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-furbished 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
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Site Map
Significant Materials Inventory
Current Certificate of Coverage
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Routine and Comprehensive Inspection Log ....................... Form 1
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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.

<table>
<thead>
<tr>
<th>DATE</th>
<th>MATERIAL</th>
<th>VOLUME</th>
<th>LOCATION</th>
<th>ACTIONS TAKEN</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/18/16</td>
<td>None to date</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.)

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

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

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.

<table>
<thead>
<tr>
<th>Area of concern</th>
<th>Control Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aggregate storage area</td>
<td>Concrete bins / grading (if possible)</td>
</tr>
</tbody>
</table>
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 layoff. The plant manager/CSWO is responsible for recording employee training events in the SWPPP.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Employee Included</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spill response (PIPP)</td>
<td>All</td>
<td>Annual (spring)</td>
</tr>
<tr>
<td>Awareness of Significant Materials and proper storage</td>
<td>All</td>
<td>Annual (spring)</td>
</tr>
<tr>
<td>Safety and housekeeping</td>
<td>All</td>
<td>Weekly (tailgate)</td>
</tr>
<tr>
<td>Safety and housekeeping</td>
<td>Truck drivers, Loader operators</td>
<td>As needed</td>
</tr>
<tr>
<td>House keeping (building)</td>
<td>Facility workers</td>
<td>As needed</td>
</tr>
</tbody>
</table>

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 contaminates. The following preventative measures are implemented at this facility:

<table>
<thead>
<tr>
<th>Area</th>
<th>Material</th>
<th>Control Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck wash out</td>
<td>Heavy metals</td>
<td>Recycle wash lagoon</td>
</tr>
<tr>
<td>Raw material storage</td>
<td>Aggregate</td>
<td>Concrete bins</td>
</tr>
</tbody>
</table>

Diversions
Diversions 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.

<table>
<thead>
<tr>
<th>Area</th>
<th>Material</th>
<th>Control Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Raw material storage</td>
<td>Aggregate</td>
<td>Grading when necessary</td>
</tr>
<tr>
<td>Fuel area</td>
<td>Diesel fuel</td>
<td>Sand: block ditch</td>
</tr>
</tbody>
</table>
**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:

<table>
<thead>
<tr>
<th>Area</th>
<th>Material</th>
<th>Control Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuel Tanks</td>
<td>diesel and unleaded fuel</td>
<td>Dual walled tanks</td>
</tr>
<tr>
<td>Washout pit</td>
<td>Concrete washout</td>
<td>Lagoon containment</td>
</tr>
</tbody>
</table>

**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:

<table>
<thead>
<tr>
<th>Area</th>
<th>Material</th>
<th>Control Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuel Tanks</td>
<td>Fuel</td>
<td>Security: Pump is locked during off-hours</td>
</tr>
<tr>
<td>Entrance</td>
<td>All</td>
<td>Lock entrance gate</td>
</tr>
<tr>
<td>Floor Drain</td>
<td></td>
<td>Plugged with Conc. In 2011</td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>Date</th>
<th>Outfall</th>
<th>Method</th>
<th>Evaluator</th>
<th>Observations</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/26/11</td>
<td></td>
<td></td>
<td></td>
<td>None currently</td>
<td></td>
</tr>
</tbody>
</table>

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
Appendix A

SITE MAP

&

LIST OF SIGNIFICANT MATERIALS
Appendix B

RECORD KEEPING FORMS
EMPLOYEE TRAINING RECORD

Date of Session: ___________________________ Time: ___________________________

Trainer: ___________________________ Signature

Attendees (names, printed):

________________________________________
________________________________________
________________________________________
________________________________________
________________________________________
________________________________________
________________________________________
________________________________________

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
PREVENTIVE MAINTENANCE RECORD

Date: __________________________ Time: __________________________

Equipment number __________________

Service Location __________________

Explain what was done__________________________________________

______________________________________________________________

______________________________________________________________

______________________________________________________________

______________________________________________________________

______________________________________________________________

Inspected by (printed): _________________________________________

Signature: _________________________________________
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 COORDINATER
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 ASSESSMENT 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.
Daily walk through inspection
Loss of material from last day
Wetness around base of container
Odor above normal expectations

Possible spill or leak
More thorough inspection of area to determine if a spill has occurred

No sign of leakage
Continue with work as usual

What material is leaking?
How fast is it leaking?
Do I need help?

Hazardous
Evacuate area
Contact spill coordinator
Wear appropriate protective equipment
Take action to stop leak if possible
Dike area well ahead of spillage
Contact appropriate authorities
Send spill report to state if

Non-Hazardous
Contact spill coordinator
Wear appropriate protective equipment
Take action to stop leak
Dike area well ahead of spillage
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

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

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: ____________

PIPP 9
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.

<table>
<thead>
<tr>
<th>NAME AND TITLE OF PERSON SUBMITTING WRITTEN REPORT</th>
<th>TELEPHONE NUMBER (provide area code)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NAME OF BUSINESS</th>
<th>RELEASE LOCATION (provide address if different than business, if known, and give directions to the spill location. Include nearest highway, town, road intersection, etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>STREET ADDRESS</th>
<th>CITY</th>
<th>STATE</th>
<th>ZIP CODE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>BUSINESS TELEPHONE NUMBER (provide area code)</th>
<th>COUNTY</th>
<th>TOWNSHIP</th>
<th>TIER/RANGE/SECTION (if known)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>SITE IDENTIFICATION NUMBER AND OTHER IDENTIFYING NUMBERS (if applicable)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**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.

<table>
<thead>
<tr>
<th>DATE &amp; TIME OF RELEASE (if known)</th>
<th>DATE &amp; TIME OF DISCOVERY</th>
<th>DURATION OF RELEASE (if known)</th>
<th>TYPE OF INCIDENT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Explosion</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Fire</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Leaking container</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Vehicle accident</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Loading/unloading</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>MATERIAL RELEASED (Chemical or trade name)</th>
<th>CAS NUMBER or HAZARDOUS WASTE CODE</th>
<th>ESTIMATED QUANTITY RELEASED</th>
<th>PHYSICAL STATE RELEASED</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FACTORS CONTRIBUTING TO RELEASE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment failure</td>
</tr>
<tr>
<td>Training deficiencies</td>
</tr>
<tr>
<td>Operator error</td>
</tr>
<tr>
<td>Faulty process design</td>
</tr>
<tr>
<td>Unusual weather conditions</td>
</tr>
<tr>
<td>Other</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SOURCE OF LOSS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Container</td>
</tr>
<tr>
<td>Ship</td>
</tr>
<tr>
<td>Truck</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TYPE OF MATERIAL RELEASED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural: manure, pesticide, fertilizer</td>
</tr>
<tr>
<td>Chemicals</td>
</tr>
<tr>
<td>Flammable or combustible liquid</td>
</tr>
<tr>
<td>Hazardous waste</td>
</tr>
<tr>
<td>Liquid industrial waste</td>
</tr>
<tr>
<td>Oil/petroleum products or waste</td>
</tr>
<tr>
<td>Salt</td>
</tr>
<tr>
<td>Sewage</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td>Unknown</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>MATERIAL LISTED on or DEFINED BY</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAA Section 112(r) list (40 CFR Part 68)</td>
</tr>
<tr>
<td>CERCLA Table 302.4 (40 CFR Part 302)</td>
</tr>
<tr>
<td>EPCRA Extremely Hazardous Substance (40 CFR Part 355)</td>
</tr>
<tr>
<td>Michigan Critical Materials Register or permit</td>
</tr>
<tr>
<td>NREPA Part 31, Part 5 Rules polluting material</td>
</tr>
<tr>
<td>NREPA Part 111 or RCRA hazardous waste</td>
</tr>
<tr>
<td>NREPA Part 121 liquid industrial waste</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>IMMEDIATE ACTIONS TAKEN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Containment</td>
</tr>
<tr>
<td>Dilution</td>
</tr>
<tr>
<td>Evacuation</td>
</tr>
<tr>
<td>Hazard removal</td>
</tr>
<tr>
<td>Neutralization</td>
</tr>
<tr>
<td>System shut down</td>
</tr>
<tr>
<td>Other</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>RELEASE REACHED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface waters (include name of river, lake, drain involved)</td>
</tr>
<tr>
<td>Drain connected to sanitary sewer (include name of wastewater treatment plant and/or street drain, if known)</td>
</tr>
<tr>
<td>Drain connected to storm sewer (include name of drain or water body it discharges into, if known)</td>
</tr>
<tr>
<td>Groundwater (indicate if it is a known or suspected drinking water source and include name of aquifer, if known)</td>
</tr>
<tr>
<td>Soils (include type e.g. clay, sand, loam, etc.)</td>
</tr>
<tr>
<td>Ambient Air</td>
</tr>
<tr>
<td>Spill contained on impervious surface</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Distance from spill location to surface water, in feet</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

**EXTENT OF INJURIES, IF ANY**

<table>
<thead>
<tr>
<th>WAS ANYONE HOSPITALIZED?</th>
<th>TOTAL NUMBER OF INJURIES TREATED ON-SITE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Yes</td>
<td>NUMBER HOSPITALIZED:</td>
</tr>
<tr>
<td>□ No</td>
<td></td>
</tr>
</tbody>
</table>

**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:**

<table>
<thead>
<tr>
<th>Date:</th>
<th>Time:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone</td>
<td>Fax</td>
</tr>
<tr>
<td>PEAS: 800-292-4706</td>
<td>Log Number Assigned</td>
</tr>
<tr>
<td>Baraga</td>
<td>Gwinn</td>
</tr>
<tr>
<td>Bay City</td>
<td>Jackson</td>
</tr>
<tr>
<td>Cadillac</td>
<td>Kalamazoo</td>
</tr>
<tr>
<td>Crystal Falls</td>
<td>Lansing</td>
</tr>
<tr>
<td>Detroit</td>
<td>Newberry</td>
</tr>
<tr>
<td>Gaylord</td>
<td>Warren</td>
</tr>
<tr>
<td>Grand Rapids</td>
<td>Wyoming Materials</td>
</tr>
</tbody>
</table>

DEQ Office locations are subject to change

| Water Bureau |

**NAME AND TITLE OF PERSON MAKING INITIAL REPORT:**

**DEQ STAFF CONTACTED & PHONE NUMBER:**

**PERSON CONTACTED & PHONE NUMBER:**

**DATE WRITTEN REPORT SUBMITTED**

**SIGNATURE OF PERSON SUBMITTING WRITTEN REPORT**