (for baler outside Building #2) in the event of a line break. | 55 | | New Baler to be Installed Fall 2021 |
| | Maintain high level alarms and overflow protection for ASTs. | 56 | Ongoing | |
| | Conduct frequent cleaning of accumulated fluids and particulate residue around all scrap processing equipment. | 57 | Ongoing | |
| | Conduct daily inspections of equipment for spills or leakage of fluids, oil, fuel, and/or hydraulic fluids due to malfunctioning, worn, or corroded parts or equipment. Document on a weekly basis. | 58 | Ongoing | |
| | Conduct routine preventive maintenance of equipment per original manufacturer's equipment (OME) recommendations. Replace worn or malfunctioning parts. | 59 | Ongoing | |
| Conduct routine maintenance on the oil/water separator/evaporator. Document accordingly. | 60 | Ongoing | | |

| ACTIVITY | BMPs | | STATUS | |
|--|--|----|---------|-----|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Scrap Processing Operations (cont.) | Design and construct retention/detention ponds or basins, sediment traps, vegetated swales or strips for pollutant settling/filtration if sampling results in the detection of pollutants. | 61 | Ongoing | |
| | Conduct spill prevention and response procedures in accordance with SPCC. | 62 | Ongoing | |
| | Provide training to equipment operators on how to minimize exposure of runoff to scrap processing areas. | 63 | Ongoing | |
| Scrap Lead Acid Battery Program | Store batteries in box trailers, under cover. | 64 | Ongoing | |
| | Separate all scrap batteries from incoming material and store in trailers. | 65 | Ongoing | |
| | Inspect incoming materials for cracked or leaking batteries. Immediately transfer to sealed container. | 66 | Ongoing | |
| | Containerize batteries that are damaged during handling and storage in a plastic open head 55 gallon drums. | 67 | Ongoing | |
| Supplies for Process Equipment | Locate storage drums containing liquids, including oils and lubricants indoors. Alternatively, site palletized drums and containers on an impervious surface and provide sufficient containment around the materials. Provide sumps and/or oil/water separators, if necessary. | 68 | Ongoing | |
| | Conduct daily inspection of containment areas and containers/drums for corrosion. Document weekly. | 69 | Ongoing | |
| | Perform and document preventive maintenance of BMPs. | 70 | Ongoing | |
| | Train employees on proper material handling and storage procedures and document accordingly. | 71 | Ongoing | |
| Vehicle and Equipment Maintenance | Plug floor drains that are connected to the storm or sanitary sewer; if necessary, install a sump that is pumped regularly. | 72 | | N/A |
| | Maintain an organized inventory of materials used in the maintenance shop. | 73 | Ongoing | |

| ACTIVITY | BMPs | | STATUS | |
|--|---|---------|---------|--|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Vehicle and Equipment Maintenance (cont.) | Use drip pans, drain boards, and drying racks to direct drips back into a sink or fluid holding tank for re-use. | 74 | Ongoing | |
| | Drain all parts of fluids prior to disposal. Oil filters can be crushed and recycled. | 75 | Ongoing | |
| | Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers. Document as part of the monthly Safety Inspection. | 76 | Ongoing | |
| | Launder greasy rags off site. Recycle oil filters, air filters, batteries, spent coolant, and degreasers properly. | 77 | Ongoing | |
| | Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries). | 78 | Ongoing | |
| | Maintain an organized inventory of materials. | 79 | Ongoing | |
| | Eliminate or reduce the number or amount of hazardous materials and waste by substituting nonhazardous or less hazardous materials. | 80 | Ongoing | |
| | Clean up leaks, drips, and other spills without using large amounts of water. Use dry absorbent products when practical. | 81 | Ongoing | |
| | Prohibit the practice of hosing down an area where the practice would result in the exposure of pollutants to stormwater. | 82 | Ongoing | |
| | Clean without using liquid cleaners whenever possible. | 83 | Ongoing | |
| | Do all cleaning at a centralized station so the solvents stay in one area. | 84 | Ongoing | |
| | If parts are dipped in liquid, remove them slowly to avoid spills. | 85 | Ongoing | |
| Do not pour liquid waste down sinks, outdoor storm drain inlets, other storm drains, or sewer connections. | 86 | Ongoing | | |

| ACTIVITY | BMPs | | STATUS | |
|--|---|----|---------|--|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Vehicle and Equipment Maintenance (cont.) | Perform all cleaning operations indoors or within containment area. Utilize off-site vehicle car/truck wash when possible. | 87 | Ongoing | |
| | If vehicle maintenance is uncovered because equipment is too large to park indoors, perform on temporary tarp and keep drip pans and spill kit close by. | 88 | Ongoing | |
| | Park vehicles and equipment indoors or under a roof whenever possible where proper control of oil leaks/spills is maintained and exposure to stormwater is prevented. | 89 | Ongoing | |
| | Inspect vehicles daily for leaks and use pans to collect fluid when leaks occur. Document weekly. | 90 | Ongoing | |
| | DO NOT discharge washwater to a storm drain or surface water. | 91 | Ongoing | |
| | Use covers to minimize stormwater exposure to roll-off containers when practical. | 92 | Ongoing | |
| | Use berms, curbs, or similar means to ensure that stormwater runoff from other parts of the facility does not flow over the vehicle and equipment maintenance areas. | 93 | Ongoing | |
| | Inspect the maintenance area daily for proper implementation of control measures. Document weekly. | 94 | Ongoing | |
| | Train employees on proper waste control and disposal procedures. | 95 | Ongoing | |
| Vehicle Fueling | Conduct fueling operations (including the transfer of fuel from tank trucks) on an impervious or contained pad or under a roof or canopy where possible. Covering should extend beyond spill containment pad to prevent rain from entering. | 96 | Ongoing | |
| | When fueling in uncovered area, inspect frequently and clean up minor spills immediately. | 97 | Ongoing | |
| | Use drip pans where leaks or spills of fuel can occur and where making and breaking hose connections. | 98 | Ongoing | |

| ACTIVITY | BMPs | | STATUS | |
|--|--|-----|---------|-----|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Vehicle Fueling (cont.) | Use fueling hoses with check valves to prevent hose drainage after filling. | 99 | Ongoing | |
| | Use spill and overflow protection devices. | 100 | Ongoing | |
| | Clean up spills and leaks immediately. | 101 | Ongoing | |
| | Minimize/eliminate run-on onto fueling areas with diversion dikes, berms, curbing, surface grading or other equivalent measures. | 102 | Ongoing | |
| | Collect stormwater runoff and provide treatment or recycling. | 103 | | N/A |
| | Use spill and overflow protection devices. | 104 | Ongoing | |
| | Use dry cleanup methods for fuel area rather than hosing the fuel area down. | 105 | Ongoing | |
| | Perform preventive maintenance on storage tanks to detect potential leaks before they occur. | 106 | Ongoing | |
| | Inspect the fueling area to detect problems before they occur. | 107 | Ongoing | |
| | Train personnel on proper fueling procedures and document. | 108 | Ongoing | |
| | Provide curbing or posts around fuel pumps to prevent collisions during vehicle ingress and egress. | 109 | Ongoing | |
| | Discourage “topping off” of fuel tanks. | 110 | Ongoing | |
| Outdoor vehicle parking and storage | Store vehicles and equipment under cover where practical. | 111 | Ongoing | |
| | Use drip pans under all equipment and vehicles waiting maintenance. | 112 | Ongoing | |
| | Conduct daily inspections of storage and parking areas for leaks and filled drip pans. Document weekly. | 113 | Ongoing | |
| | Provide employee training and document. | 114 | Ongoing | |
| Vehicle and Equipment Washing | Designate an area for cleaning activities. | 115 | Ongoing | |
| | Use detergent or water-based cleaning systems in place of organic solvent degreasers. | 116 | Ongoing | |

| ACTIVITY | BMPs | | STATUS | |
|--|---|-----|---------|-----|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| | Use phosphate-free biodegradable detergents. | 117 | Ongoing | |
| Vehicle and Equipment Washing (cont.) | Wash parts or equipment in designated area. | 118 | Ongoing | |
| | Install curbing, berms, or dikes around cleaning areas. | 119 | Ongoing | |
| | Inspect cleaning area daily and document weekly. | 120 | Ongoing | |
| | Train employees on proper washing procedures. | 121 | Ongoing | |
| | Contain steam cleaning washwaters. Discharge to sanitary sewer in compliance with POTW pre-treatment standards, dispose via licensed waste hauler, or discharge under an applicable NPDES permit. | 122 | Ongoing | |
| Vehicle and Equipment Painting (where applicable) | Conduct sanding and painting in non exposed areas (e.g., under cover) in accordance with OSHA standards. | 123 | | N/A |
| | Minimize over spraying. | 124 | | N/A |
| | Clean up accumulated particulate matter. | 125 | | N/A |
| | Dispose or recycle paint, solvents, and thinner properly. | 126 | | N/A |
| | Keep paint and solvents away from traffic areas. | 127 | | N/A |
| | Conduct periodic inspections of paint spraying areas. | 128 | | N/A |
| | Provide training on control procedures for employees. | 129 | | N/A |
| | Conduct sanding and painting in non exposed areas (e.g., under cover) in accordance with OSHA standards. | 130 | | N/A |

| ACTIVITY | BMPs | | STATUS | |
|--|--|-----|---------|--|
| Automobile Salvage Yards; Scrap and Waste Recycling Facilities (non-source separated, nonliquid recyclable materials) | | | | |
| Erosion and Sediment Control | Minimize run-on from adjacent properties using diversion dikes, berms, or equivalent. | 131 | Ongoing | |
| | Trap sediment at down gradient locations and outlets serving unstabilized areas. This may include filter fabric fences, gravel outlet protection, sediment traps, vegetated or riprap swales, vegetated strips, diversion structures, catch-basin filters, and retention/detention basins or equivalent. | 132 | Ongoing | |
| | Stabilize all high traffic areas, including all vehicle entrances and exit points. Conduct periodic sweeping of all traffic areas. Conduct inspections of BMPs. | 133 | Ongoing | |
| | Perform preventative maintenance as needed on BMPs. | 134 | Ongoing | |
| | Provide employee training on the proper installation and maintenance of erosion and sediment controls. | 135 | Ongoing | |

3.4 Erosion and Sediment Controls

Below is a list of erosion control measures that should be employed at Harding Metals to prevent erosion and contain sediment on the property. Results of continued monitoring may require design and installation of additional controls on an ongoing basis. This should be monitored and documented in accordance with Section 5.

- Any bare soils or unvegetated areas (in inactive areas) found during routine inspections are seeded and mulched within 72 hours (in the growing seasons);
- Sloped areas are stabilized with an erosion control grass seed mix consisting of deep-rooted perennials and grasses.
- Active work areas are surface treated with gravel/stone or pavement/concrete.

- Swales are lined with either riprap or vegetation and contain check dams along long runs and sediment traps prior to discharge locations.
- A stone pad is maintained at locations where gravel/soil transitions to pavement/concrete to control tracking of sediment off site.

3.5 Management of Runoff

The following management practices for runoff will be used at this facility (Refer to Figure 2). Results of continued monitoring may require design and installation of additional controls on an ongoing basis. This should be monitored and documented in accordance with Section 5.

- Runoff from paved and gravel surfaces sheet flows or is channeled to swales or allowed to disperse in buffer areas;
- Runoff from metal storage areas sheet flows/or is channeled to swales or is allowed to disperse in buffer areas.

3.6 Employee Training

Harding Metals will provide formal initial Stormwater Pollution Prevention training for all new employees, within 30 days of hire and annual refresher training for all employees who are responsible for implementing activities identified in this plan (i.e., the members of the Pollution Prevention Team) and all employees that work in areas where leaks or spills of petroleum products are possible. Topics to be covered during the training include but are not necessarily limited to the following:

- The purpose and requirements of the Stormwater Pollution Prevention Plan
- Spill prevention, response, and reporting procedures (Refer to SPCC)
- Specific and appropriate control measures used to achieve the effluent limits
- Monitoring, inspection, planning, reporting, and documentation requirements
- Good housekeeping practices and material management practices
- Current and proposed best management practices
- Other: _____

Note: All Stormwater Pollution Prevention training for employees shall be documented and attached to this SWPPP. Records shall include at least the following: Name and qualifications of the trainer, signatures of all employees in attendance, duration of training, and topics covered.

3.7 Non-Stormwater Discharges

There are no known non-stormwater discharges at this site. Refer to the “Non-stormwater Discharge Certification” found in Appendix C.

3.8 Waste, Garbage, and Floatable Debris

Waste, Garbage, and Floatable Debris is managed and contained on site by the staff. Continue biannual patrols of the perimeter of the working area to pick up any stray litter. Continue usage of covered dumpsters to prevent windblown litter.

3.9 Dust Generation and Vehicle Tracking of Industrial Materials

The generation of dust and off-site tracking of raw, final, or waste materials is kept to a minimum by the use of dedicated vehicles, which operate at slow speeds, and operate primarily on designated paved surfaces. On-site traffic that must travel on gravel surfaces shall be treated with stone tracking control pads. In addition, calcium chloride may be applied to active gravel surfaces.

3.10 Stormwater Control Measure Enhancements for Major Storm Events

The Harding Metals facility is located in an area designated as Zone X, determined to be outside the 0.2% annual chance floodplain on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 33015C0085E, effective May 17, 2005. As such, flood conditions at the facility are unlikely. In the event of a major storm, the facility shall consider implementation of the following stormwater control measure enhancements:

- Install additional stone check dams, hay bales, and/or straw wattles as necessary to dissipate flow and protect discharge areas.
- Store materials as appropriate to minimize contact with stormwater.
- Temporarily reduce outdoor storage if feasible.

- ☑ Temporarily relocate mobile vehicles and equipment to higher ground.

- ☑ If large deliveries of exposed materials are expected, and a significant storm is anticipated within 48 hours, delay delivery until after the storm or store materials as appropriate.

SECTION 4: SCHEDULES AND PROCEDURES FOR STORMWATER SAMPLING

4.1 Indicator Monitoring

1. **Sample Location(s).** Samples will be collected at the on-site stormwater outfalls SWPPP-1 through SWPPP-5. The stormwater outfalls on-site consist of swales located along the south, east, and west edges of the site (refer to Figure 2 for locations). Due to additional paved and concrete areas and swales installed in recent years, the discharge locations from the facility have changed. As a result, sampling locations SWPPP-3 and SWPPP-4 have been relocated to the appropriate discharge locations. The former SWPPP-2 sampling location no longer receives stormwater runoff from the facility and has been eliminated.

2. **Pollutant Parameters to be Sampled.** Stormwater will be sampled and laboratory tested for Indicator parameters, if applicable. The following table presents the Indicator parameters applicable to this facility. The facility does not currently have asphalt surfaces that have been treated with a coal-tar sealant. Therefore, the facility is not currently required to sample for polycyclic aromatic hydrocarbons (PAHs). The facility will become subject to this sampling if a coal-tar sealant is applied in the future. See Appendix F for Stormwater Discharge Sampling Forms.

| SECTOR/SUBSECTOR | INDICATOR MONITORING PARAMETER | INDICATOR MONITORING THRESHOLD |
|--|--|--|
| Subsector L / M1 / N1. Landfills / Automobile Salvage Yards / Scrap Recycling and Waste Recycling Facilities (Non-Source Separated, Nonliquid Recyclable Materials) with Stormwater Discharges from Paved Surfaces Initially Sealed or Re-Sealed with Coal-tar Sealcoat where Industrial Activities are Located. | Polycyclic Aromatic Hydrocarbons (PAHs) ¹ | Report Only / No Thresholds or Baseline Values |
| Subsector L2. All Landfill, Land Application Sites and Open Dumps, except Municipal Solid Waste Landfill (MSWLF) Areas Closed in Accordance with 40 CFR 258.60 (Activity Code LF). | Chemical Oxygen Demand (COD) | Report Only / No Thresholds or Baseline Values |
| | Total Suspended Solids (TSS) | Report Only / No Thresholds or Baseline Values |
| | pH | Report Only / No Thresholds or Baseline Values |

¹Monitoring is required for the 16 individual PAHs identified at Appendix A to 40 CFR Part 423: naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, indeno[1,2,3-c,d]pyrene, and dibenz[a,h]anthracene.

3. **Monitoring Schedule.** Stormwater sampling for PAHs will be collected bi-annually (twice per year) in the first and fourth year of permit coverage (if applicable). Sampling for other Indicator parameters will be conducted quarterly throughout the entirety of permit coverage.

4.2 Quarterly Benchmark Monitoring

1. **Sample Location(s).** Samples will be collected at the on-site stormwater outfalls SWPPP-1 through SWPPP-5. The stormwater outfalls on-site consist of swales located along the south, east, and west edges of the site (refer to Figure 2 for locations).

2. Pollutant Parameters to be Sampled. Stormwater will be sampled and laboratory tested for Benchmark parameters. The following table presents the Benchmark concentration/limitation for this facility. See Appendix F for Stormwater Discharge Sampling Forms.

| SECTOR/SUBSECTOR | BENCHMARK MONITORING PARAMETER | BENCHMARK MONITORING THRESHOLD |
|--|---------------------------------------|---------------------------------------|
| Subsector L1 / M1 / N1. All Landfill, Land Application Sites, and Open Dumps (Industrial Activity Code "LF") / Automobile Salvage Yards (SIC 5015) / Scrap Recycling and Waste Recycling Facilities except Source-Separated Recycling (SIC 5093) | Total Suspended Solids (TSS) | 100 mg/L |
| Subsector M1 / N1. Automobile Salvage Yards (SIC 5015) / Scrap Recycling and Waste Recycling Facilities except Source-Separated Recycling (SIC 5093) | Total Recoverable Aluminum | 1.1 mg/L |
| | Total Recoverable Lead ¹ | Hardness Dependent |
| Subsector N1. Scrap Recycling and Waste Recycling Facilities except Source-Separated Recycling (SIC 5093) | Chemical Oxygen Demand (COD) | 120 mg/L |
| | Total Recoverable Copper | 0.00519 mg/L |
| | Total Recoverable Zinc ¹ | Hardness Dependent |

¹The benchmark values of some metals are dependent on water hardness. For these parameters, permittees must determine the hardness of the receiving water (see the 2021 Multi-Sector General Permit (MSGP) for Industrial Activities, Appendix J, “Calculating Hardness in Receiving Waters for Hardness Dependent Metals,” for methodology), in accordance with Part 4.2.2.1, to identify the applicable ‘hardness range’ for determining their benchmark value applicable to their facility. The ranges occur in 25 mg/L increments. Hardness Dependent Benchmarks follow in the table below:

| WATER HARDNESS RANGE | LEAD (mg/L) | ZINC (mg/L) |
|-----------------------------|--------------------|--------------------|
| 0-24.99 mg/L | 0.014 | 0.037 |
| 25-49.99 mg/L | 0.024 | 0.052 |
| 50-74.99 mg/L | 0.045 | 0.080 |
| 75-99.99 mg/L | 0.069 | 0.107 |
| 100-124.99 mg/L | 0.095 | 0.132 |
| 125-149.99 mg/L | 0.123 | 0.157 |
| 150-174.99 mg/L | 0.152 | 0.181 |
| 175-199.99 mg/L | 0.182 | 0.204 |
| 200-224.99 mg/L | 0.213 | 0.227 |
| 225-249.99 mg/L | 0.246 | 0.249 |
| 250+ mg/L | 0.262 | 0.260 |

3. Monitoring Schedules. Benchmark monitoring is required quarterly during the first and fourth years of permit coverage. If the annual average value for a parameter does not exceed the threshold in the first year, sampling of that parameter may be discontinued until the fourth year of permit coverage. Quarterly monitoring will be conducted in each of the following 3-month intervals, beginning in the first full quarter of permit coverage:

- January 1 – March 31
- April 1 – June 30
- July 1 – September 30
- October 1 – December 31

If the annual average value for a parameter exceeds the benchmark threshold, Additional Implementation Measures (AIM) outlined in Section 8.2 must be followed and sampling will continue until results indicate the annual average is no longer exceeded.

- 4. Sample Collection Procedures.** A minimum of one grab sample from the outfall location will be collected within the first 30 minutes of a measurable storm event in each quarter. Stormwater sampling and documentation will be performed in a manner consistent with the procedures described in Part 4 and Appendix B, Subsections 10 – 12, of the 2021 MSGP. A copy of the 2021 MSGP can be found in Appendix A.

If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample will be collected as soon as practicable after the first 30 minutes and documentation will be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes. In the case of snowmelt, samples will be taken during a period with a measurable discharge.

Temporary portable (plywood) weirs will be used to facilitate obtaining representative grab samples. Once a sampling program is firmly established, permanent weirs may be put in place, based on evidence that the locations are representative and provide suitable data for the intended purposes.

4.3 Effluent Limitations Monitoring

- 1. Sample Location(s).** Samples will be collected at the on-site stormwater outfalls. The stormwater outfalls on-site consist of swales located along the south, east, and west edges of the site. Refer to Figure 2 for locations.
- 2. Parameters to be Monitored.** Due to the presence of non-hazardous waste landfills on the site, stormwater will be sampled and laboratory tested for compliance with effluent limitations outlined in the following table. See Appendix F for Stormwater Discharge Sampling Forms.

| INDUSTRIAL ACTIVITY | PARAMETER | EFFLUENT LIMIT |
|--|--|-------------------------------|
| Discharges from non-hazardous waste landfills subject to effluent limitations in 40 CFR part 445 Subpart B | Biochemical Oxygen Demand (BOD ₅) | 140 mg/L, daily maximum |
| | | 37 mg/L, monthly avg. max. |
| | Total Suspended Solids (TSS) | 88 mg/L, daily maximum |
| | | 27 mg/L, monthly avg. max. |
| | Ammonia | 10 mg/L, daily maximum |
| | | 4.9 mg/L, monthly avg. max. |
| | Alpha Terpineol | 0.033 mg/L, daily maximum |
| | | 0.016 mg/L, monthly avg. max. |
| | Benzoic Acid | 0.12 mg/L, daily maximum |
| | | 0.071 mg/L, monthly avg. max. |
| | p-Cresol | 0.025 mg/L, daily maximum |
| | | 0.014 mg/L, monthly avg. max. |
| | Phenol | 0.026 mg/L, daily maximum |
| | | 0.015 mg/L, monthly avg. max. |
| Total Zinc | 0.20 mg/L, daily maximum | |
| | 0.11 mg/L, monthly avg. max. | |
| pH | Within the range of 6-9 standard pH units (s.u.) | |

3. **Monitoring Schedules.** Monitoring is required once per year in conjunction with the first full quarter of permit coverage (July 1 – September 30).

4. **Sample Collection Procedures.** A minimum of one grab sample from the outfall location will be collected within the first 30 minutes of a measurable storm event in each quarter. Stormwater sampling and documentation will be performed in a manner consistent with the procedures described in Part 4 and Appendix B, Subsections 10 – 12, of the 2021 MSGP. A copy of the 2021 MSGP can be found in Appendix A.

If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample will be collected as soon as practicable after the first 30 minutes and documentation will be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes. In the case of snowmelt, samples will be taken during a period with a measurable discharge.

4.4 Monitoring Discharges to an Impaired Water

All surface waters in the state of New Hampshire are considered impaired for mercury. Pursuant to Section 4.2.5.1 of the MSGP, monitoring for mercury is not presently required because EPA has approved a TMDL for mercury.

SECTION 5: INSPECTIONS

5.1 Routine Facility Inspections

Routine facility inspections will be conducted on a quarterly basis, and upon any incident of a staff member finding deficiencies in equipment maintenance or leakage from any vessel containing fluids that could potentially contaminate stormwater. Routine facility inspection report will be incorporated into this SWPPP in Appendix G.

- Trained personnel will regularly inspect the fueling area for signs of spills or leaks and proper labeling. Hoses and fittings will also be regularly inspected.
- Trained personnel will inspect above ground storage tanks for signs of corrosion or leaks.
- Trained personnel will inspect and insure that all materials, waste storage areas, drains, tanks and cans are properly labeled.

5.2 Quarterly Stormwater Discharge Monitoring (Visual Assessment)

Four times per year, trained personnel will visually examine the stormwater discharges at the outfall locations (see Figure 2). Visual examinations will be made during daylight hours and within 30 minutes after stormwater begins to runoff from the site. Trained personnel will document any observed stormwater contamination or site run-off problems. Reports will include date and time of inspection, a determination of the source of contamination (if any) and corrective actions taken to eliminate the cause(s), if necessary. Quarterly Stormwater Discharge Monitoring Reports will be incorporated into this SWPPP in Appendix H.

5.3 Annual Report

You must submit an Annual Report to EPA electronically by January 30th for each year of permit coverage containing information generated from the past calendar year. You must include the following information:

- A summary of your past year's routine facility inspection documentation required (Part 3.1.6);
- A summary of your past year's quarterly visual assessment documentation (see Part 3.2.3 of the permit);
- A summary of your past year's corrective action and any required AIM documentation (see Part 5.3 of the permit). If you have not completed required corrective action or AIM responses at the time you submit your annual report, you must describe the status of any outstanding corrective action(s) or AIM responses. Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.
- Your Annual Report must also include a statement, signed and certified in accordance with Appendix B, Subsection 11.

SECTION 6: ELECTRONIC REPORTING

As specified in Part 7.1 of the MSGP, all NOI's, NOT's, NEC's, Annual Reports, Discharge Monitoring Reports (DMRs), and other reporting information must be submitted electronically to the EPA. Most information required to be submitted for this SWPPP shall be submitted via EPA's electronic NPDES eReporting tool (NeT), unless the permit states otherwise or unless a waiver has been granted per Part 7.1 of the MSGP. NeT allows users to prepare and submit required information using specific forms, found in the appendices of the MSGP. Net can be accessed at the following link: <https://cdxnodengn.epa.gov/net-msgp/action/login>.

Other information (such as Discharge Monitoring Reports) are required to be submitted using EPA's NetDMR system, which is available at www.epa.gov/netdmr, while some information needs to be submitted directly to an EPA Regional Office at one of the specified addresses in Part 7.8. See Part 7.2-7.6 of the MSGP for requirements on submitting specific documentation to the EPA.

SECTION 7: DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

7.1 Documentation Regarding Endangered Species

As required by Part 1.1.4 of the MSGP this facility must meet one of the seven Criteria (A-E) listed in Appendix E of the MSGP in order to be eligible for coverage under the permit. After reviewing the list of threatened or endangered species identified by the U.S. Fish and Wildlife Service (USFWS), no changes were identified since filing for permit coverage in 2015. A review was also conducted by the New Hampshire Natural Heritage Bureau (NHB), which concluded that no threatened or endangered species were likely to be harmed by the facility. Since the previous SWPPP was prepared for the facility in 2015, a new gravel lot was installed on the northern portion of the property, which is utilized for vehicle parking, storage of empty roll-off containers, and overflow storage of vehicles for salvage that are awaiting processing. The addition of the gravel lot increased the action area from approximately 13.5 acres to 14.8 acres. This increase occurred on the upgradient portion of the site. Much of the stormwater runoff from this area sheet flows into vegetated buffer areas surrounding the lot. Runoff not flowing onto the buffer areas is managed by existing stormwater controls, including swales with stone check dams and hay bales. In accordance with Section E.2 of Appendix E of the MSGP, it has been determined that the facility is eligible for Criterion C2 as defined below:

Criterion C2:

Facility eligible for Criterion C in the 2015 MSGP with CHANGES to listed species, critical habitat, or action area. Your facility was eligible for Criterion C in the 2015 MSGP, but there have been changes in your facility's action area, and/or additional threatened or endangered species and/or designated critical habitat have been listed by USFWS and/or NMFS in your action area since your certification under Criterion C under the 2015 MSGP. You must provide a description of the basis of this criterion selected on your NOI form and provide documentation supporting your eligibility determination in your SWPPP. You must submit your completed Criterion C2 Eligibility information at the same time that you submit your NOI, which will be held for 30 additional days prior to the standard 30-day review for all NOIs.

Basis statement content: A basis statement supporting the selection of this criterion must identify the following:

1. A description of the changes in the facility's action area (if applicable).

2. The USFWS and/or NMFS resources consulted that helped you determine that additional species and/or critical habitat have been listed/designated by either of the Services in your action area.
3. What ESA-listed species and/or designated critical habitat are located in your “action area”.
4. Distance in miles between your site and the ESA-listed species and/or designated critical habitat within the action area (in miles, or state “on site” if the ESA-listed species and/or designated critical habitat is within the area to be disturbed).
5. A description of EPA approved measures you will implement or will continue to implement to ensure no likely adverse effects on ESA-listed species and/or critical habitat.

Completion of the Criterion C Eligibility Form for coverage under the 2015 MSGP determined that although the Northern Long-Eared Bat and the Small Whorled Pogonia were present within Harding Metals’ action area (less than 0.25 miles from the facility), no industrial activities are likely to affect these species or their critical habitat. No additional species were identified by USFWS in Harding Metals’ action area in April 2021. A copy of the completed *Criterion C Eligibility Form* from the 2015 MSGP, an updated USFWS species list, and the NHB review are attached in Appendix J.

7.2 Documentation Regarding Historic Properties

Stormwater discharges and allowable non-stormwater discharges from this facility do not have the potential to have an effect on historic properties. Previous construction on the site has not revealed the presence of historic properties. This satisfies the permit eligibility under Criteria B of the MSGP. Please also refer to correspondence from the NH Department of Historical Resources included in Appendix K.

SECTION 8: CORRECTIVE ACTIONS

Corrective Actions are actions taken to:

- Repair, modify, or replace any stormwater control used at this site
- Clean up and properly dispose of spills, releases, or other deposits
- Remedy a permit violation

Corrective Actions will be taken by the SWPPP Coordinator per direction of the Stormwater Team (See Part 1.4, 1.5).

8.1 Requirements for Taking Corrective Actions

The SWPPP Coordinator must complete the necessary corrective actions in accordance with the specifications in Part 5 of the MSGP. In all circumstances, the Contractor must immediately take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.

Note: In this context, the term “immediately” requires you to, on the same day a condition requiring corrective actions is found, take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action, the initiation of corrective action must begin no later than the following work day.

If additional actions are necessary beyond the immediate actions, you must complete the corrective actions (e.g., install a new or modified control and make it operational, complete the repair) before the next storm event if possible, and within 14 calendar days from the time of discovery of the condition prompting the action. If it is infeasible to complete the corrective action within 14 calendar days, you must document why it is infeasible to complete the corrective action within the 14-day timeframe. You must also identify your schedule for completing the work, which must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. If the completion of corrective action will exceed the 45-day timeframe, you may take the minimum additional time necessary to complete the corrective action, provided that you notify the appropriate EPA Regional Office of your intention to exceed 45 days, your rationale for an extension, and a completion date, which you must also include in your corrective action documentation (see Part 5.3 of the permit). Where your corrective actions result in changes to any of the controls or procedures documented in your SWPPP, you must modify your SWPPP accordingly within 14 calendar days of completing corrective action work.

Additionally, if any of the following conditions occur, you must review your SWPPP (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation

and implementation or your control measures) to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at your facility that significantly changes the nature of pollutants discharged in stormwater from your facility, or significantly increases the quantity of pollutants discharged.

8.2 Additional Implementation Measures (AIM)

If any of the triggering events discussed in the following sections occur, the appropriate response procedures, referred to as “additional implementation measures” or “AIM,” must be followed. There are three levels of AIM which prescribe sequential and increasingly robust responses when a benchmark exceedance occurs. AIM level responses and corresponding deadlines described in Parts 5.2.1, 5.2.2, and 5.2.3 of the permit must be met unless the facility qualifies for an exception under Part 5.2.6 of the permit.

8.2.1 Baseline Status

After receiving discharge authorization under the 2021 MSGP, the facility is in a baseline status for all applicable benchmark parameters. If an AIM triggering event occurs and you have proceeded sequentially to AIM Level 1, 2 or 3, you may return directly to baseline status once the corresponding AIM-level response and conditions are met.

8.2.2 AIM Triggering Events

If an annual average exceeds an applicable benchmark threshold based on the following events, the AIM requirements have been triggered for that benchmark parameter. The facility must follow the corresponding AIM-level responses and deadlines described in Parts 5.2.3, 5.2.4, and 5.2.5 of the permit unless it qualifies for an exception under Part 5.2.6 of the permit. An annual average exceedance for a parameter can occur if:

- The four-quarterly annual average for a parameter exceeds the benchmark threshold; or
- Fewer than four quarterly samples are collected, but a single sample or the sum of any sample results within the sampling year exceeds the benchmark threshold by more than four times for a parameter. This result indicates an exceedance is mathematically certain

(i.e., the sum of quarterly sample results to date is already more than four times the benchmark threshold).

For pH, an annual average exceedance can only occur if the four-quarter annual average exceeds the benchmark threshold .

8.2.3 AIM Level 1

The facility's status changes from baseline to AIM Level 1 if quarterly benchmark monitoring results indicate that an AIM triggering event has occurred, unless the facility qualifies for an exception under Part 5.2.6 of the permit.

If any triggering events occur, you must:

- **Review SWPPP/Stormwater Control Measures.** Immediately review your SWPPP and the selection, design, installation, and implementation of your stormwater control measures to ensure the effectiveness of your existing measures and determine if modifications are necessary to meet the benchmark threshold for the applicable parameter; and
- **Implement Additional Measures.** After reviewing your SWPPP/stormwater control measures, you must implement additional measures, considering good engineering practices, that would reasonably be expected to bring your exceedances below the parameter's benchmark threshold; or if you determine nothing further needs to be done with your stormwater control measures, you must document per Part 5.3 of the permit and include in your annual report why you expect your existing control measures to bring your exceedances below the parameter's benchmark threshold for the next 12-month period.

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

After compliance with AIM Level 1 responses and deadlines, you must continue quarterly

benchmark monitoring for the next four quarters for the parameter(s) that caused the AIM triggering event at all affected stormwater discharge points, beginning no later than the next full quarter after compliance. The facility may return to baseline status if the AIM Level 1 responses have been met and continued quarterly benchmark monitoring results indicate that an AIM Level 2 triggering event has not occurred after four quarters of monitoring (i.e., the benchmark threshold is no longer exceeded for the parameter(s)). Benchmark monitoring for that parameter may be discontinued until monitoring resumes in year 4 of permit coverage, or if all benchmark monitoring requirements have been fulfilled, then you may discontinue monitoring for that parameter for the remainder of the permit.

8.2.4 AIM Level 2

The facility's status changes from AIM Level 1 to AIM Level 2 if the continued quarterly benchmark monitoring results indicate that another AIM triggering event has occurred (i.e., the benchmark threshold continues to be exceeded for the parameter(s)), unless the facility qualifies for an exception under Part 5.2.6 of the permit.

If any AIM Level 2 triggering events occur, you must review your SWPPP and implement additional pollution prevention/good housekeeping BMPs, considering good engineering practices, beyond what was done for AIM Level 1 responses that would reasonably be expected to bring your exceedances below the parameter's benchmark threshold. Refer to the MSGP sector-specific fact sheets for recommended controls found at <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-fact-sheets-and-guidance> .

You must implement additional pollution prevention/good housekeeping BMPs within 14 days of receipt of laboratory results that indicate an AIM triggering event has occurred and document how the measures will achieve benchmark thresholds. If it is feasible for you to implement a measure, but not within 14 days, you may take up to 45 days to implement such measure. You must document why it was infeasible to implement such measure in 14 days. EPA may also grant you an extension beyond 45 days, based on an appropriate demonstration by you, the operator.

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

quarter after compliance. The facility may return to baseline status if the AIM Level 2 responses have been met and continued quarterly benchmark monitoring results indicate that an AIM Level 3 triggering event has not occurred after four quarters of monitoring (i.e., the benchmark threshold is no longer exceeded for the parameter(s)). Benchmark monitoring for that parameter may be discontinued until monitoring resumes in year 4 of permit coverage, or if all benchmark monitoring requirements have been fulfilled, then you may discontinue monitoring for that parameter for the remainder of the permit.

8.2.5 AIM Level 3

The facility's status changes from AIM Level 2 to AIM Level 3 if the continued quarterly benchmark monitoring results indicate that another AIM triggering event has occurred (i.e., the benchmark threshold continues to be exceeded for the parameter(s)), unless the facility qualifies for an exception under Part 5.2.6 of the permit.

If any AIM Level 3 triggering events, you must install structural source controls (e.g., permanent controls such as permanent cover, berms, and secondary containment), and/or treatment controls (e.g., sand filters, hydrodynamic separators, oil-water separators, retention ponds, and infiltration structures), except as provided in Part 5.2.6 of the permit (AIM Exceptions). The controls or treatment technologies or treatment train you install should be appropriate for the pollutants that triggered AIM Level 3 and should be more rigorous than the pollution prevention/good housekeeping-type stormwater control measures implemented under AIM Level 2. You must select controls with pollutant removal efficiencies that are sufficient to bring your exceedances below the benchmark threshold. You must install such stormwater control measures for the discharge point(s) in question and for substantially identical discharge points (SIDPs), unless you individually monitor those SIDPs and demonstrate that AIM Level 3 requirements are not triggered at those discharge points.

You must identify the schedule for installing the appropriate structural source and/or treatment stormwater control measures within 14 days and install such measures within 60 days. If is not feasible within 60 days, you may take up to 90 days to install such measures, documenting in the SWPPP per why it is infeasible to install the measure within 60 days. EPA may also grant you an extension beyond 90 days, based on an appropriate demonstration by you, the operator.

After compliance with AIM Level 3 responses and deadlines, you must continue quarterly benchmark monitoring for the next four quarters for the parameter(s) that caused the AIM triggering event at all affected stormwater discharge points, beginning no later than the next full quarter after compliance. The facility may return to baseline status if the AIM Level 3 responses have been met and continued quarterly benchmark monitoring results indicate that an additional AIM triggering event has not occurred after four quarters of monitoring (i.e., the benchmark threshold is no longer exceeded for the parameter(s)). Benchmark monitoring for that parameter may be discontinued until monitoring resumes in year 4 of permit coverage, or if all benchmark monitoring requirements have been fulfilled, then you may discontinue monitoring for that parameter for the remainder of the permit. If you continue to exceed the benchmark threshold for the same parameter even after compliance with AIM Level 3, EPA may require the facility to apply for an individual permit.

8.3 Corrective Action Report

For each corrective action taken in accordance with MSGP Part 5, the Contractor must complete a Corrective Action Report, which includes the applicable information in MSGP Part 5.3. Note that these reports must be maintained in Harding Metal's records but do not need to be provided to the EPA, except upon request.

Refer to Appendix A MSGP Part 5 for all the requirements/procedures of the corrective actions. Refer to Appendix I for a copy of a Corrective Action Form.

SECTION 9: SWPPP PUBLIC AVAILABILITY

In order to comply with public availability requirements, the Harding Metals SWPPP is posted at the following URL www.hardingmetals.com/HMI-SWPPP.pdf.

The current SWPPP must be maintained at this URL and the URL needs to be provided in the NOI for this facility. The SWPPP update at this URL must be no later than 45 days after conducting the final routine facility inspection for the year required in Part 3.1 of the MSGP. See Section 6.4.1 of the MSGP for further information on SWPPP posting on the internet.

SECTION 10: SWPPP 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.

Name: _____ Title: _____

Signature: _____ Date: _____

SECTION 11: SWPPP MODIFICATIONS

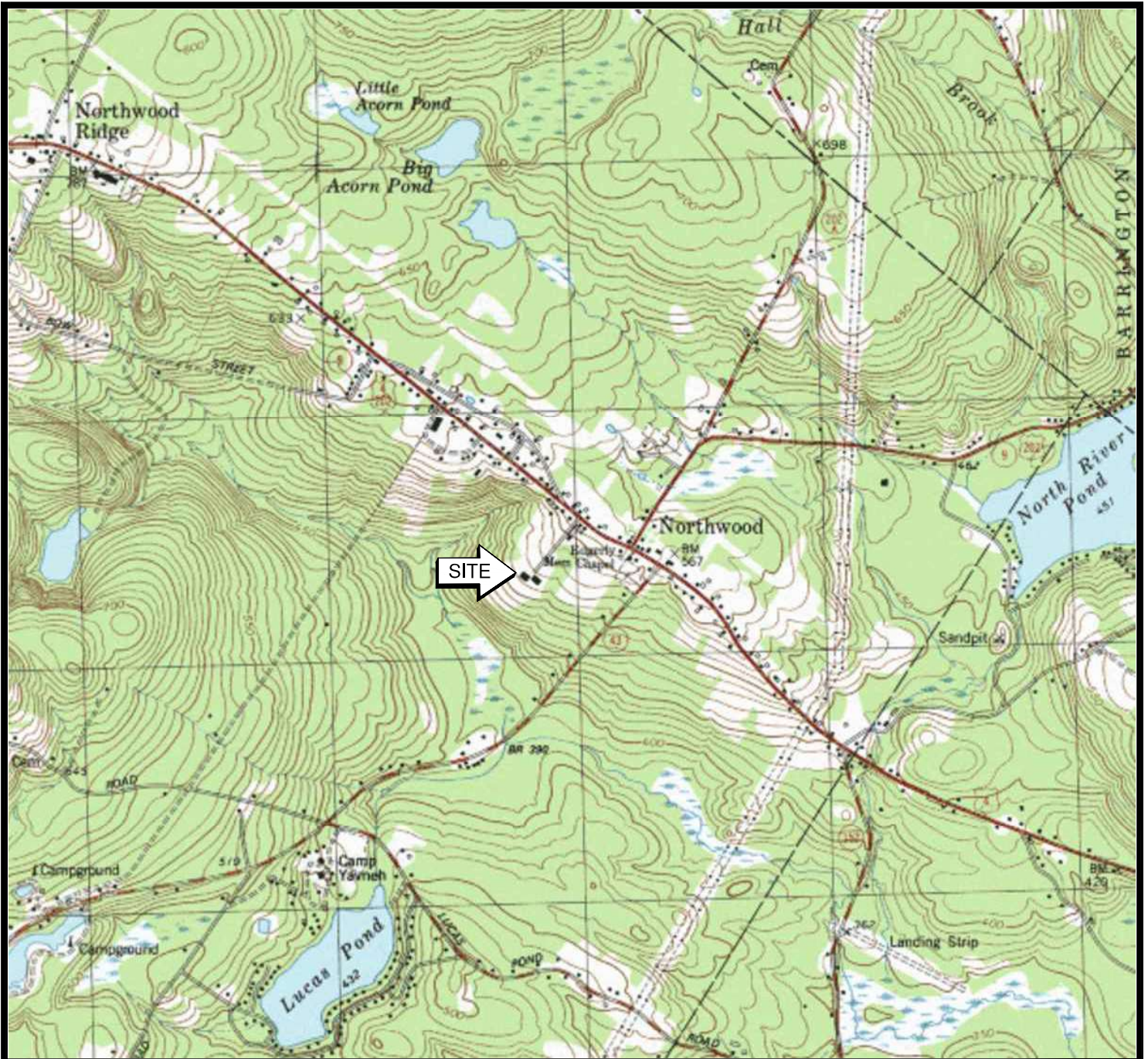
Instructions (see 2021 MSGP Part 6.3):

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

- If you need to modify the SWPPP in response to a corrective action required by Part 5 of the 2021 MSGP, then the certification statement in Section 7 of this SWPPP must be re-signed in accordance with 2021 MSGP Appendix B, Subsection 11.A.
- For any other SWPPP modification, you should keep a log with a description of the modification, the name of the person making it, and the date and signature of that person. See 2021 MSGP Appendix B, Subsection 11.C.

Note: A copy of this SWPPP and 2021 MSGP is kept on-site.

F I G U R E S



USGS TOPOGRAPHIC MAP
 NORTHWOOD, NEW HAMPSHIRE
 1981

APPROXIMATE SCALE
 1 INCH = 2,000 FEET



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QUADRANGLE LOCATION

FIGURE 1

LOCUS PLAN
HARDING METALS, INC.
 42 HARDING DRIVE
 NORTHWOOD, NEW HAMPSHIRE

PROJECT: 65150.08

DATE: MAY 2021

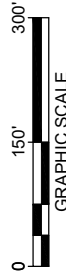
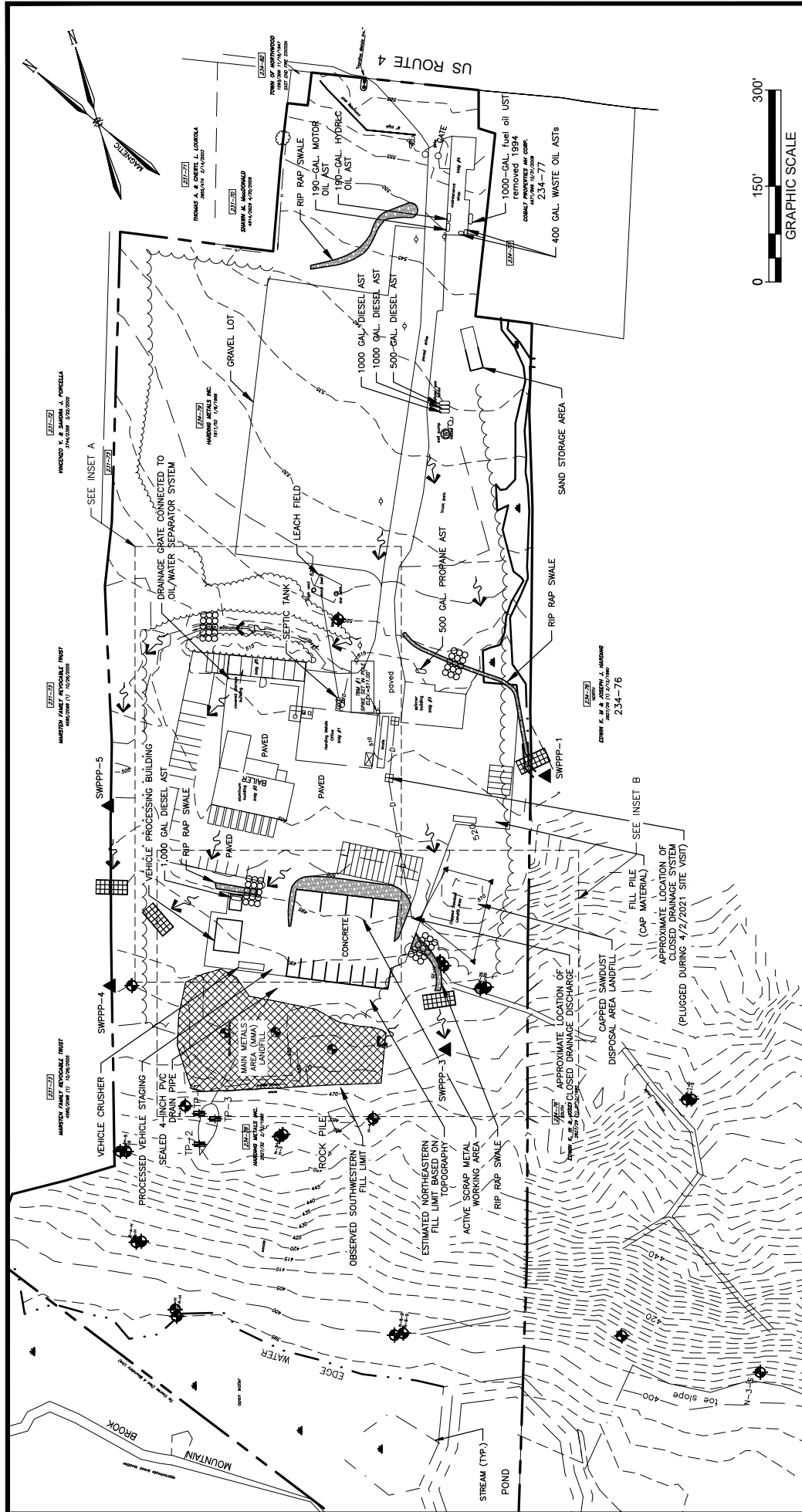


FIGURE 2
SITE SKETCH
STORMWATER POLLUTION PREVENTION PLAN
HARDING METALS, INC.
 42 HARDING DRIVE
 NORTHWOOD, NEW HAMPSHIRE

DRAWN BY: NJZ
 CHECKED BY: JCN
 PROJECT NO: 65150.08
 DATE: MAY 2021



- LEGEND**
- SITE BOUNDARY
 - - - PROPERTY LINE
 - 1-H MONITORING WELL
 - ▲ SWPPP-1
 - SWPPP SURFACE WATER SAMPLE LOCATION
 - STORMWATER RUNOFF
 - ▤ HAY BALES
 - ⊞ STONE CHECK DAMS

NOTES:

- THIS PLAN WAS DEVELOPED FROM A TOPOGRAPHIC PLAN FOR TAX MAP 234 LOTS 78 AND 79, HARDING METALS INC. BY WILLIAM T. WORRELL DATED AUGUST 24, 2015 AND REVISED BASED ON OBSERVATIONS MADE BY NOBIS GROUP IN APRIL 2021. DUE TO FACILITY MODIFICATIONS, THE DISCHARGE LOCATIONS FROM THE SOUTHERN PORTION OF THE SITE HAVE CHANGED. SAMPLING LOCATIONS SWPPP-3 AND SWPPP-4 WERE MODIFIED ACCORDINGLY. SAMPLING LOCATION SWPPP-2 NO LONGER RECEIVES STORMWATER RUNOFF DUE TO THE FACILITY MODIFICATIONS AND HAS BEEN ELIMINATED.
- APPROXIMATE LOCATION OF CLOSED DRAINAGE DISCHARGE (PLUGGED DURING 4/2/2021 SITE VISIT)

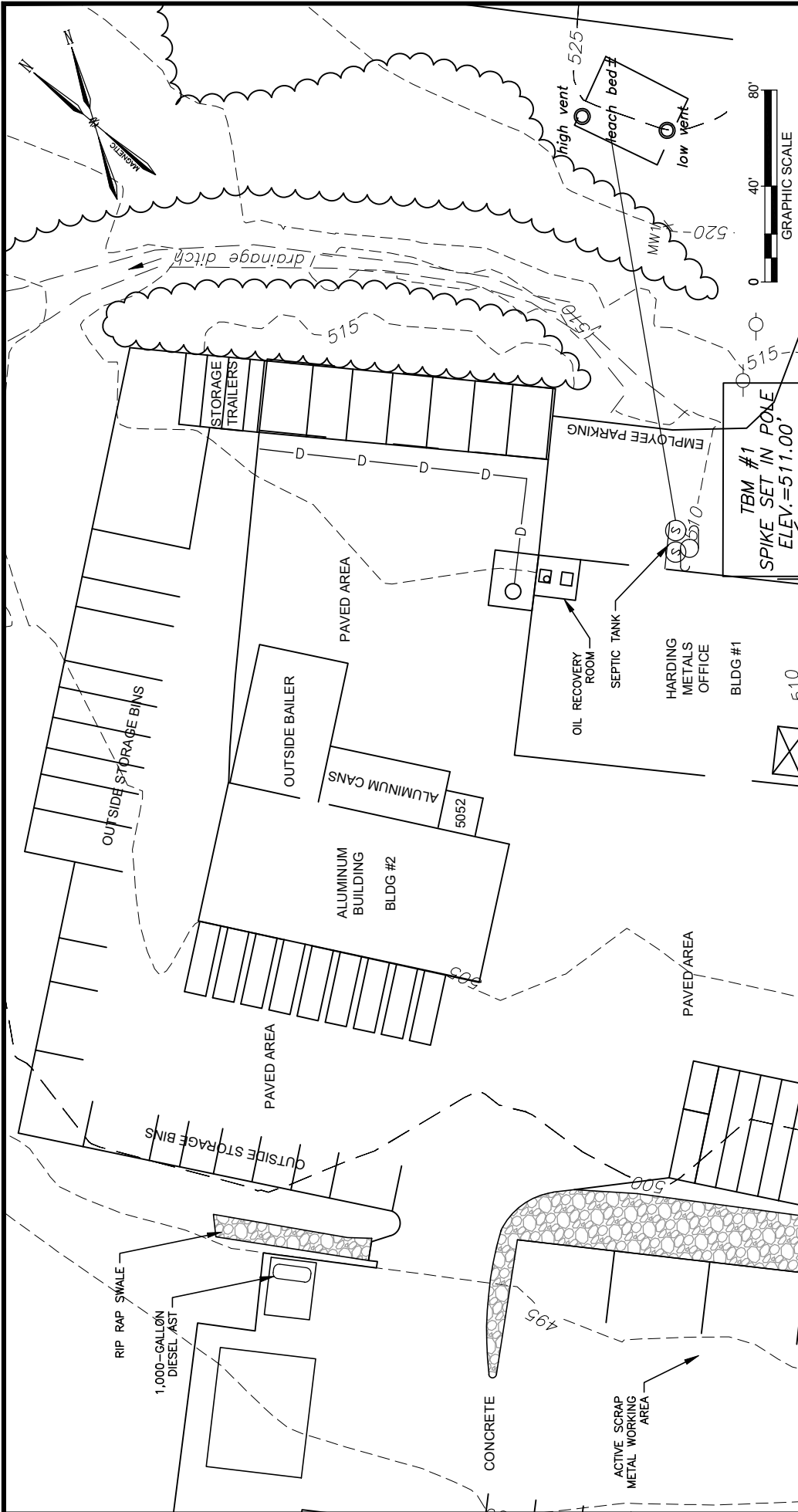


FIGURE 3A

INSET A

STORMWATER POLLUTION PREVENTION PLAN

HARDING METALS, INC.

42 HARDING DRIVE

NORTHWOOD, NEW HAMPSHIRE

DRAWN BY: NJZ
PROJECT NO: 65150.08

CHECKED BY: JCN
DATE: MAY 2021

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TBM #1
SPIKE SET IN POLE
ELEV. = 511.00'

NOTES:

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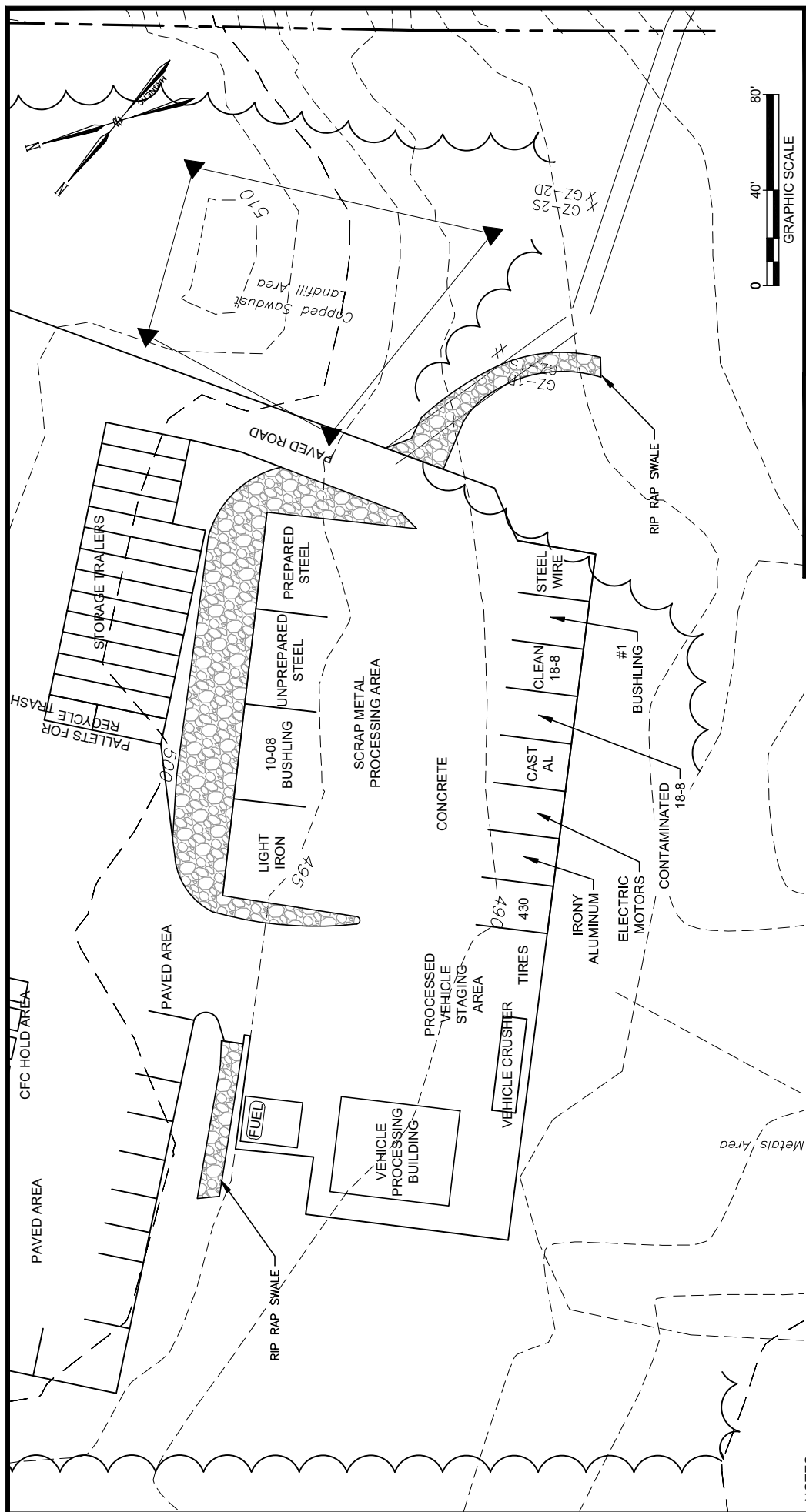


FIGURE 3B
INSET B
STORMWATER POLLUTION PREVENTION PLAN
HARDING METALS, INC.
42 HARDING DRIVE
NORTHWOOD, NEW HAMPSHIRE



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DRAWN BY: NJZ
 PROJECT NO: 65150.08
 CHECKED BY: JCN
 DATE: MAY 2021

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