



Environmental Policy

We are committed to providing a quality service in a manner that ensures a safe and healthy workplace for our employees and minimises our potential impact on the environment. We will operate in compliance with all relevant environmental legislation and we will strive to use pollution prevention and environmental best practices in all we do.

We will:

- integrate the consideration of environmental concerns and impacts into all of our decision making and activities,
- promote environmental awareness among our employees and encourage them to work in an environmentally responsible manner,
- train, educate and inform our employees about environmental issues that may affect their work,
- reduce waste through re-use and recycling and by purchasing recycled, recyclable or re-furnished products and materials where these alternatives are available, economical and suitable,
- promote efficient use of materials and resources throughout our facility including water, electricity, raw materials and other resources, particularly those that are non-renewable,
- avoid unnecessary use of hazardous materials and products, seek substitutions when feasible, and take all reasonable steps to protect human health and the environment when such materials must be used, stored and disposed of,
- purchase and use environmentally responsible products accordingly,
- where required by legislation or where significant health, safety or environmental hazards exist, develop and maintain appropriate emergency and spill response programmes,
- communicate our environmental commitment to clients, customers and the public and encourage them to support it,
- strive to continually improve our environmental performance and minimise the social impact and damage of activities by periodically reviewing our environmental policy in light of our current and planned future activities.

Signature of person responsible for policy:

Print name: _____

Signature: _____

Position: _____

Date: _____

SWPPP

Storm Water Pollution Prevention Plan

In accordance with the MDEQ NPDES program

Prepared for

Team Elmer's of Ludington

March 17, 2017 (updated from previous SWPPP)

Prepared by

Tom Wolf
Environmental Compliance Manager
Team Elmer's
P.O. Box 6150
Traverse City, MI 49696
Phone: (231) 943-3443
Email: twolf@teamelmers.com

General Facility Information	3
Overview	4
Site Map Requirements	5
Significant Materials.....	6
Past Spills and Leaks.....	7
Best Management Practices	8
Non-Storm Water Discharges	14
Record Keeping and Reporting	15
SWPPP Certification.....	16

Appendix A

Site Map
Significant Materials Inventory
Current Certificate of Coverage
Current CSWO Certificate

Appendix B

Routine and Comprehensive Inspection Log.....	Form 1
Employee Training Records.....	Form 2
Annual SWPPP Review Forms	Form 3
Visual Assessment Procedure, Forms and Records	

Appendix C

PIPP (Pollution Incident Prevention Plan)	
! In The Event of a Spill or Release.....	PIPP 4
Elmer's Significant Spill Report Form	
MDEQ Spill or Release Report Form	

FACILITY NAME AND ADDRESS

Elmer's Concrete of Ludington
2775 W. US-10
Ludington, MI 49431
(231) 845-7351

FACILITY MANAGER

Tom Patterson
(231) 463-2416

CERTIFIED STORM WATER OPERATER

Tom Patterson
Certification Number: I-14745

NPDES PERMIT NUMBER

MIS 120608

SIC CODE

3273

PARENT COMPANY NAME AND ADDRESS

Elmer's Crane & Dozer, Inc.
3600 Rennie School Rd.
Traverse City, MI 49685
(231) 943-3443

CONTACT PERSON FOR PERMITTING

Tom Wolf, CSWO
Team Elmer's Environmental Compliance Manager
P.O. BOX 6150
Traverse City, MI 49696-6150
(231) 943-3443
twolf@teamelmers.com

This storm water pollution prevention plan (SWPPP) covers the operation at Elmer's Concrete of Ludington. It has been developed as required under Part I.B of Michigan's National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges and in accordance with good engineering practices. This SWPPP describes this facility and its operations, identifies potential sources of storm water pollution at the facility, recommends appropriate best management practices (BMPs) to reduce the discharge of pollutants in storm water runoff, and provides for periodic review of this SWPPP.

The original SWPPP was made effective as of September 30, 2006. The original structural and non-structural controls were implemented by September 30, 2006.

The goal of a SWPPP is to prevent storm water from contacting contaminants before being discharged into the receiving waters. Industrial facilities subject to an NPDES permit are required to prepare and implement a site specific SWPPP.

The objective of this SWPPP is three-fold:

1. To identify potential sources of pollution at Elmer's Concrete of Ludington
2. To describe BMPs, which are to be used at Elmer's Concrete of Ludington
3. To implement preventative procedures such as, but not limited to, a facility inspection program, site compliance evaluation program, record keeping and reporting program that will help Elmer's Concrete of Ludington comply with the terms and conditions of the NPDES program.

A sitemap of Elmer's Concrete of Ludington is included in appendix A. It shows the following items which are required by the NPDES permit.

- Property boundaries
- Buildings and other permanent structures
- Storage or disposal areas for significant materials
- Storm water discharge outfalls
- Location of storm water inlets contributing to each outfall (N/A)
- Drainage areas contributing to each outfall
- Location of NPDES permitted discharges other than storm water (N/A)
- Structural runoff controls and storm water treatment facilities
- Areas of vegetation
- Areas of exposed and/or erodible soils
- Impervious surfaces (roof tops , asphalt, concrete)
- Names and locations of receiving waters
- Areas of known or suspected impacts on surface waters as designated under Part 201 of the Natural Resources and Environmental Protection Act of 1994, Public Act 451 (formerly Act 307) (N/A)
- Locations where the following activities are exposed to storm water:
 - Fixed fueling operations
 - Vehicle and equipment maintenance and/or cleaning areas
 - Loading and unloading areas
 - Waste storage or disposal areas
 - Liquid storage tanks
 - Equipment operating areas
 - Storage areas
- Any other areas deemed appropriate

See Site Map, Appendix A

The permit requires a general inventory of significant materials on site. For each significant material on site an evaluation is to be conducted to determine the potential for these materials to enter storm water and subsequently contaminate runoff being discharged from the facility.

A significant material is defined as any material which can impair or degrade water quality.

See the chart in **Appendix A** which lists the areas or process, the material, method of exposure, and outfall it may effect in the following permit defined categories:

1. Loading, unloading and other material handling operations
2. Outdoor storage, including secondary containment structures
3. Outdoor manufacturing or processing activities
4. Significant dust or particulate generating processes
5. Discharges from vents, stacks and air emission controls
6. On-site waste disposal practices
7. Maintenance of cleaning of vehicles, machines and equipment
8. Areas of exposed and/or erodible materials
9. Site of environmental contamination listed under Part 201 (environmental response) of the Michigan Act
10. Areas of significant material residues
11. Areas where animals congregate and deposit wastes (N/A)
12. Other areas where storm water may contact significant materials

See Appendix A

The permit requires a listing of oil and other polluting materials that have been spilled or leaked the present back to three years prior to the completion of this SWPPP. In the event of a spill, in addition to following the PIPP notification procedures, it shall be documented in the table below. Include the date, volume of material released, the exact location of release, and the actions taken. Actions taken shall summarize what was implemented to clean up the materials and/or prevent exposure of the materials to storm water runoff or contamination of surface waters of the state.

DATE	MATERIAL	VOLUME	LOCATION	ACTIONS TAKEN
10/18/16	None to date			

Storm Water Sampling Data

No storm water sampling data is available or recorded.

Best management practices (BMPs) are storm water management controls implemented to reduce the amount of pollutants in storm water discharged from Elmer's Concrete of Ludington.

The permit requires that the following categories of BMPs to be considered, and selected where applicable.

NON-STRUCTURAL CONTROLS

Non-structural controls are practices that are specifically intended to reduce the amount of pollution entering surface waters. These are generally implemented to address the problem at the source. They do not require any structural changes to the facility. The following non-structural controls have been selected for implementation:

Preventative Maintenance

Preventative Maintenance involves the regular inspection, testing, and cleaning of facility equipment and operational systems. These inspections will help to uncover conditions which create a higher risk of a release of materials. Action can then be taken to reduce said risk.

Routine inspections shall be made and recorded (Form 1, Appendix B) after any significant rainfall event or every two-weeks minimum.

The following equipment/activities will be included in the preventative maintenance program. (Examples: fuel pumps, storage tanks for waste fluids, all structural controls, etc.)

Equipment	Tasks	Frequency
Loader and Trucks	Visual inspection	Daily by driver (not documented)
Loader and Trucks	Mechanical maintenance	200 hrs / 3500 miles
Building and grounds	Walk through inspection	Bi-weekly
Fuel tanks	Visual inspection	Bi-weekly
Additive tanks	Visual inspection	Bi-weekly
Silos	Visual inspection	Bi-weekly
Washout pit	Visual inspection	Daily
Oil and Chemicals	Keep inside of building	Daily
Yard and Shop	Keep organized and clear of obstructions	Daily

Comprehensive Inspections

Comprehensive inspections of the facility (equipment, plant areas, and structural controls) are required by the permit. These inspections must occur at least once every three months. Records of the inspections must be kept on file with the SWPPP (Form 1, Appendix B).

The recommended schedule for comprehensive inspections is the first week of the months of April, July, October, and the end of December.

If during the year there comes a time that a special event is causing the cleaning of the facility, such as an open house, this could be a good time to do an inspection.

Good House keeping Practices

Good housekeeping practices are designed to maintain a clean and orderly work environment. This will reduce the potential for significant materials to come in contact with storm water.

The following practices are included in our good housekeeping routine:

Area/Equipment	Tasks	Frequency
Building / storage area	floor picked up and swept	weekly or sooner
Aggregate storage area	store material inside bins and neat stockpiles	always
Loader and Trucks	cleaning inside and out	daily
Recycle washout pit	clean compartments	when needed
Containers	store per mfg. specifications	always
Containers	keep lids securely closed	whenever not in use

Keeping areas clean will allow for spills to be more readily identified. It will also keep accidents caused by clutter to a minimum. Cleaning the vehicles daily (i.e. the windshield for visibility) will reduce the possibility of accidents. Keeping the aggregate within defined areas (block wall enclosures) will improve efficiency for the loader operator as well as keeping the aggregate from reaching outfalls.

Spill Prevention and Response Procedures

Spills and leaks together are the largest industrial source of storm water pollution. This SWPPP specifies material handling procedures and storage requirements for significant materials. Equipment and procedures necessary for cleaning up spills and preventing the spilled materials from being discharged have also been identified. A Pollution Incident Prevention Program (PIPP) has been implemented at this facility. **The PIPP includes the spill response procedure** and is tabbed for easy access in appendix C. This shall be included in the training for all employees.

Sedimentation Control Measures

There may be certain areas at the facility that are prone to soil erosion. These areas need to be protected as needed, and the sediment prevented from being discharged with the storm water. If these areas become consistently problematic, silt fence may need to be considered, as well as possibly re-grading the area or providing pavement.

Aggregate is stored outside and is open to the elements without secondary containment. Some aggregate materials do not contain fines and/or sediment and are thus not a risk erosion. Aggregate that is at risk for erosion should be stored in bins (e.g. concrete block bins) or neatly stockpiled. Stockpiles and bins should be located in areas that are not subject to significant storm water flow from up hill areas. Do not locate aggregate piles next to the storm water outlets. Erosion of a significant quantity of material from the piles is not likely, even in a large storm event, if the piles are located properly. Routine inspections of the piles is usually sufficient to identify minor erosion before it becomes significant.

Liquid Storage

Concrete admixtures and oils shall be stored inside the building whenever possible, which adds extra security for preventing a spill. Whenever storage is outside, store in an area that is not within normal traffic flow or near a storm water outlet.

The fueling station provides secondary containment (usually in the form of a double wall tank). Visual inspections of this area should be routine to identify any spills from misuse of pumps or filling procedures.

Area of concern	Control Measures
Aggregate storage area	Concrete bins / grading (if possible)

Employee Training

Employee training is a major component in ensuring the success of the facility's SWPPP. The more knowledgeable employees are of the facility's SWPPP and what is expected of them, the greater the chance the plan will be successful.

Upon being hired at Elmer's, each person is required to go through an orientation program before starting work. This orientation includes safety, accident reporting, hazard communications, and personal protective equipment. The SWPPP training schedule is to be incorporated into the initial training and orientation of the specific plant by the plant manager/CSWO.

The following is a description of the ongoing employee training programs to inform appropriate personnel at all levels of responsibility of the components and goals of the SWPPP. Some training might be a 10 minute meeting as a refresher course. Other training may be longer to update the team members of new equipment, chemicals, or procedure changes that have happened. This longer training will most likely be in the spring when some of the team members come back from lay off. The plant manager/CSWO is responsible for recording employee training events in the SWPPP.

Topic	Employee Included	Frequency
Spill response (PIPP)	All	Annual (spring)
Awareness of Significant Materials and proper storage	All	Annual (spring)
Safety and housekeeping	All	Weekly (tailgate)
Safety and housekeeping	Truck drivers, Loader operators	As needed
House keeping (building)	Facility workers	As needed

List of Significant Materials Still Present

After the implementation of the non-structural controls, any significant materials expected to be present in the storm water discharge are to be addressed through the use of structural controls.

For this facility, with proper non-structural controls in place, there is no expected significant materials to be regularly present in the storm water being discharged from the facility. The only exception could possibly be sediment from the aggregate piles in an extreme rainfall event.

STRUCTURAL CONTROLS

Structural control measures are implemented to control any pollutants that may be present in the storm water after the non-structural controls have been implemented. These types of controls are physical features that control and prevent storm water pollution. They can range from preventative measures to collection structures to treatment systems. Structural controls require construction of a physical feature or barrier.

Preventive Measures

Preventive measures are controls which are intended to prevent the exposure of storm water to contaminants. The following preventative measures are implemented at this facility:

Area	Material	Control Measure
Truck wash out	Heavy metals	Recycle wash lagoon
Raw material storage	Aggregate	Concrete bins

Diversions

Diversion practices are structures (including grading and paving) that are used to divert storm water away from high risk areas and prevent contaminants from mixing with the runoff, or to channel contaminated storm water to a treatment facility or containment area. The following can be used for diverting storm water:

- Swales / ditches
- Berms
- Curbs and gutter
- Culverts / catch basins / storm sewer
- Land shaping (directing sheet flow)

With heavy equipment onsite, grading of an area can be accomplished with minor planning. When aggregate piles are created or moved, it may be determined that grading of an area is required for storm water to be diverted to another area. The CSWO is authorized to direct the loader operator to do this minor grading from time to time. If the grading significantly changes the site, then the CSWO will notify the Environmental Compliance Manager to revise the site sketch.

Area	Material	Control Measure
Raw material storage	Aggregate	Grading when necessary
Fuel area	Diesel fuel	Sand: block ditch

Containment

Containment areas are structures designed to hold pollutants or contaminated storm water to prevent it from being discharged to surface waters. These structures can range from drip pans to large containment areas typically required for Pollution Incident Prevention Plans (PIPP) or Spill Prevention, Control and Countermeasures (SPCC) plans.

Containment structures will be/have been installed in the following areas:

Area	Material	Control Measure
Fuel Tanks	diesel and unleaded fuel	Dual walled tanks
Washout pit	Concrete washout	Lagoon containment

Other Controls

There are other control measures that can be used that may not fit into one of the previously mentioned categories. The following additional controls have been used at the facility:

Area	Material	Control Measure
Fuel Tanks	Fuel	Security: Pump is locked during off-hours
Entrance	All	Lock entrance gate
Floor Drain		Plugged with Conc. In 2011

NON-STORM WATER DISCHARGES

The permit requires that all discharges be evaluated. Any unauthorized storm water discharges must be eliminated, or covered under another National Pollutant Discharge Elimination System (NPDES) permit. Certification that there are no unauthorized discharges must be submitted to the appropriate district supervisor. The following is a list of non-storm water discharges authorized under the general permit:

- Firefighting activities
- Fire hydrant flushing
- Potable water sources including waterline flushing
- Irrigation drainage
- Lawn watering
- Uncontaminated ground water
- Foundation or footing drains
- Building wash down where no detergents were used
- Air conditioning condensate
- Dust control spraying

Date	Outfall	Method	Evaluator	Observations	Date Corrected
8/26/11				None currently	

Except for the list above, no water shall be discharged from the site except for storm water generated from a rainfall event. Any discovery of non-storm water discharges shall be logged in the table above and corrected (eliminated or permitted under separate permit if applicable). The signature of the CSWO at the end of this plan will attest to the CSWO's confirmation that no illicit, non-storm water discharges are occurring from this site.

Required Regular Documentation

The permit requires the documentation and keeping of records for three years of all of the following regular tasks:

Routine Inspections (after rainfall event or bi-monthly)

Routine inspections shall be conducted as described under the Preventative Maintenance section on page 8 of the SWPPP. Inspections shall be recorded on the NPDES Routine and Comprehensive Inspection Log (Form 1, appendix B)

Comprehensive Inspections (quarterly)

Comprehensive inspections shall be conducted quarterly as described on page 9 of the SWPPP. Inspections shall be recorded on the NPDES Routine and Comprehensive Inspection Log (Form 1, appendix B)

Employee Training (annually or as needed)

Employees shall be trained as indicated under Employee Training on page 11 of the SWPPP. Training sessions shall be recorded in Form 2 of Appendix B.

Visual Assessment

A Visual Assessment of the storm water discharge shall be performed as described in the Visual Assessment Written Procedures in Appendix B.

SWPPP Report (annually)

The permit requires that Elmer's Concrete of Ludington (with assistance from corporate if needed) prepare an annual report discussing the effectiveness of the SWPPP. This report should include any changes that have been made, the reason for the changes, any spills that occurred, what actions were taken as a result of the spill, inspection results, and any other information relevant to the SWPPP. The annual report is to be retained on site. It does not need to be submitted to the MDEQ. This report can be completed using Form 3 in appendix B.

OTHER RECORD KEEPING AND REPORTING FORMS

Appendix B also contains the following forms for other record keeping and reporting associated with the SWPPP:

- Non-storm Water Inspection Report (appendix B)
- Preventative Maintenance Form (appendix B)
- Significant Spill Report (PIPP plan, Appendix C)

RECORDS ACCESS

This SWPPP and required documentation must be made available, upon request, to a representative of the Michigan Department of Environmental Quality (MDEQ). In the case of facilities which discharge storm water to a municipal separate storm sewer system, the records must also be made available to the operator of the municipal system.

I certify under penalty of law that the storm water drainage system in this SWPPP has been evaluated for the presence of non-storm water discharges either by me, or under my direction and supervision. I certify under penalty of law that this SWPPP has been developed in accordance with the General Permit and with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. At the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Signature of Certified Operator

Certification Number

Print Name

Date

Signature of Corporate Officer

Date

Print Name

Title

TEAM

Elmer's

Appendix A

SITE MAP

&

LIST OF SIGNIFICANT MATERIALS

TEAM

Elmer's

Appendix B

RECORD KEEPING FORMS

EMPLOYEE TRAINING RECORD

Date of Session: _____

Time: _____

Trainer : _____
 printed

Signature

Attendees (names, printed):

Signatures:

Topics Covered: _____



NON-STORM WATER INSPECTION REPORT

Date of Inspection: _____ Time: _____

Inspected by (printed name): _____

Signature: _____

Type of inspection (circle those that apply):

- visual observation
- dye tests
- smoke tests
- TV line survey
- analysis of accurate schematics
- sampling/monitoring

Observations/Results: _____

Are there any non-storm water discharges? yes no

Is the discharge authorized under this permit? yes no

Is the discharge covered under another National Pollutant Discharge Elimination System (NPDES) permit? yes no

Are significant structural changes required to eliminate the discharge? yes no

TEAM



PREVENTIVE MAINTENANCE RECORD

Date: _____

Time: _____

Equipment number _____

Service Location _____

Explain what was done _____

Inspected by (printed): _____

Signature: _____

TEAM

Elmer's

Appendix C

**PIPP
Pollution Incident Prevention Plan**

PIPP

Pollution Incident Prevention Plan

Part of the MDEQ Emergency Response program

FACILITY NAME AND ADDRESS

Elmer's Concrete Plant of Ludington
775 W. US-10
Ludington, MI 49431
(231) 845-7351

PARENT COMPANY NAME AND ADDRESS

Elmer's Crane and Dozer, Inc.
3600 Rennie School Rd.
Traverse City, MI 49689
(231) 943-3443

DESIGNATED SPILL PREVENTION AND CONTROL COORDINATOR

Tom Patterson
(231) 463-2416
tpatterson@teamelmers.com

ENVIRONMENTAL COMPLIANCE MANAGER

Tom Wolf
(231) 943-3443
twolf@teamelmers.com

FACILITY DESCRIPTION AND OPERATIONS

This facility functions as a concrete redi-mix plant and subsequent aggregate storage yard. The site is relatively flat with adjacent isolated wetlands. Nearby drainage ditches do connect eventually with state waters, so this site is covered under a NPDES general permit held by the Michigan Department of Environmental Quality.

All of the chemicals and liquids stored and used onsite are those commonly utilized in a concrete batch plant and a mechanical maintenance shop. Most of the chemicals and liquids at this facility are stored and utilized indoors, with the exception of a few fuel storage tanks, a calcium chloride tank and the cement silos.

THRESHOLD REPORTING QUANTITIES

A Threshold Reporting Quantity (TRQ) defines the minimum amount at which a spill or release must be reported. Releases above this amount must be reported:

1. A release of oil to the surface of the ground of 50 lbs or more.
2. A release of oil to the waters of the state of any quantity that causes unnatural turbidity, color, visible sheens, oil films, foams, solids, or deposits in the receiving water body.
3. A release of salt to the surface of the ground, ≥ 50 pounds in solid form, or ≥ 50 gallons in the liquid form.
4. A release of any other polluting material per table 1 of Part 5 rules (review MSDS sheet and contact Elmer's Environmental Compliance Manager for assistance in determining TRQ)

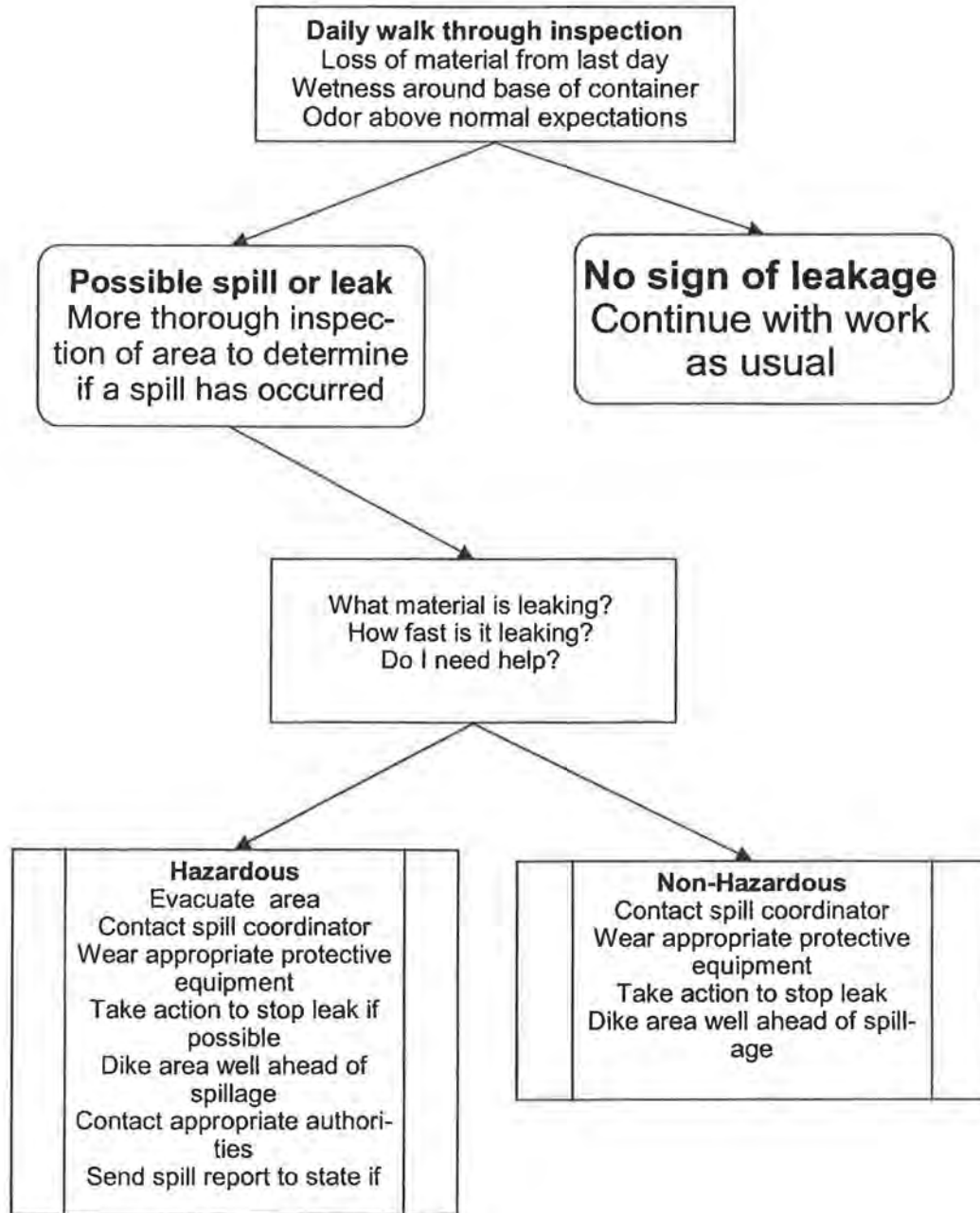
! A release does not need to be reported if it does not reach the sewer or State waters and meets the following:



- Spill of 1,000 gallons or less contained by secondary containment and completely cleaned up within 24-72 hours.
- Oil spill of under 55 gallons to the ground that is detected and cleaned up within 24 hours.
- Oil spill of under 55 gallons to surface water that is effectively cleaned up immediately upon detection.

SITUATION ASSEMENT PROCEDURES

1. Upon noticing a release determine within seconds if the leak can be controlled without assistance.
2. If assistance is required, contact the spill coordinator (plant manager)
3. Begin containment and clean up procedures immediately if safe.
4. Determine if it is a reportable release simultaneously with #3.



RESPONSE PROCEDURE

 **If there is a personal safety hazard, all personal shall EVACUATE the vicinity IMMEDIATELY.**

Contain the spill or release first, if able to do so safely in a matter of seconds.

Contact the spill coordinator immediately (see notification procedure, next page)

MAJOR CLEANUP / CONTAINMENT

If release is beyond Elmer's immediate ability to control or remedy, the spill coordinator shall contact the Emergency Response Contractor immediately:

Northern A-1 Services, **1-800-544-2663** (24 Hour)

CONTAINMENT

Caution, if material is flammable, do not operate any equipment in the vicinity! The following are recommended procedures depending on the type of spill, location, and material spilled:

- Use onsite equipment to dike soil or aggregate around spill area to slow or prevent spread.
- Construct emergency ditch or berm to divert spill from leaving site or entering nearby drainage paths.
- Dumpster or washout lagoon can be used as an emergency container
- Dike or scoop with loader bucket
- Squeegee, sweep, or scoop into a container.
- Utilize oil absorbent brooms, pads, and rags to coral and soak up.
- Sump pump or trash pump (do not use for oil or fuel)
- Spread sand, sawdust or woodchips over spilled liquid to soak it up

CLEANUP

- Squeegee, sweep, or scoop into an approved container.
- Utilize oil absorbent brooms, pads, and rags to coral and soak up.
- Sump pump or trash pump (do not use for oil or fuel) into approved container
- Spread sand, sawdust or woodchips over spilled liquid to soak it up
- Fuel sheen on water surface can be soaked up with an oil sponge
- Small oil product spills on to the floor can be soaked up with sand, placed into a garbage bag, and disposed of in the dumpster.
- Small fuel or oil spills on to the ground can be dug up and disposed of in a garbage bag into the dumpster.
- Always disclose the nature of the waste to the landfill and/or waste hauler to ensure proper disposal.

NOTIFICATION PROCEDURE

All employees shall immediately notify the spill coordinator when a spill or release occurs, no matter how small. The spill coordinator shall contact the following (or direct the employee or corporate to do so, if required).

FOR ANY RELEASE

- Spill coordinator for the facility: Tom Patterson 231-463-2416
- Environmental Compliance Mgr: Tom Wolf **231-943-3443**

REPORTABLE RELEASE (If above Threshold Reporting Quantity, see pg. 24)

- If after hours, Elmer's President: Troy Broad **231-943-3443** (24 Hr)
- MDEQ Michigan Department of Environmental Quality
During business hours: Ryan Blazic **989-705-3420**
or
After business hours: PEAS System **1-800-292-4706**
(Pollution Emergency Alerting System)
- Call **911** Emergency Services (required by law) **911**

REPORTS

Reports documenting a reportable release shall be submitted to the MDEQ and County Health Department within 10 days. See reporting forms included at the end of this plan

CLEANUP AND/OR CONTAINMENT

If release is beyond Elmer's immediate ability to control or remedy, the spill coordinator shall contact the Emergency Response Contractor immediately:

- Northern A-1 Services, **1-800-544-2663** (24 Hour)
2305 US 131 NE
Kalkaska, MI 49646

MATERIAL STORED AND USED AT THIS FACILITY

List of chemicals, oils and fuels in containers with capacity over 55 gal

AST	UST	Product	Capacity	Unit	Inside/Outside Building
X		Diesel fuel	1,000	gal	Outside
X		Diesel fuel	1,000	gal	Outside
X		Diesel fuel	500	gal	Outside
X		Recycled used oil	1,000	gal	Inside
X		Portland cement powder	86	ton	Outside
X		Portland cement powder	56	ton	Outside
X		Fly ash	40	ton	Outside
X		Calcium chloride	5,000	gal	Outside
X		AEA-14 (conc. additive)	1,000	gal	Inside
X		Plastiment ES (conc. additive)	1,000	gal	Inside
X		Sikaplast 500 (conc. additive)	1,000	gal	Inside
X		Sikament 686 (conc. additive)	1,000	gal	Inside
X		Sikaset NC (conc. additive)	1,000	gal	Inside

OTHER MATERIALS

Other materials typical found onsite in 55-gallon drums include

- form oil
- hydraulic oil
- motor oil
- transmission fluid

It is typical to only have one to two drums of each product onsite at a time. These drums are typically stored indoors.

WHAT IS SECONDARY CONTAINMENT?

Secondary containment provides a contained volume that is equal to or greater than the primary tank or container that would contain the liquid or material in case of a primary tank spill or release. Secondary containment by definition is a preventative measure that is in place prior to a spill, not a reactive measure taken after or during a release.

It should be noted that having secondary containment is required for some tanks and materials, but is always recommended when practical.

In a release event where the secondary containment effectively contains the release from the primary container, it may effect whether the release is reportable or not. In such event, please review the threshold reporting quantities section on page PIPP 2.

FACILITY SECONDARY CONTAINMENT

The following list catalogs the secondary containment that is currently in place at this site:

Diesel Fuel Tanks—Secondary containment is required. Requirement is met by using dual walled tanks. The visible outer shell of the tank is the secondary containment structure. Any fuel spill or release outside of the tank structure has breached the secondary containment.

Recycled Used Oil (1,000 gal, used for heating fuel)—Secondary containment is required by EPA through the SPCC plan. Secondary containment is provided by the fabricated steel walled enclosure around the tank.

55 gallon drums and all chemicals within the shop—Secondary containment is provided by the concrete shop floors. Since the shop floors do not contain a working floor drain, any spills would be contained within the shop due to the floor slope and sumps. The floor drain in the shop was plugged with concrete in August of 2011 in response to a request contained in at May 31, 2011 letter from the MDEQ.

Calcium Chloride—no secondary containment

Portland Cement—no secondary containment

The number one way to prevent spills is to keep the work environment clean and orderly, which includes keeping the liquids in their proper place, and properly secured in their proper containers. This is achieved first through instruction and continued oversight by the plant manager. The second is through safe work practices that minimize accidents during daily operations.

STAFF TRAINING

Initial jobsite safety training is provided by corporate management at date of hire and annually thereafter (usually around March). Specific safety issues and procedures of this facility are taught and implemented by the plant manager. Weekly meetings are held to discuss work site safety. The plant manager is responsible for ensuring that all employees at the facility are aware of the following:

1. Location of all hazardous chemicals and liquids of significant volume
2. Environmental and Personal safety hazards of said chemicals
3. Proper handling and storage of chemicals and liquids onsite
4. What to do in case of a spill or release
5. Location of facility contingency plans

DAILY PROCEDURES

- Store all chemical and liquids in proper, approved containers
- Keep all containers secure (lids tight, stable footing)
- Keep all containers out of high traffic areas
- Keep containers away from heavy equipment
- When transfer liquids and chemicals in or out of containers, do so in areas of secondary containment whenever possible (shop floor)
- Operate heavy equipment with care around outside tanks
- Keep the shop, office and yard clean and picked up
- Visually inspect containers for leaks (and the ground around them)

PRECIPITATION MANAGEMENT

This facility is subject to an industrial NPDES general permit. Precipitation management is discussed in length in the SWPPP.

SECURITY MEASURES

During off-hours, the entrance gate is locked to prevent unauthorized vehicle entry. The fuel tanks are also locked from use (pump power switch) as well as the building which contains most of the chemicals and liquids.

SIGNIFICANT SPILL REPORT

Date of Occurrence: _____

Discovered by Whom: _____

Location: _____

Material Type & Volume: _____

Cause of Spill: _____

Corrective Action Taken: _____

Agencies/Persons Contacted: _____

Signature: _____ Date: _____



SPILL OR RELEASE REPORT

NOTE: Some regulations require a specific form to use and procedures to follow when reporting a release. Those forms and procedures MUST be used and followed if reporting under those regulations. This report form is to aid persons reporting releases under regulations that do not require a specific form. This report form is not required to be used. To report a release, some regulations require a facility to call the PEAS Hotline at 800-292-4706, or DEQ District Office that oversees the county where it occurred, and other regulating agencies and provide the following information. A follow-up written report may be required. Keep a copy of this report as documentation that the release was reported. If you prefer to submit this report electronically by FAX or e-mail, contact the regulating agency for the correct telephone number or e-mail address. See the DEQ website on Spill/Release Reporting for more reporting information.

Please print or type all information.

Form with fields: NAME AND TITLE OF PERSON SUBMITTING WRITTEN REPORT, TELEPHONE NUMBER, NAME OF BUSINESS, STREET ADDRESS, CITY, STATE, ZIP CODE, BUSINESS TELEPHONE NUMBER, RELEASE LOCATION, SITE IDENTIFICATION NUMBER AND OTHER IDENTIFYING NUMBERS, COUNTY, TOWNSHIP, TIER/RANGE/SECTION.

RELEASE DATA. Complete all applicable categories. Check all the boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary.

Form with fields: DATE & TIME OF RELEASE, DATE & TIME OF DISCOVERY, DURATION OF RELEASE, TYPE OF INCIDENT, MATERIAL RELEASED, CAS NUMBER or HAZARDOUS WASTE CODE, ESTIMATED QUANTITY RELEASED, PHYSICAL STATE RELEASED.

Form with fields: FACTORS CONTRIBUTING TO RELEASE, SOURCE OF LOSS.

Form with fields: TYPE OF MATERIAL RELEASED, MATERIAL LISTED ON or DEFINED BY, IMMEDIATE ACTIONS TAKEN.

Form with field: RELEASE REACHED, including checkboxes for Surface waters, Drain connected to sanitary sewer, Drain connected to storm sewer, Groundwater, Soils, Ambient Air, Spill contained on impervious surface.

EXTENT OF INJURIES, IF ANY 	WAS ANYONE HOSPITALIZED? <input type="checkbox"/> Yes NUMBER _____ HOSPITALIZED: _____ <input type="checkbox"/> No	TOTAL NUMBER OF INJURIES TREATED ON-SITE: _____
--	---	---

DESCRIBE THE INCIDENT, THE TYPE OF EQUIPMENT INVOLVED IN THE RELEASE, HOW THE VOLUME OF LOSS WAS DETERMINED, ALONG WITH ANY RESULTING ENVIRONMENTAL DAMAGE CAUSED BY THE RELEASE. IDENTIFY WHO IMMEDIATELY RESPONDED TO THE INCIDENT (own employees or contractor — include cleanup company name, contact person, and telephone number). ALSO IDENTIFY WHO DID FURTHER CLEANUP ACTIVITIES, IF PERFORMED OR KNOWN WHEN REPORT SUBMITTED

CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

ESTIMATED QUANTITY OF ANY RECOVERED MATERIALS AND A DESCRIPTION OF HOW THOSE MATERIALS WERE MANAGED (include disposal method if applicable)

CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

ASSESSMENT OF ACTUAL OR POTENTIAL HAZARDS TO HUMAN HEALTH (include known acute or immediate and chronic or delayed effects, and where appropriate, advice regarding medical attention necessary for exposed individuals.)

CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFIED:

INITIAL CONTACT BY: Telephone Fax Email Other

DATE/TIME INITIAL CONTACT: _____

PEAS: 800-292-4706 Log Number Assigned _____

<input type="checkbox"/> DEQ District or Field Office	Divisions or Offices Contacted:
<input type="checkbox"/> Baraga	<input type="checkbox"/> Air Quality
<input type="checkbox"/> Bay City	<input type="checkbox"/> Land & Water Management
<input type="checkbox"/> Cadillac	<input type="checkbox"/> Office Geological Survey
<input type="checkbox"/> Crystal Falls	<input type="checkbox"/> Remediation and Redevelopment
<input type="checkbox"/> Detroit	<input type="checkbox"/> Waste and Hazardous Materials
<input type="checkbox"/> Gaylord	<input type="checkbox"/> Water Bureau
<input type="checkbox"/> Grand Rapids	
<input type="checkbox"/> Wyoming	

DEQ Office locations are subject to change

NAME AND TITLE OF PERSON MAKING INITIAL REPORT:

DEQ STAFF CONTACTED & PHONE NUMBER:

OTHER ENTITIES NOTIFIED:

	Date:	Time:
<input type="checkbox"/> National Response Center (NRC): 800-424-8802	_____	_____
<input type="checkbox"/> US Coast Guard Office:	_____	_____
<input type="checkbox"/> Detroit <input type="checkbox"/> Grand Haven <input type="checkbox"/> Sault Ste. Marie		
<input type="checkbox"/> US Department of Transportation	_____	_____
<input type="checkbox"/> US Environmental Protection Agency	_____	_____
<input type="checkbox"/> 911 (or primary public safety answering point)	_____	_____
<input type="checkbox"/> Local Fire Department	_____	_____
<input type="checkbox"/> Local Police and/or State Police	_____	_____
<input type="checkbox"/> Local Emergency Planning Committee	_____	_____
<input type="checkbox"/> State Emergency Response Commission via MI SARA Title III Program	_____	_____
<input type="checkbox"/> Wastewater Treatment Plant Authority	_____	_____
<input type="checkbox"/> Hazmat Team	_____	_____
<input type="checkbox"/> Local Health Department	_____	_____
<input type="checkbox"/> Department of Labor & Economic Growth MIOSHA	_____	_____
<input type="checkbox"/> Department of Labor & Economic Growth Fire Safety	_____	_____
<input type="checkbox"/> Michigan Department of Agriculture: 800-405-0101	_____	_____
<input type="checkbox"/> Other _____	_____	_____

PERSON CONTACTED & PHONE NUMBER:

DATE WRITTEN REPORT SUBMITTED	SIGNATURE OF PERSON SUBMITTING WRITTEN REPORT
-------------------------------	---

