

# **STORMWATER POLLUTION PREVENTION PLAN**

**Drew Foam Companies, Inc.**  
1093 Highway 278 East  
Monticello, Arkansas 71655

July 2011

Prepared by:



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For

**Drew Foam Companies, Inc.**  
**1093 Highway 278 East**  
**Monticello, Arkansas 71655**

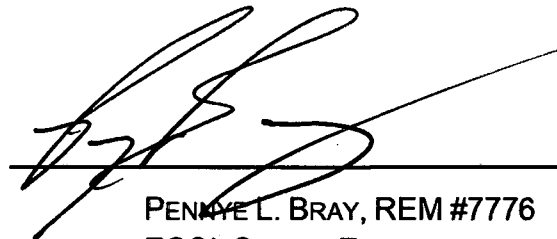
July 2011

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**CERTIFICATION OF PLAN**

This Stormwater Pollution Prevention Plan (SWPPP) has been prepared in accordance with the terms and conditions of General Permit No. ARR000000 for stormwater discharges associated with industrial activity. The Arkansas Department of Environmental Quality (ADEQ) issued said permit on May 1, 2004 under the federally delegated authority of the National Pollutant Discharge Elimination System (NPDES) program. The permit expired at midnight on March 31, 2009. The Arkansas Department of Environmental Quality revised and reissued said permit June 30, 2009. Due to a permit appeal the effective date of the permit was delayed. The appeal was formally dropped on August 27, 2010. The permit effective date remained July 1, 2009 but a revised schedule of compliance was established to allow permittees time to comply with the NOI and SWPPP requirements.

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

By:



Susan McClendon, Chief Financial Officer  
Drew Foam Companies, Inc.  
Monticello, Arkansas

Date: 8-1-11

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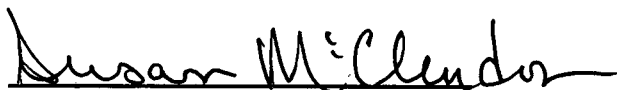


**CERTIFICATION OF NON-STORMWATER DISCHARGES**

As a duly authorized representative of Drew Foam Companies, Inc. (Drew Foam), I certify that the Drew Foam facility in Monticello, Arkansas has been evaluated for the presence of non-stormwater discharges. All such discharges at the facility are in compliance with Part 4.6.7 [Authorized Non-Stormwater Discharges] of General Permit No. ARR000000. This certification is made in accordance with Parts 4.6.7 and 6.10 of the permit.

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

By:



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Drew Foam Companies, Inc.  
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**STORMWATER POLLUTION PREVENTION PLAN**  
**DREW FOAM COMPANIES, INC.**  
**MONTICELLO, ARKANSAS**

**1.0 INTRODUCTION AND REGULATORY BACKGROUND**

This Stormwater Pollution Prevention Plan (SWPPP) addresses the Drew Foam Companies, Inc. (Drew Foam) facility located at 1093 Highway 278 East in Monticello, Arkansas. The facility is engaged in the manufacturing of expanded poly styrene (EPS) foam products. The industrial facility is located in a 454,000 square foot building located on 84.1 acres of property within the southeast portion of the State of Arkansas.

Operations at the facility are classified as Standard Industrial Classification (SIC) Code 3086 (Plastics Foam Products (polystyrene foam products)). Industrial activities within this SIC Code are classified within Industrial Sector Y2-Miscellaneous Plastics Products of the Industrial General Stormwater Permit (IGP).

This Plan has been developed in accordance with the requirements of National Pollutant Discharge Elimination System (NPDES) General Permit No. ARR000000 for stormwater discharges associated with industrial activity. A discussion of the regulatory requirements for stormwater discharges and their applicability to the Drew Foam facility is provided in the following paragraphs.

The federal Clean Water Act (CWA) of 1972 requires that the discharge of any pollutant to waters of the United States from any point source must be in compliance with an NPDES permit. In 1987, the CWA was amended to include Section 402(p), which required the Environmental Protection Agency (EPA) to promulgate regulations setting forth NPDES permit requirements for stormwater discharges associated with industrial activities. In fulfillment of this mandate, the EPA published a final rule on November 16, 1990, which established the stormwater provisions. In general, the federal regulations provide facilities with three possible types of permits for industrial stormwater discharges. These options are as follows: (1) individual permits, (2) group permits and (3) general permits.

Under the delegated authority of the EPA, ADEQ promulgated NPDES Industrial General Permit (IGP) No. ARR000000 for stormwater discharges associated with industrial activity. The most recent version of the permit became effective on July 1, 2009 and expires at midnight, June 30, 2014. Shortly after the permit became effective, an appeal was filed to the permit. The appeal resulted in the issuance of an automatic "stay" to the permit coverage. The appeal was formally dropped on August 27, 2010 and the effective date of July 1, 2009 reestablished. A modified compliance schedule was established to allow permittees the time needed to submit renewal NOIs and update their SWPPP's accordingly. The revision to the SWPPP contained herein has been developed to comply with the IGP.

IGP ARR000000 authorizes owners and operators of facilities located in the State of Arkansas to discharge stormwater associated with industrial activities to all receiving waters in accordance with the terms and conditions set forth in the permit. New permittees are required to submit their Notice of Intent to be covered under the IGP, a site drainage map and their SWPPP for the facility.

The primary industrial operations at the Drew Foam facility are properly categorized using SIC Code 3086 (Plastics Foam Products (polystyrene foam products)). This SIC Code is among those designated in the regulatory definition of "stormwater associated with industrial activity." Consequently, the Drew Foam facility is eligible for coverage for the outfalls that are composed entirely of stormwater, based on the eligibility requirements within the General Permit. The industrial activities at the facility are classified within the IGP as Industrial Sector Y2- Miscellaneous Plastics Products. A Notice of Intent has been submitted to ADEQ along with this Plan contained herein. No Tracking number has been assigned.

This SWPPP identifies the potential sources of pollution at the Drew Foam facility that may reasonably be expected to affect the quality of stormwater discharges from the site. It describes the implementation of practices for reducing pollutants in these stormwater discharges, and discusses the terms and conditions of the General Permit.

This SWPPP shall be amended as appropriate. Circumstances which might necessitate modification or revision of the Plan include the following: (1) whenever a change in design, construction, operation or maintenance of the facility occurs that has a

significant effect on the potential for the discharge of pollutants to waters of the State; (2) if the Plan proves to be ineffective in eliminating or significantly minimizing the release of pollutants from the sources identified in Section 5.0 (Description and Assessment of Potential Sources of Stormwater Pollution); and/or, (3) if the SWPPP is otherwise ineffective in achieving the general objective of controlling pollutants in the facility's stormwater discharges.

An EPA guidance document entitled "Stormwater Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices (BMPs)" (EPA 832-R-92-006 dated December 1992) was utilized during preparation of this SWPPP.

A copy of NPDES General Permit ARR000000 is included in Appendix A.

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## 2.0 DESCRIPTION OF SUBJECT FACILITY

This section of the SWPPP provides general information on the subject facility.

### 2.1 Site Location

The Drew Foam facility is located at 1093 Highway 278 East, Monticello, Drew County, Arkansas. Approximately 17 acres of the 84.1 total acres of the property site is currently used for the industrial activities. The remaining acreage is undeveloped. The facility legal address and approximate Latitude and Longitude are shown below.

A part of the NW  $\frac{1}{4}$  SE  $\frac{1}{4}$ , Section 25, Township 12 South, Range 7 West, Drew County, Arkansas

Latitude: 33° 37' 45.59" N Longitude: 91° 46' 08.91" W

The manufacturing facility consists of one large manufacturing building with all industrial activities taking place under roof. The 450,000 square foot, single-story building was originally constructed in 1963. The building is constructed of masonry on a concrete slab. One or more additions to the original structure were added during the life of the building. The main entrance is located on the south side of the building. Multiple loading docks are located on the north and west sides of the building. Two (2) overhead garage doors are located on the east side of the building. The interior of the production area of the building has concrete floors, concrete block walls, and steel I-beams. The roof is constructed with a recently installed vinyl covering.

There are multiple, open production areas within the plant, coupled with smaller areas for offices and support activities. The main production areas in the plant are noted as follows:

- Flat Cutting Area
- Eye Cutting Area
- Base Coat Area
- Grinding Area
- Molding Area
- Boiler Room (Gas)
- Log Warehouse
- Box Warehouse
- Shipping
- Storage

Drain trenches are located throughout the production areas of the building. Drew Foam does not use these trenches in their operations and has filled the outlets with concrete. The trenches were previously utilized by Burlington to convey excess water/dye solution that had dripped off the newly dyed rugs in the process areas to the lint filter system and ultimately to the city sewer.

Large paved parking areas for employee parking and shipping/receiving are located on the west and north sides of the building, respectively. The parking and driveways are of concrete and asphalt construction. A gravel area which was also previously used for parking is located to the east of the building. The south side of the building is used for visitor and managerial parking and entry drives on to the property.

A small brick pump house is located on the southeast corner of the property east of the plant driveway. The pump house is equipped with a diesel pump, lead-acid batteries and a 250 gallon aboveground fuel storage tank located inside. An empty out-of-service 300,000 gallon #6 heating oil aboveground storage tank for boiler fuel back up with earthen containment berm, an empty out-of-service 50,000 gallon diesel tank with earthen containment berm, and an out-of-service propane tank are also located on the southeast corner of the property. There is a smaller standard size propane tank and propane fill station for use by the plant's fork lifts located on the southeast corner of the building.

A concrete secondary containment area for a former 5,000 gallon diesel aboveground storage tank is located on the north side of the building adjacent the shipping area driveway. The containment structure is no longer in use.

A fenced area containing two (2) pad-mounted transformers is located at the southeast corner of the building, a new transformer is located on the east side of the building and an electrical "Lok Box" for switchgear is located on the south side of the building.

The wastewater treatment lint separation pit operated by the previous owner is located outside the eastern side of the building. The pit has had all rug lint filtering equipment removed and is now equipped with stainless steel screens to prevent any fugitive foam beads from being discharged. A large number of roof drains located in the

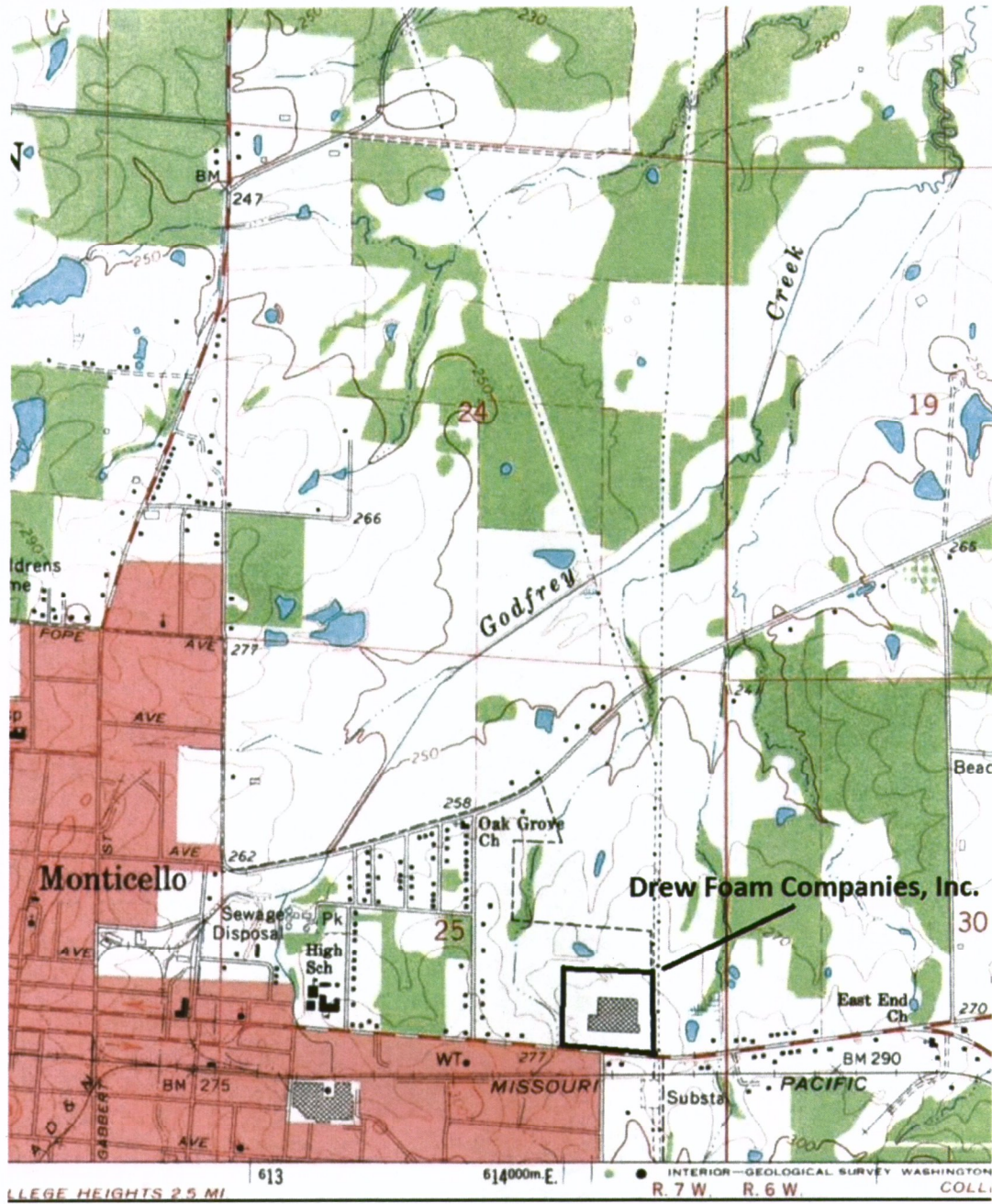


interior portions of the roof drain through to a subfloor collection system and out to the lint pit before discharge at Outfall 003. As previously stated, the floor drains to this

A small shed containing sand for use during icy weather is located on the northern portion of the property near the shipping docks. It does not appear to be utilized. The remaining portion of the northern side of the lot is used for parking and loading at the plant loading docks.

The Site Location and surrounding topography are shown on the U.S. Geological Survey (USGS) topographic map, Monticello North quadrangle in Figure 2.1.

Figure 2.1 - Site Topographic Map



Boundaries Not To Scale

7.5 Minute USGS Topographic Map  
Monticello North, Arkansas Quadrangle  
Source: USGS Store

## 2.2 Description of Operations

The Drew Foam facility began operations at the facility in late 2006. The property was previously owned by Yanoor Corporation d.b.a. Burlington Rugs – Plant 1 and prior to that, the facility was owned by Burlington Industries. The subject property consists of a 454,000 square foot building, an associated parking area, and a small pump house all situated on 84.1 acres. Drew Foam is using the facility for its full production, fabrication and shipping operations. Within the building, a separate business leases space for their operations. TCP Reliable manufactures box liners for medical shipments. No part of the TCP Reliable operation is conducted outdoors.

The main entrances onto the property are located off of Hwy 278 on the south side of the property. Parking areas are located on the north and west sides of the property. A chain link fence surrounds the north, east and south sides of the property. The road which runs along the perimeter of the building is used by shipping vehicles. A small out-of-service pump house is located on the southeast corner of the property. A 300,000 gallon tank, a 50,000 gallon tank and a propane tank are also located on the southeast corner of the property. These tanks are out of service and not utilized by Drew Foam. A small propane tank and propane fill station for fork lifts is located near the southeast corner of the building. A small structure containing sand is located on the northern boundary of the property, also not utilized by Drew Foam.

Industrial operations at the facility take place 24 hours daily 6 days a week with overtime hours as production demands. The facility manufacturing processes are described as follows:

Virgin polystyrene beads are delivered by truck at the bead storage area. Drew Foam receives both high and low pentane content beads. The high pentane content beads are processed 75% of the time while the low pentane beads are used the remainder of the time. The stored polystyrene beads are dumped from the shipping container into a transfer hopper and augured into the expander. Low-pressure steam is used to expand the beads to a desired density before they are dried with ambient air in a fluidized bed. The dried beads are routed from the bed dryer to storage bags through a transfer piping system. The beads are cured in the storage bags for up to three days.

The transfer piping system is used to convey the expanded polystyrene beads from the storage bags to the mold. Low-pressure steam is used to fuse the beads into a 37" x 50" x 288" or a 39" x 49" x 195" billet. The billets are transferred from the mold to the billet drying/storage area. In this area the billets are dried by ambient air. The billets are typically dried for three to seven days prior to processing.

The dried billets are moved from the storage area to various cutting machinery, which consists of high resistance electrical wires and band saws. A cyclone bagging system is located outside the building to collect dust from the band saws. The machinery sizes the product to fulfill customer specifications.

Approximately ten percent of this product is taken to the base coat department where a mesh backer is glued onto the substrate and then a stucco-type finish is applied to the foam for use in commercial building applications. A base coat drying chamber is then used to dry the product. Excess base coat material is washed from the area and discharges to a large open concrete containment area just outside the building. The base coat drying containment is constructed of concrete floor and block walls approximately two (2) feet high on three sides. An earthen berm is located on the fourth side to allow for removal and replacement to access the dried base coat material. The base coat material is allowed to dry and is then removed via a bobcat to truck for off-site disposal. The containment is adequately sized to account for the base coat wash water and any precipitation that falls into the containment.

Approximately fifteen percent of the cut foam goes through the laminating department, where a protective material is laminated to one or both sides of the foam. Billets that do not meet customer demands, scrap billet pieces generated from processing activities and expanded beads collected during housekeeping activities around the facility are sent to a grinder for recycling within the process. The grinder cuts the off-specification material and scrap into small pieces (i.e., regrind material) for recovery and reuse. The regrind material is conveyed through the transfer piping system to a bag storage area and then reintroduced into the process.

### 3.0 FACILITY DRAINAGE/SITE MAP

Stormwater is discharged from the industrial site in four areas. Stormwater outfalls are located on the north side of the developed property and at both the southeast and southwest corners of the property. Drainage from the southwest quadrant of the property generally flows either via sheet flow through a grassy area or via storm drains to the unnamed creek on the western property boundary. Drainage from the southeast quadrant of the property generally flows either via sheet flow through a grassy area or via storm drains to a low area immediately east of the property boundary and then to an unnamed creek east of the property boundary. Drainage from the northeast quadrant of the property drains from the former lint trap and the northeast corner of the building and then generally flows via sheet flow through a grassy swale at the northeast property boundary and then to an unnamed creek east of the property boundary. Drainage from the northwest quadrant of the property drains from the northwest corner of the plant building and then generally flows via sheet flow to a ditch that discharges at the northwest property boundary and then to an unnamed creek west of the property boundary. The unnamed creeks east and west of the property boundaries generally drain to the north to discharge into Godfrey Creek, which flows to the northeast to Lower Cutoff Creek, thence east to Cutoff Creek, thence south through Seven Devils Lake, thence south to Bayou Bartholomew and ultimately to the south and southwest to the Ouachita River near Bastrop, Louisiana.

More specifically, the four drainage areas are as follows:

#### **Southwest Quadrant**

Drainage of the southwest quadrant of the property includes roof drains from the southwest area of the building roof, a loading dock at the southwest corner of the building used to support the tenant leasing space in that portion of the building, an out-of-service air chiller storage tank, the office air conditioning units, the front paved visitor and office parking area and facility entrance drives, and the western area of the front and southwest maintained lawn. All but a small portion of the lawn areas flows to storm drains and to a piped outfall (Outfall 001) that discharges to the unnamed creek within a wooded parcel at the southwest corner of the property. A small portion of the lawn area

on the southwest side of the property discharges via sheet flow at the tree line at the property boundary and then to the unnamed creek on the west side of the facility. This small lawn area does not contain run-off from industrial activity.

### **Northwest Quadrant**

Drainage of the northwest quadrant of the property includes roof drains from the northwest area of the building roof, the west and north side paved parking area and facility drives, the materials receiving loading docks, the solid waste dumpster storage area, and a large expanse of west and northwest side lawn. All this area drains to a vegetated swale on the Drew Foam property that discharges on the north property boundary at the tree line (Outfall 002) and ultimately reaches the unnamed creek on the west side of the property.

### **Northeast Quadrant**

Drainage of the northeast quadrant of the property includes roof drains from the northeast area of the building roof, the east and north side paved and graveled parking areas and facility drives, a former aboveground storage tank containment structure that once held a diesel tank, a small concrete containment structure for holding sand for use on facility drives during winter precipitation events, the former lint filter discharge pit, a grated sanitary sewer pit (north central property boundary) and a large expanse of east and northeast side lawn. All this area drains to a vegetated swale on the Drew Foam property that discharges on the north property boundary at the east tree line (Outfall 003) and ultimately reaches the unnamed creek on the east side of the property.

The lint filter pit formerly collected wastewater generated within the former rug manufacturing plant for treatment prior to discharge to the City of Monticello sanitary sewer system (at the sanitary sewer discharge pit at the northeast-central portion of the property). The lint filter screens and equipment have been removed. The lint filter pit now only collects stormwater from roof drains located in the interior portion of the building roof through a subfloor drainage system, steam trap water from the facility boiler and steam system, and water from a loading dock on the eastern side of the building. Stainless steel screens have been installed to eliminate loose expanded

polystyrene beads from escaping to the surface discharge that may enter from the boiler room through one trench/floor drain that carries the steam trap water to discharge.

### Southeast Quadrant

Drainage of the southeast quadrant of the property includes roof drains from the southeast area of the building roof, the east and south side paved parking area and facility drives, the propane fuel forklift filling station, a former water chiller, an out-of-service 300,000 gallon boiler fuel aboveground storage tank in earthen containment berm, an out-of-service 50,000 gallon diesel aboveground storage tank to supply the facility's firefighting system, an out-of-service brick pump house that contains the firefighting water pump, and a large expanse of west and northwest side lawn. All this area drains via sheet flow across a large area of the southeast portion of the facility boundary at the tree line (Outfall 004) to the low area immediately east of the property boundary and ultimately reaches the unnamed creek on the east side of the property.

Table 3.1 shows the outfalls, size of each drainage area and the runoff coefficients.

Table 3.1 - Storm Water Outfalls at the Drew Foam Facility

Outfall No.	Outfall Location	Monitoring Category	Runoff Coefficient	Drainage Area Onsite (Approximate Acres)
001	Southwest corner of industrial property	Y2	0.32	19.5
002	Northwest of industrial property.	Y2	0.35	36.4
003	Northeast of industrial property.	Y2	0.34	29.0
004	Southeast corner of industrial property.	Y2	0.20	1.6

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#### 4.0 POLLUTION PREVENTION TEAM

The Pollution Prevention Team (as required by the permit) consists of specific individuals within the facility organization who are responsible for developing the SWPPP and implementing, maintaining and revising the Plan as necessary. The Drew Foam Pollution Prevention Team (PPT) is comprised of the individuals listed below. The PPT team meets on a regular basis to discuss environmental topics specific to the facility including stormwater pollution prevention practices and measures.

<u>Name</u>	<u>Title</u>
Mike Ragland	Plant Manager
Russell Gay	Production Manager
Allan Chavis	Maintenance
Barbara Hayden	HR Manager

Allan Chavis, Maintenance is identified as the PPT Leader. Specifically, his duties within this position are as follows:

- Overall responsibility for the implementation of the SWPPP;
- Ensure implementation of BMPs;
- Coordinates with departmental managers and superintendents to ensure implementation of all aspects of the plan;
- Coordinates with onsite contractors to ensure their activities do not adversely impact the stormwater runoff;
- Schedule annual training associated with stormwater pollution prevention;
- Conduct Quarterly Site Inspections and Annual Comprehensive Site Compliance Evaluation;
- Oversee sampling activities and ensure reports are properly prepared and submitted;
- Coordinates with authorized signatory to ensure adequate resources are available for implementation of the Plan;
- Ensures that preventive maintenance is conducted on a routine schedule to all outdoor systems and mobile equipment; and
- Ensures that required repairs are completed on a timely basis;

Mr. Mike Ragland, Plant Manager has the following duties with respect to his role on the PPT:

- Liaison with parent company and regulatory agencies;
- Authorized signatory;
- Plan review and correctness and on-going plan development; and
- Oversight (quality assurance of inspections and reports).

Additional facility personnel may be called upon to assist in the implementation of the various pollution prevention programs at the facility.

## **5.0 DESCRIPTION AND ASSESSMENT OF POTENTIAL POLLUTANT SOURCES**

In accordance with the General Permit, the SWPPP includes the following description of potential sources of pollution which may reasonably be expected to add significant amounts of pollutants to the stormwater discharges from the site, or which may result in the discharge of pollutants during wet weather. In addition, the following sections include an assessment of the risks that these potential sources pose to stormwater quality. This evaluation is intended to help the permittee target the most important sources of contamination for corrective and/or preventive action.

### **5.1 Description of Industrial Activities**

The following narrative inventory of industrial activities identifies the areas/activities at the facility that are associated with industrial activities that may potentially represent sources of stormwater pollution. Specifically, the Section 4.6.5.1 of the permit requires that the SWPPP identify areas where loading and unloading of dry bulk materials or liquid materials takes place; outdoor storage or materials and/or products; outdoor manufacturing or processing; dust or particulate generating processes; fueling areas; maintenance and/or cleaning operations; roofs or other surfaces that could leach pollutants; and any on-site waste treatment units as described below.

#### **5.1.1 Loading/Unloading Activities**

Shipping and receiving activities take place via truck traffic at the loading docks on the east side of the facility. Materials are delivered directly into the facility or are loaded directly onto outbound trucks.

#### **Chemical/General Materials Receiving**

The primary raw material at the facility is virgin polystyrene beads. The virgin beads are received at the Drew Foam facility at the loading docks at the rear (north side) of the facility. The beads arrive in super sacks and are delivered directly into the facility. Other liquid and packaged chemicals or products, e.g.

base coat stucco materials, are also received at the loading docks and are stored inside with no exposure to storm water.

Hydraulic and lubricating oils are received in 55-gallon drums and stored inside a designated area inside the building. Used oils are accumulated within 55-gallons drums and placed inside the oils storage area (inside the building) until transferred offsite for disposal or recycling.

### **Final Product Shipping**

Final product shipping takes place via truck. Loading of final product onto the truck trailers takes place at the loading dock with minimum exposure to stormwater.

### **5.1.2 Outdoor Storage of Materials**

#### **Base Coat Surfacing Drying Area**

Approximately ten percent of the foam product produced has a stucco-type finish applied to the foam for use in commercial building applications. Excess base coat material is washed with water from the inside base coating department area and discharges to a large open concrete containment area on the north side of the building. The base coat drying containment structure is constructed of concrete floor with the manufacturing building's wall, two concrete block walls approximately two (2) feet high and an earthen berm wall on the fourth side forming the walls of the structure. The earthen berm is 24' x 35' and is designed to allow access to the dried stucco base coat material. The rinse water/base coat material and any accumulated precipitation that falls into the containment is allowed to dry, the earthen berm removed to gain access and the dried base coat is then removed via a bobcat to truck for off-site disposal. The earthen berm is then replaced.

**Miscellaneous Materials Storage**

Miscellaneous materials such as wood waste, unused equipment and other miscellaneous scrap materials are stored inside the manufacturing building and are not exposed to stormwater. Some larger pieces of obsolete equipment from the previous operator of the facility (Burlington Rugs) are stored on the east side of the building pending removal for scrap metal recycling.

**5.1.3 Manufacturing and/or Processing Activities**

All of the manufacturing activities at the facility take place inside the manufacturing building.

**5.1.4 Dust Generating Processes**

Dust generation at the facility is minimal due to the drive and parking areas being primarily paved surfacing. One small area on the east side of the facility is used as a parking area by a few employees and this area is gravel surfaced.

**5.1.5 On-Site Waste Treatment/Solid Waste Management**

There is no treatment of stormwater on the site. Process wastewater generated from water washing of the base coating area is discharged to a containment structure located on the north side of the building. The stucco base coat/wash water and any accumulated precipitation that falls into the containment is allowed to dry in the containment and the dried stucco material is removed off-site for disposal.

Solid waste generated within the plant is collected within designated receptacles inside the building. The full receptacles are then emptied to a solid waste dumpster on the north side of the plant. The dumpster is an open-topped unit and the materials inside are exposed to stormwater.

Billets that do not meet customer demands, scrap billet pieces generated from processing activities and expanded beads collected during housekeeping activities around the facility are sent to a grinder for recycling within the process.

The grinder cuts the off-specification material and scrap into small pieces (i.e., regrind material) for recovery and reuse. The regrind material is conveyed through the transfer piping system to a bag storage area and then reintroduced into the process.

#### **5.1.6 Vehicle and Equipment Fueling, Maintenance and/or Cleaning**

As discussed previously, the facility has one small propane tank and fueling station located on the east side of the plant building. The propane tank is used for fueling of forklifts used at the facility. The propane tank and fueling station present no impacts to stormwater.

Maintenance activities for the forklifts and operational equipment takes place inside the building. No maintenance activities involving fluids takes place outdoors.

#### **5.1.7 Roofs or Other Surfaces Exposed to Facility Air Emissions**

The facility air emissions are properly permitted by the ADEQ and the facility operates all required emissions control equipment. As a result, it is not expected that significant amounts of air pollutants would be deposited on the facility roofs. However, a small amount of carryover loose expanded poly styrene beads are carried over through one of the current machine control devices and are deposited on the roof and ground surface on the east side of the building. This equipment is scheduled for removal and replacement during the summer of 2011. Upon replacement, it is anticipated that no beads will be released through the emissions control devices.

Currently, the small amount of loose EPS material that blows off of the roof from this area enters the surface run-off that is conveyed to the former lint trap (also located on the east side of the facility). The loose beads are captured in screens placed in the former lint trap to prevent their release in stormwater runoff from the facility. In addition, facility housekeeping requirement dictate that the area be routinely policed of all loose beads. All captured beads are either

returned to the process through the regrind machine or are shipped offsite for disposal if they are not in a condition that allows reuse.

#### **5.1.8 Roofs or Other Surfaces Composed of Materials That May Be Mobilized by Stormwater**

The facility roof surfaces are composed of a recently installed vinyl surface material on approximately 40% of the roof surface and built-up granulated asphalt roofing on the remaining 60%. The vinyl roofing is not a material that would be expected to leach pollutants into the stormwater runoff. Drew Foam intends to eventually replace the remaining built-up roofing material with vinyl surfacing. The building walls are composed of brick veneer and painted metal siding that would not be expected to leach pollutants into stormwater.

### **5.2 Inventory of Exposed Materials**

ECCI Senior Environmental Scientist, Jeff Haynes, conducted a site reconnaissance at the Drew Foam facility on October 14, 2010 to assess the potential sources of stormwater pollution and to evaluate the BMPs implemented at the facility. ECCI Senior Project Manager, Trip Gentry, conducted a follow-up site visit on March 30, 2011 to verify the status of improvements to BMPs made by Drew Foam.

In accordance with the regulatory requirements within Section 4.6.5.2 of the General Permit, the following inventory lists materials handled and stored at the site that are potentially exposed to stormwater.

#### **5.2.1 Raw Materials Receiving**

The primary raw material at the facility is virgin polystyrene beads. The virgin beads are received at the Drew Foam facility at the loading docks on the east side of the facility. The beads arrive in super sacks and are delivered directly into the facility. The building is equipped with large roll-up doors and the materials are typically received directly through those doors and transferred to storage areas. Exposure of the materials to stormwater is limited to the small area between the truck and the roll-up door. The materials are generally

received within closed super sacks. Consequently, there is little potential for the materials to be exposed to stormwater except in the event of a dropped or leaking super sack. The most significant potential source of stormwater pollutants associated with this activity is expected to be oil and fluid leaks associated with the delivery trucks.

### **5.2.2 Chemical/General Materials Receiving/Shipping**

Other liquid and packaged chemicals or products, e.g. base coat stucco materials, are also received at the loading docks and are stored inside with no exposure to storm water. Hydraulic and lubricating oils are received in 55-gallon drums and stored inside a designated area inside the building. Used oil generated from the facility maintenance activities is stored within 55 gallons drums inside the plant building. In general, there is no potential exposure of the used oil to stormwater except in the event of a spill occurring during transfers from the building during loading for offsite transfer.

As previously stated, the building is equipped with large roll-up doors and the materials are typically received directly through those doors and transferred to storage areas. Exposure of the materials to stormwater is limited to the small area between the truck and the roll-up door. The materials are generally received within closed, drums or totes. Consequently, there is little potential for the materials to be exposed to stormwater except in the event of a dropped or leaking container. The most significant potential source of stormwater pollutants associated with this activity is expected to be oil and fluid leaks associated with the delivery trucks.

### **5.2.3 Final Product Shipping**

Final product shipping takes place via truck. Loading of final product onto the truck trailers takes place at the loading dock on the north side of the building. The building is equipped with large roll-up doors and the materials are typically loaded directly through those doors onto the truck trailers. Exposure of the materials to stormwater is limited to the small area between the truck and the roll-up door. Consequently, there is little potential for the materials to be exposed to



stormwater except in the event of a dropped load. The most significant potential source of stormwater pollutants associated with this activity is expected to be oil and fluid leaks associated with the delivery trucks.

#### **5.2.4 Fueling Activities**

As discussed previously, the facility has one small propane tank and fueling station located on the east side of the plant building. The propane tank is used for fueling of forklifts used at the facility. The propane tank and fueling station present no potential impacts to stormwater. Maintenance activities for the forklifts and operational equipment takes place inside the building. No maintenance activities involving fluids takes place outdoors.

#### **5.2.5 Base Coat Surfacing Drying Area**

Excess base coat material is washed with water from the inside base coating department area and discharges to a large open concrete containment area on the north side of the building. The base coat drying containment structure is constructed of concrete floor with the manufacturing building's wall, two concrete block walls approximately two (2) feet high and an earthen berm wall on the fourth side forming the walls of the structure. The earthen berm is 24' x 35' and is designed to allow access to the dried stucco base coat material. The rinse water/base coat material and any accumulated precipitation that falls within the containment is allowed to dry, the earthen berm removed to gain access and the dried base coat is then removed via a bobcat to truck for off-site disposal. The earthen berm is then replaced.

The washed stucco material is a clay product that is allowed to air dry within the containment. The containment and its contents are exposed to stormwater. The design of the containment is sufficient to capture and prevent any precipitation from escaping the unit. However, the potential exists for the material that is spilled during removal and loading to be tracked or "dragged out" of the containment which could add suspended solids to the runoff from the area.

### **5.2.6 Manufacturing Processes**

All of the manufacturing activities at the facility take place inside the manufacturing building. Consequently, there is little potential for the materials to be exposed to stormwater.

### **5.2.7 Dust Generating Processes**

Dust generation at the facility is minimal due to the drive and parking areas being primarily paved surfacing. One small area on the east side of the facility is used as a parking area by a few employees and this area is gravel surfaced. However, the potential exists for dust to add suspended soils to the runoff from the area.

### **5.2.8 Miscellaneous Materials Storage**

Miscellaneous materials such as broken pallets, unused equipment, scrap pipe and other miscellaneous materials are staged outdoors on the east side of the building. The materials are not covered and are exposed to stormwater. In general, the materials are not expected to represent a significant stormwater concern as long as all fluids are drained from the unused equipment prior to outdoor staging.

### **5.2.9 Solid Waste Collection**

Solid waste generated within the plant is collected within designated receptacles inside the building. The full receptacles are then emptied to a solid waste dumpster on the north side of the plant. The dumpster is an open-topped unit and the materials inside are exposed to stormwater. However, the dumpsters are not used for liquid or chemical wastes and would not be expected to represent a significant stormwater concern.

Billets that do not meet customer demands, scrap billet pieces generated from processing activities and expanded beads collected during housekeeping activities around the facility are sent to a grinder for recycling within the process for recovery and reuse. The regrind material is conveyed through the transfer

pipng system to a bag storage area and then reintroduced into the process. The facility maintains an active housekeeping program and runoff collection system to recover as much loose EPS pieces and beads as possible for reuse. However, the potential exists for some loose material to escape the confines of the building, adding to suspended solids to runoff to all four outfalls.

#### **5.2.10 Facility Roof Surfaces Exposed to Air Emissions**

The facility air emissions are properly permitted by the ADEQ and the facility operates all required emissions control equipment. As a result, it is not expected that significant amounts of air pollutants would be deposited on the facility roofs. However, a small amount of carryover loose expanded poly styrene beads are carried over through one of the current machine control devices and are deposited on the roof and ground surface on the east side of the building. This equipment is scheduled for removal and replacement during the summer of 2011. Upon replacement, it is anticipated that no beads will be released through the emissions control devices.

Currently, the loose EPS material from this area enters the surface run-off that is conveyed to the former lint trap (also located on the east side of the facility). The facility maintains an active housekeeping program (both inside and outside the manufacturing building) and a runoff collection system to recover as much loose EPS pieces and beads as possible for reuse. The collection system captures the loose beads in screens placed in the former lint trap to prevent their release in stormwater runoff from the facility. However, the potential exists for some loose material to escape the confines of the building, contributing suspended solids to the runoff to Outfalls 003 and 004.

#### **5.2.11 Facility Roof Surfaces**

The facility buildings and roof surfaces are all composed of a recently installed vinyl surface material on approximately 40% of the roof surface and built-up granulated asphalt roofing on the remaining 60%. The vinyl roofing is not a material that would be expected to leach pollutants into the stormwater runoff.

Drew Foam intends to eventually replace the remaining built-up roofing material with vinyl surfacing. Therefore, the roof surfaces do not represent a significant stormwater concern.

### 5.3 Stormwater Treatment

No treatment of stormwater takes place at the Drew Foam facility.

### 5.4 Spills and Leaks

The IGP requires the inclusion of a list of significant spills and/or leaks of toxic and hazardous chemicals that have recently occurred in areas exposed to precipitation or that happened in areas that drain to a stormwater outfall. The spill log must cover the period from three years prior to the effective date of the permit to the present. The list of leaks and spills must be updated when appropriate throughout the five-year term of the IGP.

The Drew Foam facility has not recorded a "significant spill" during the period of time from the present date to when the facility began operations. For the purposes of this SWPPP, the term "significant spill" is defined as a release of a hazardous material in excess of its federally-designated Reportable Quantity (RQ).

As required by the permit, Drew Foam maintains a record of all significant incidents (spills, leaks, etc.) that may result in pollutants being discharged in stormwater runoff from the facility. A spill report completed for such an event, will include the following information: (1) a description of the incident; (2) the date and time it occurred; (3) the duration of the release; (4) the pollutant(s) involved; (5) the weather conditions during the incident; (6) an estimate of the quality and quantity of contaminated stormwater discharged; (7) the parties notified; (8) the cause(s) of the incident; and, (9) the recommended modifications to the BMP program, operating procedures and/or equipment needed to prevent a recurrence of the incident. Any spill report completed at the site record will be incorporated into the SWPPP and retained on-site.

In addition to the formal spill report, a summary of the spill or leak incident will be incorporated into this section of the Plan. An example of a spill reporting form is contained within Appendix C. If at any time in the future, a significant spill occurs at the

facility, that represents the potential to impact the stormwater drainage from the facility, the procedures described herein will be re-evaluated for effectiveness and if necessary modifications to the plans will be made. Recordkeeping and internal reporting procedures are discussed further in Section 8.4.

In the event that a significant or reportable quantity spill occurs during the five-year term of the General Permit, this section of the SWPPP will be updated appropriately in accordance with the permit requirements. At a minimum, a report will be incorporated herein which describes the following: (1) the cause(s) of the significant spill or leak; (2) the actions taken in response to this release; and, (3) the actions taken to prevent recurrence of a similar spill or leak in the future. The Measures and Controls identified within this Plan may also need to be modified and/or updated if any such spill or leak should occur during the term of the permit coverage.

### **5.5 Sampling Data**

The Drew Foam facility has not been previously covered under a stormwater permit. Consequently, no stormwater sampling has been conducted. As a result, no previous sampling data is available for stormwater runoff from industrial activities at the facility. The sampling and reporting requirements specific to the revised IGP are discussed further in Section 8.0 of this document.

### **5.6 Risk Identification and Summary of Potential Pollutant Sources**

Based upon industrial activities and the materials storage and handling practices observed during the site reconnaissance, the following sources are judged to have reasonable potential for contributing pollutants to the stormwater:

- Raw Materials Receiving;
- Chemical and General Materials Receiving and Shipping;
- Final Product Shipping;
- Base Coat Surface Drying Area;
- Solid Waste Collection;
- Facility Roofs Exposed to Air Emissions;

- Tracking/Drag Out from Building; and
- Leaks or spills of hydraulic and/or lubricating fluids from facility vehicles; equipment and tractor trailer trucks;

Table 5.1 shows the areas at facility with the greatest potential to contribute pollutants to the stormwater runoff from the facility, the predicted direction of flow, and the primary pollutant of concern.

**Table 5.1 - Potential Pollutant Sources and Affected Outfalls**

Potential Pollutant Source	Direction of Flow	Pollutant of Concern	Outfall Affected
Raw Materials Receiving	To drainage ditches and swale north to Outfall 002	Total Suspended Solids (TSS), Oil and Grease, trace metals	002
Chemical and General Materials Receiving and Shipping	To drainage ditches and swale north to Outfall 002	TSS, Oil and Grease, trace metals	002
Final Product Shipping	To drainage ditches and swale north to Outfall 002	TSS, Oil and Grease, trace metals	002
Base Coat Surface Drying Area	To drainage ditches and swale north to Outfall 002	TSS	002
Solid Waste Collection	To drainage ditches and north to lint trap screens and Outfall 003	TSS	003
Facility Roofs Exposed to Air Emissions	To drainage ditches and north to lint trap screens and Outfall 003	TSS	003
Tracking/Drag out from Building	To drainage ditches and swale north to Outfall 002 and Outfall 003	TSS	002 and 003

<b>Potential Pollutant Source</b>	<b>Direction of Flow</b>	<b>Pollutant of Concern</b>	<b>Outfall Affected</b>
Leaks or spills of hydraulic and/or lubricating fluids from facility vehicles; equipment and tractor trailer trucks	To drainage ditches and swale north to Outfall 002	TSS, Oil and Grease, trace metals	002

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## 6.0 MEASURES AND CONTROLS

This section provides a description of stormwater management controls appropriate for the facility and the implementation of such controls at the facility. The appropriateness and priorities of controls in the SWPPP were chosen to reflect the identified potential sources of pollutants at the facility. The selection, design, installation, and implementation of these control measures are in accordance with good engineering practices and the manufacturer's specifications. Most industrial facilities already have many of these measures in place for the purposes of accident and fire prevention, employee health and safety, loss prevention, or to comply with other environmental regulations. These control techniques are easily adapted to prevent stormwater pollution at any facility.

### 6.1 Best Management Practices (BMPs)

BMPs are practices used by the facility to eliminate or reduce the potential to contaminate stormwater. BMPs must also be considered to regulate peak flow and volume of stormwater discharge. In general, there are ten baseline BMPs as described by "Stormwater Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices" (EPA 832-R-92-006) and the General Stormwater Permit. The ten baseline BMPs are listed below:

- Minimizing exposure;
- Good housekeeping;
- Preventive maintenance;
- Spill prevention and response;
- Visual inspections;
- Employee training;
- Record Keeping and Reporting;
- Non-stormwater discharges;
- Sediment and erosion control; and
- Management of runoff.

The aforementioned BMPs are discussed in detail in the following sections. These stormwater management practices are in accordance with the baseline requirements of the IGP. Each stormwater management practice will be continued throughout the five-year term of the Permit. The effectiveness of these BMPs will be periodically monitored. The stormwater control measures described herein will be followed as long as they are effective in eliminating or reducing pollutant loadings in the facility's stormwater discharges. If these measures are not adequate, then additional BMPs will be evaluated and implemented as appropriate.

## **6.2 Minimizing Exposure/Implementation of Structural Controls**

Structural controls are physical features used to minimize exposure of certain areas or objects to stormwater. Such items can include roofs, enclosures, curbs, vegetative swales, ditches and culverts, sediment traps and any soil stabilization or erosion control practices. The Drew Foam facility utilizes a number of structural controls that are designed to minimize exposure to potential pollutants as well as facility procedures as described below:

- A portion of the eastern side of the plant site runoff is directed to the former lint trap that is equipped with screens to capture loose beads.
- Until the new mold machine is installed in summer 2011, booms will continue to be maintained around storm drains and outfalls on the east side of the plant to capture any loose EPS beads.
- Raw materials are received in the north end of the building, to the extent practicable.
- Receiving of chemicals and general materials takes place directly into the building.
- All areas of the facility that are accessed by truck traffic are covered with concrete, asphalt pavement or gravel to minimize the potential for erosion.
- Drummed oil storage takes place inside the buildings with no exposure to stormwater.
- Drainage ditches are used to channel the stormwater away from the facility areas.

### 6.3 Good Housekeeping Program

Good housekeeping requires that those areas of a particular facility that may contribute pollutants to stormwater discharges be maintained in a clean and orderly manner. The housekeeping program at the Drew Foam facility includes the following elements.

- Clean pavement and ground surfaces are maintained in the outside areas to the extent practicable.
- Spilled materials are swept up immediately.
- Trash and waste materials are placed in the proper receptacles; receptacles are emptied on a timely basis to prevent overflows;
- Used oil is stored inside;
- Indoor work areas are swept and maintained to prevent outside tracking of pollutants;
- Dry absorbents are used under leaking machinery and spent absorbents promptly removed;
- Workers are encouraged to act responsibly in keeping trash picked up in outside work areas;
- The facility drainage screens are maintained and collected beads removed promptly;
- An inventory of all chemical substances in the workplace is maintained and all containers are properly labeled to show the contents; and
- Discarded equipment/materials are drained of all fluids prior to be placed outdoors. Inspections are conducted routinely to monitor housekeeping.

Drew Foam encourages employee participation in the utilization of good housekeeping measures through periodic training and communication as discussed further this document.

### 6.4 Preventive Maintenance Program

Preventive maintenance (PM) involves the regular inspection and testing of facility equipment and operational systems. These inspections will help uncover conditions such as equipment wear, malfunctions and leaks. The equipment can then

be adjusted, repaired or replaced. If not addressed, the deficient items could cause breakdowns or failures that might result in releases of chemicals to the environment.

The preventive maintenance activities at the Drew Foam facility involve the inspection and maintenance of mobile equipment such as forklifts, trucks, and other facility service vehicles. All manufacturing equipment is inspected routinely and repairs are made as needed to prevent malfunctions that could lead to a release of pollutants. Oil and petroleum product storage drums are inspected on a routine basis following facility procedures. Repairs are conducted indoors (when possible) and completed as soon as practicable.

The PM practices required by this SWPPP have already been implemented as a key element of Drew Foam's existing housekeeping and maintenance programs. The current measures are believed to be adequate to minimize stormwater pollution at the facility. These practices will be continued throughout the five-year term of the IGP coverage. In the future, the existing PM program will be modified and/or revised whenever and wherever appropriate.

#### **6.5 Spill Prevention and Response Procedures**

The Drew Foam facility has designated employees that are prepared to respond properly to any spill of oil, fuel, chemical or other material used on the company premises. The main objective is to contain the spill and clean it up as quickly as possible and to prevent the spilled material from coming into contact with stormwater runoff.

Allan Chavis, Maintenance Manager is identified as the primary spill coordinator for the Drew Foam facility. In the event that he is unavailable, Russell Gay, Production Manager, will serve as his alternate. Drew Foam has simple, unwritten procedures for responding to small oil and liquid chemical spills, while general housekeeping activities are used to address loose EPS beads from escaping the building. Each area supervisor is responsible for spill prevention during daily operational activities in their specific work area. In general, small spills are absorbed with granular materials or socks and removed to a drum for offsite disposal.

The following procedures are to be followed for larger spills occurring at the facility. In general, if an oil or chemical release occurs that has the potential to impact stormwater runoff the following steps are to take place:

- Stop the flow of material, if it is safe to do so;
- The person first noticing the spill will immediately notify the spill coordinator who will coordinate the response;
- Identify the source, characteristics, amount, substance and risk factors in the spill or release;
- Take necessary steps to prevent the occurrence of fires or explosions;
- Create a dam in the closest drainage ditch to contain the material for cleanup;
- Use available dry absorbents, socks or pads to absorb the material and then transfer the soiled materials to a properly labeled drum (i.e. diesel contaminated soil") for offsite disposal;
- Drums containing materials from a spill cleanup are to be properly closed and staged in an area away from vehicular traffic until transferred offsite;
- If a spill enters one of the storm drains or drainage ditches, booms or absorbent towels are to be used to remove the liquid from the water surface;
- Notify proper government agencies, if the spill or release is above the threshold quantity of the material released; and
- Provide appropriate information and records for internal purposes and to regulatory agencies.

Spill incidents occurring at the facility are documented on a pollution incident report form (Appendix C).

Under no circumstances shall spill response involve the flushing of a spill to a storm drain or directing it offsite. In the event of a fire, fire response shall include damming stormwater conveyances, where feasible, in order to prevent runoff of potentially contaminated water. The trapped runoff water should be visually inspected and/or analyzed (if directed by ADEQ) prior to discharge to minimize any potential adverse impacts to surface water quality.

Any waste determined to be hazardous would be disposed of at a permitted off-site facility.

As determined by Drew Foam management, contractors (engineering consultant and/or emergency response firms) may be contacted to provide necessary technical environmental engineering support and to remediate spill sites.

#### **6.5.1 Reportable Quantities and Spill Reporting**

Arkansas Regulation Number 2 and 40 CFR 110.3 (oil) state that any discharge that violates an applicable water quality standard, or causes a sheen or emulsion is immediately reportable to respective agencies. Additionally, the Arkansas Department of Emergency Management (ADEM) has developed a guideline that recommends reporting a spill of 25 gallons or more of oil to the ground (no water contact). This is not a regulation but simply a guideline.

Detailed reporting is required for spills of oil in volumes greater than 1,000 gallons in a single discharge event or more than 42 gallons in each of two discharges within a 12-month period is required by 40 CFR 112.4. These detailed reports must be submitted to the EPA Regional Administrator within 60 days of the discharge event.

For reportable quantities of specific chemicals refer to a copy of the "List of Hazardous Substances and Reportable Quantities" from 40 CFR 302, which is all inclusive of the several regulated lists.

Reporting requirements apply not only to all of the substances individually listed in 40 CFR 302, but also to wastes or waste streams exhibiting the characteristics of ignitability, corrosivity, reactivity, or toxicity under the Resource conservation and Reclamation Act (RCRA). The release of a non-designated substance exhibiting any of these four RCRA characteristics is a release of a hazardous substance if the substance is a waste prior to release or becomes a waste after release. Under RCRA regulations, a substance becomes a waste after release if it is not cleaned up or if it is cleaned up only for eventual disposal.

Wastes or waste streams exhibiting the characteristics of ignitability, reactivity, or corrosivity have Reportable Quantities (RQs) of 100 pounds. The RQs of wastes or waste streams that exhibit the characteristic of toxicity have the RQs of the contaminant on which the toxicity characteristics are based.

The SWPPP will be modified within 14 days of the knowledge of a reportable quantity release to provide a description of the release, circumstances leading to the release, and the date of the release. In addition, the plan must review and identify measure to prevent the reoccurrence of such releases, and the plan must be modified where appropriate.

#### **6.5.2 Potential Spill Areas**

The following areas have been identified as potential spill areas:

- Shipping and Receiving Docks; and
- Base Coat Surface Drying Area.

#### **6.5.4 Spill Response Equipment**

Drew Foam will continually maintain an inventory of release response equipment to minimize the impact of any potential release. In general, spill control materials will include the following (or equivalent) materials.

- Rubber gloves;
- General absorbent pad (sock) or boom;
- Bags of oil dry or other granular absorbent;
- Spark proof shovel;
- Broom(s);
- Chemical goggles or safety glasses;
- Plastic-lined bags;
- Waterproof tape; and
- Empty 55-gallon drums.

In general, these materials are stored at centralized locations within the facility building and in the maintenance shop.

#### **6.6 Employee Training**

As required by the IGP, Drew Foam conducts periodic training of employees on stormwater-related topics. The purpose of the training program is to inform personnel at

all levels of responsibility of the components and goals of the Plan. When properly trained, personnel are more capable of preventing spills, responding safely and effectively to an accident when one occurs, and recognizing situations that could lead to stormwater contamination. The training program is to be designed to address each component of the SWPPP; including how and why tasks are implemented.

All permanent employees receive training on the following topics:

- Identifying potential spill areas and drainage routes;
- Location of spill control materials;
- Measures to contain spilled materials in spill area;
- Proper procedures for spill reporting (internal reporting);
- Material handling and storage requirements;
- General housekeeping measures;
- Used oil management;
- Proper fueling procedures;
- Used battery management;
- Outside materials management practices; and
- Procedures for minimizing potential exposure of various materials to stormwater.

Contractors working on the Drew Foam site are required to adhere to the BMPs and pollution prevention practices implemented onsite. The contractors are provided training as needed.

The Prevention Team Leader (Alan Chavis) has been designated as the person accountable for the SWPPP training program and will be responsible for the implementation of the necessary programs. Documentation of training (signature sheets) will be maintained in the facility records. Appendix G contains an example form that can be used to document training.

Members of the Stormwater Pollution Prevention Team meet as necessary to discuss major amendments or revisions to the plan or following significant incidents which affect stormwater discharges or the overall stormwater management program.



## 6.7 Sediment and Erosion Control

Owners and operators of industrial facilities are required to identify those areas of their facility with a "high potential for significant soil erosion" due to topography, industrial activities and/or other factors. The permittee must then identify and implement structural, vegetative and/or stabilization measures to be used to limit erosion in these areas.

There are no areas where erosion and sedimentation are prevalent on the site. The areas of the facility that are accessed by vehicular traffic are all provided with concrete and/or gravel. Lawn areas and drainage ditches are maintained with a healthy covering of grass. Vegetative areas are routinely inspected to assess the potential for erosion and corrective measures are implemented as needed.

## 6.8 Management of Runoff

As discussed above, the General Permit specifies a number of "baseline" BMPs that must be addressed in all SWPPPs (where appropriate). These BMPs are generally source control measures. Traditional stormwater management practices (i.e., measures other than those which control the sources of pollutants) may also be appropriate for certain facilities. Such practices are used to divert, infiltrate, reuse and/or otherwise manage stormwater runoff in a manner that reduces pollutants in the stormwater discharges from a particular site. These measures may include the following: containment dikes and curbing; vegetative swales; collection and reuse of stormwater; inlet controls, such as oil/water separators; infiltration devices; and, wet detention/retention basins.

As discussed in the previous sections, Drew Foam has already implemented a number of the baseline BMPs at the facility. The controls are primarily source reduction measures. They are intended to reduce or eliminate pollutants at the source, prior to their exposure to precipitation and/or stormwater runoff. Additionally, Drew Foam utilizes several structural measures for controlling stormwater runoff. These measures include open-channel drainage ditches and culverts to direct the flow of stormwater away from potential spill areas. Consequently, the BMPs currently in place at the facility are adequate to minimize stormwater contamination at the facility, to the extent

practicable. As a result, the use of additional stormwater management practices is not considered necessary for this SWPPP. The baseline BMPs will be continued throughout the five-year term of the General Permit coverage. In the future, these stormwater control measures will be modified and/or revised whenever and wherever appropriate. Additional BMPs will be implemented if necessary.

### **6.9 Identification of Non-Stormwater Discharges**

The IGP prohibits the release of non-stormwater discharges co-mingled with stormwater runoff (with certain limited exceptions). Examples of such prohibited discharges include the following: any water used directly in a manufacturing operation (i.e., process wastewater), non-contact cooling water, boiler blowdown, equipment, pavement or vehicle wash water using detergents, and, sanitary wastewater. Unless authorized by an appropriate General Stormwater Permit, such non-stormwater discharges are illegal and must be eliminated.

The following non-stormwater discharges are allowed provided that any such discharge is identified in the SWPPP and the facility has implemented appropriate, pollution prevention measures for the non-stormwater component(s) of the discharge; and, the facility complies with all other applicable provisions of the permit.

- Discharges from emergency firefighting activities;
- Flushing of fire hydrants;
- Potable water sources including flushing of waterlines;
- Irrigation drainage;
- Lawn watering;
- Routine external building wash downs where detergents or similar cleaning agents are not used;
- Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled materials have been removed) and where detergents are not used;
- Uncontaminated air conditioning or compressor, and other uncontaminated condensate resulting from the condensing of atmospheric moisture onto cool or cold surfaces (such as the discharge of thawed condensate from the surface of liquid nitrogen tanks stored outdoors) where no detergents or other cleaners are used;

- Air compressor condensate;
- Steam condensate;
- Incidental uncontaminated windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower (e.g., "piped" cooling tower blowdown or drains);
- Uncontaminated springs and ground water; Foundation or footing drains where flows are not contaminated with process materials such as solvents;
- Excavation dewatering (as long as turbidity is controlled); and
- Non-process water used for dust suppression on roads.

The following authorized non-stormwater discharges may occur at various times at the Drew Foam facility.

- Discharges from emergency firefighting activities;
- Non-stormwater discharge of lawn watering;
- Pavement and building wash waters without spills, leaks, or detergents;
- Air conditioning condensate;
- Air compressor condensate; and
- Steam condensate.

In accordance with the IGP, the SWPPP includes a certification that all stormwater outfalls have been tested or evaluated for the presence of non-stormwater discharges.

ECCI, Senior Environmental Scientist, Jeff Haynes, assessed the Drew Foam site for the presence of non-stormwater discharges on October 14, 2010. The method used to identify any non-stormwater discharges was direct visual observation. The entire site was examined for such discharges. ECCI Senior Project Manager, Trip Gentry, conducted a follow-up site visit on March 30, 2011 to verify the status of improvements to BMPs made by Drew Foam. Following implementation of further recommendations made by ECCI, the facility does not have non-stormwater discharges.

The current non-stormwater discharge certification for the facility is provided at the beginning of this SWPPP. The potential presence of non-stormwater discharges at

the site will be reviewed annually as a component of the Annual Comprehensive Site Compliance Evaluation.

## 7.0 EVALUATIONS AND INSPECTIONS

### 7.1 Visual Inspections

The IGP specifies that qualified facility personnel conduct routine inspections at a frequency that will allow for detection of conditions that could impact the quality of the stormwater runoff from the facility. These routine inspections are to be conducted in addition or as a part of the Annual Comprehensive Site Compliance Evaluation.

The areas for inspection and the frequency of the visual inspections depend on site-specific considerations. The areas reviewed are those locations that could potentially contribute pollutants to stormwater runoff. This information was developed when performing the source inventory and evaluation phase of SWPPP preparation. The frequency of the inspections has been determined by the types and amounts of materials handled at the facility, the existing BMPs for pollution prevention, and any other factors that may be relevant, such as the age of the facility.

It is important to note that the periodic visual inspections are not meant to be an all-inclusive assessment of the entire stormwater pollution prevention program. Rather, these visual inspections are meant to be a routine look-over of the facility in order to identify conditions that might result in the contamination of stormwater runoff from the site.

Visual inspections are conducted four (4) times annually (calendar quarters) by the PPT Leader or any alternate trained by the PPT Leader. **At least one quarterly inspection must be a wet weather inspection.** These inspections include all areas of the facility where industrial materials or activities are exposed to stormwater, all stormwater control measures used to comply with this permit, and the stormwater outfalls. The focus of these inspections will be housekeeping, preventive maintenance, and ensuring that all drainage control structures are operating properly. However, some attention will also be given to the liquid chemical containment systems and materials storage practices. The inspections will also evaluate the stormwater outfalls for potential pollutants that could lead to the presence of floating materials, visible sheen, discoloration, turbidity, odor, etc. on the surface of the receiving stream or runoff leaving the site. Any problems will be noted on the inspection checklist and addressed as necessary.

The visual inspections will be documented on the forms provided within Appendix D. The PPT leader will follow-up with the supervisor of any area where problems are noted and ensure that all deficiencies are corrected within a timely manner. These corrective actions and date of implementation will be noted on the inspection form and maintained in the facility stormwater records.

## **7.2 Annual Comprehensive Site Compliance Evaluation**

As per the IGP, an Annual Comprehensive Site Compliance Evaluation (ACSCE) is conducted annually. The inspection is conducted by The PPT team leader or someone who has received specific stormwater training and is familiar with the IGP and SWPPP.

The purpose of the inspection is to assess the overall effectiveness of the SWPPP in minimizing the release of pollutants in the stormwater discharges from the site, and to identify instances where modification and/or revision of the Plan are needed. In particular, the annual site evaluation will allow Drew Foam to do the following:

- (1) Confirm the accuracy of the description of potential pollution sources contained in the SWPPP;
- (2) Evaluate the effectiveness of the existing Best Management Practices in reducing pollutant loadings at the facility, and determine whether or not additional measures are needed; and
- (3) Assess the facility's compliance with the terms and conditions of the General Permit.

The inspection is to include all areas of the facility contributing to the stormwater discharge. The evaluation will include, but is not limited to, the following elements:

1. Visual evidence of, or the potential for, pollutants to enter the drainage system;

2. Evaluation of measures to reduce pollutant loadings to determine whether they are adequate and properly implemented in accordance with the terms of the permit and SWPPP;
3. Evaluation of whether additional control measures are needed;
4. Visual inspection and evaluation of structural stormwater management measures;
5. Evaluation of existing sediment and control measures, and other structural pollution;
6. Observation of other prevention measures identified in the plan shall be to ensure that they are properly maintained and operating correctly;
7. Evaluation of spill control materials.

The following areas are included in the Drew Foam site evaluation:

- Shipping and receiving dock;
- Forklift fueling area;
- Lint trap screens;
- East side parking area for windblown EPS beads;
- Base coat surface drying containment area;
- Miscellaneous materials storage area (east side of building);
- Used oil transfer routes;
- Outside perimeter of all the facility buildings;
- Drainage ditches, all storm drains and downspouts; and
- Outfall locations.

The description of potential pollutant sources and inventory of exposed materials within the plan will be updated as needed based on the results of the evaluation in accordance with the Permit. The revisions are to be made within 30 days of the inspection and implementation of corrective actions must take place within 90 days.

A report summarizing the scope of the inspection, personnel making the inspection, date(s) of the inspection, major observations relating to the implementation of the SWPPP, and actions taken shall be made and retained as part of the SWPPP in compliance with Part 4.6.10.2 of the IGP. The report shall be signed in accordance with

Part 6.9 of the IGP. Report forms for documenting the annual comprehensive site compliance evaluation are contained within Appendix E.

The ACSCE may also be used as one of the quarterly inspections, as long as all requirements of both types of inspections are fulfilled.



## **8.0 MONITORING AND REPORTING REQUIREMENTS**

### **8.1 Sampling Locations/Similar Outfalls**

All facilities covered under the IGP are required to conduct monitoring and sampling of the stormwater discharged from the facility as specified in Part 3.3 of the IGP. In general, the permit requires that all outfalls are sampled unless the permittee can justify that certain outfalls drain areas of similar activity. When a stormwater outfall is determined to be similar to another outfall at the facility, the permittee may sample only the discharge point with the highest expected concentration of pollutants. The permit requires documentation of the similar outfall determination within the facility SWPPP. The Drew Foam facility has four outfall locations. Two of the drainage areas for the outfalls are considered substantially similar. Consequently, the Drew Foam facility proposes to sample at Outfall 002 and Outfall 003 because the majority of the industrial activities at the facility take place within these two areas. As required by the permit, justification for this decision is as follows:

#### **A. Location of each of the similar outfalls**

The stormwater outfalls are located on the southwest, northwest, northeast and southeast corners of the developed property. Outfalls 001 and 002 are located on the west side of the property and Outfalls 003 and 004 are located on the east side.

#### **B. Description of general industrial activities conducted in the drainage area of each outfall**

The majority of the industrial activities at the facility take place indoors with no exposure to storm water. The west side drainage area (Outfalls 001 and 002) includes materials receiving areas and final product shipping as well as the base coat wash water containment area and shipping vehicle driveways. The east side drainage area (Outfalls 003 and 004) includes shipping vehicle driveways and the lint trap collection system.

#### **C. Description of control measures implemented in each drainage area**

The control measures implemented at the facility are described in detail within various sections of the facility SWPPP. In general, the facility has a routine schedule of

housekeeping and preventive maintenance to ensure that conditions do not exist that could significantly impact stormwater runoff from the facility. Exposure to potential pollutant sources is minimized to the extent practicable by the use of roofs, curbing and containment systems where applicable. Routine inspections are conducted as described within the plan to ensure that adverse conditions that may arise are corrected as soon as practicable. The facility has policies to prevent the outside storage of miscellaneous materials except in specifically designated areas as described in the SWPPP. These controls are implemented in all drainage areas.

**D. Why the outfalls are expected to discharge similar effluents.**

As described above, Outfalls 001 and 002 are located on the west side of the property and drain similar areas and Outfalls 003 and 004 are located on the east side and drain similar areas. Consequently, the facility proposes to collect stormwater samples only at Outfalls 002 and 003. These outfalls were chosen as the majority of all industrial activities take place within these areas.

## 8.2 Monitoring Requirements

Facilities classified within industrial sector Y2 are required to monitor the stormwater runoff for the following parameters:

Parameter	Benchmark	Concentrations
TSS		100 mg/L
pH		6.0-9.0 s.u
Oil and Grease		15 mg/L
Chemical Oxygen Demand (COD)		120 mg/L

The monitoring period is from January 1st to December 31st of the calendar year. Samples are to be collected twice per year. One sample is to be collected during the six-month period from January to June and the other is to be collected during the period from July to December. The sampling requirements go into effect January 1, 2011 with the first reports due to the ADEQ on January 31, 2012.

### 8.3 Sampling Procedures

A minimum of one grab sample will be collected from Outfall 002 and Outfall 003 within the first 30 minutes of a discharge resulting from a measurable storm event. Part 3.7.2.b. of the permit defines a measurable storm event as any rain event that produces a discharge from the facility. The measurable storm event must be preceded by at least 72 hours of dry weather. If it is impossible to collect the sample within the first 30 minutes of a measurable storm event, the sample must be collected as soon as practicable after the first 30 minutes and documentation must be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes. The date and duration (in hours) of the storm event, rainfall total and time (in days) since previous rain event are to be recorded.

When adverse weather conditions prevent the collection of samples according to the relevant monitoring schedule, a substitute sample must be taken during the subsequent qualifying storm event. Adverse weather does not exempt the facility from having to file a discharge monitoring report in accordance with the sampling schedule.

Analytical methods must conform to the latest revision of the Guidelines establishing Test Procedures for the Analysis of Pollutants contained within 40 CFR 136 or the latest revision of Standard Methods for the Examination of Water and Wastewater, unless otherwise specified by the ADEQ.

### 8.4 Reporting of Monitoring Results/Annual Reports

The monitoring results from each sampling event will be recorded on Discharge Monitoring Reports (DMRs). The DMR will be completed for each sampling event no later than the 31st day of the last month in the monitoring period. Annual reports containing the DMRs for the 12-month monitoring period are to be submitted to the ADEQ by the 31st day of January following the 12 month monitoring period. The Annual Report includes the findings from the comprehensive site compliance evaluation and site inspections (including visual inspections of the outfalls), in addition to the DMRs. The Annual Report will also include any corrective action plans (required for benchmark exceedances) written during the monitoring period and the status of any corrective actions. Each annual report must include the facility name, general permit

tracking number, physical address, and contact person name, title and telephone number. Annual reports are to be signed by the facility Responsible Official as per the conditions of 40 CFR 122.22 and Arkansas Regulation 6.

If the permittee monitors any pollutant at any outfall more frequently than required by the permit using the procedures and protocols addressed in the permit the results of the monitoring shall be included in the reporting.

Records of monitoring information, data, SWPPP, NOI and any other information related to the permit compliance must be retained for a period of three years from the date that coverage under the permit expired or was terminated.

### **8.5 Retention of Records**

As per the IGP, records of all monitoring information, including calibration and maintenance records and all original strip chart recording for continuous monitoring equipment, copies of all reports required by the permit, and records of all data used to complete the application for the permit, monitoring data, the SWPPP and the NOI must be maintained for a minimum three years from the date that coverage under the permit expired or was terminated.

Additional record keeping requirements include:

- Records of all incidents such as spills, leaks and other releases or that result in pollutants being discharged in stormwater runoff (See Attachment C).
- Records of Visual Inspections and Annual Site Compliance Evaluation (Appendix D and E).
- Records of Employee Training (while not specifically required by the General Permit, documentation of the employee training sessions conducted as part of this SWPPP is recommended).

Any other information developed or generated at the facility that describes the quality and quantity of stormwater discharges will be maintained within the stormwater recordkeeping files and incorporated into the SWPPP as required. Inspection and

maintenance activities are recorded as described in previous section and the records maintained within the facility recordkeeping files and incorporated into this document by reference herein. These additional records are maintained within the facility stormwater records for no less than three years from the date of generation.

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## 9.0 DOCUMENTATION OF PERMIT ELIGIBILITY RELATED TO TOTAL MAXIMUM DAILY LOADS

In accordance with the IGP Part 4.6.8 each permittee must include in the SWPPP information on whether or not the stormwater discharge from the facility enters a water body that is on the most recent 303 (d) list or with an approved TMDL.

If the discharge enters water body that is on the most recent 303 (d) list or has an approved TMDL, the following information is to be contained in the SWPPP.

- a) Documentation that the pollutant for which the waterbody is impaired is not present at the facility; or
- b) Additional BMPs must be incorporated into the SWPPP to prevent or minimize the potential for the pollutant to enter the stormwater runoff; or
- c) Identification of measures implemented at the facility to ensure that its discharge of pollutants is consistent with the assumptions and allocations of the TMDL; and
- d) Any wasteload allocation established that would apply to the facility's discharges must be incorporated into the SWPPP.

The stormwater discharge from the Drew Foam facility exits the property at four locations. Outfall 001 discharges at the southwest corner of the facility property into an unnamed creek west of the property boundary. Outfall 002 discharges into a vegetated swale at the northwest corner of the property and flows to the same western unnamed creek. Outfall 003 discharges into a vegetated swale at the northeast corner of the property and flows to an unnamed creek that runs along the facility's eastern property boundary. Outfall 004 drains the southeast quadrant of the site to a low area east of the property line and to the eastern unnamed creek. Both the east and west unnamed creeks flow generally to the north to discharge into Godfrey Creek which flows to the northeast to Lower Cutoff Creek. Lower Cutoff Creek then flows east to Cutoff Creek, south through Seven Devils Lake, thence south to Bayou Bartholomew in Segment 2B of the Ouachita River Basin and ultimately to the south and southwest to the Ouachita River near Bastrop, Louisiana.

A TMDL has been established for Reach 002 of Bayou Bartholomew and Segment 007 of Cutoff Creek. The TMDLs have been developed to address the pollutants:

- a) Turbidity and Mercury in Fish (for Cutoff Creek); and
- b) Turbidity, Chlorides and Mercury in Fish (for the relevant segment of Bayou Bartholomew).

A review of the TMDL document developed for the minerals (Chlorides, TDS, and Turbidity) indicated that the unnamed tributary to Godfrey Creek enters above the TMDL limited segment of Cutoff Creek and that Cutoff Creek enters Bayou Bartholomew upstream of the TMDL limited segment. In addition, the stormwater discharge from the facility is not specifically or generally identified in the TMDL document as upstream of the TMDL limited segments of the streams.

The operations at the Drew Foam facility are not specifically identified in any of the TMDL allocations or assumptions of the TDS and Chloride TMDL. The facility operations do not result in the deposit of chlorides, sulfates or other minerals onsite. Consequently, it is not expected that the stormwater runoff from the Drew Foam facility would contain these minerals at concentrations that would exceed the TMDLs established for the applicable segments of Cutoff Creek or Bayou Bartholomew. The facility does not utilize any mercury containing materials or processes onsite in a manner that would allow the pollutant to be exposed to stormwater. The review of the TMDL developed for mercury did not specifically name the stormwater discharge from the Drew Foam facility in any of the TMDL allocations or assumptions.

Based on the information above it is expected that the BMPs currently implemented at the site will be adequate to ensure that the discharge from the facility will not adversely impact the assumptions or allocations established by the Cutoff Creek or Bayou Bartholomew TMDLs.



## 10.0 ATTAINMENT OF WATER QUALITY STANDARDS

In accordance with the IGP, Part 4.6.9, BMPs must be implemented that will minimize pollutants in the discharge as necessary in the discharge to meet applicable water quality standards. ADEQ Regulation Number 2 establishes water quality standards for the water bodies within the State. The Drew Foam facility is located within the Ouachita River Basin of the Gulf Coastal Ecoregion. Regulation Number 2 also establishes specific water quality standards for designated reaches of Cutoff Creek and Bayou Bartholomew. Both narrative and numeric anti-degradation criteria for dissolved minerals and siltation/turbidity established for both streams. The narrative criteria are:

- a) Mineral quality shall not be altered by municipal, industrial, or other waste dischargers or instream activities so as to interfere with designated uses; and
- b) There shall be no distinctly visible increase in turbidity of receiving waters attributable to municipal, industrial, agricultural, other waste dischargers, or instream activities.

The numeric criteria are:

- a) 30 mg/L chloride, 30 mg/L sulfate, and 220 mg/L TDS; and
- b) 21 NTU primary and 32 NTU storm-flow

The BMPs described within this plan and implemented at the Drew Foam facility are anticipated to be adequate to ensure that the discharge from the facility does not cause or contribute to an excursion above the applicable water quality standards. If at any time during the permit term, the ADEQ determines that the stormwater discharge from the Drew Foam facility has caused or contributed to an excursion above any water quality standard, the facility will modify this plan to include additional BMPs as necessary to prevent such excursions. The facility will also submit data representative of ambient conditions and indicate that the receiving stream is attaining water quality standards.

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**APPENDIX A**  
**Arkansas Industrial General Stormwater Permit**  
**Notice of Intent**  
**Stormwater Correspondence**

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# ADEQ

ARKANSAS  
Department of Environmental Quality

**NOTICE OF INTENT (NOI)  
FOR DISCHARGES OF STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITY  
(EXCEPT FROM CONSTRUCTION ACTIVITY)  
AUTHORIZED UNDER NPDES GENERAL PERMIT ARR000000**

The enclosed form may be used to obtain coverage under NPDES general permit ARR000000 for discharges of stormwater associated with industrial activity (except from construction activity). **Only** a copy of the attached authorized Notice of Intent form will be accepted by this Department.

**DIRECTIONS:**

Industrial Stormwater Permit:

Anyone seeking coverage under the ARR000000 General Permit must perform the following:

- complete all sections of the Notice of Intent.
- Sign the Certification in Section VIII.
- submit the following to the Department:

	Complete NOI	Initial Permit Fee	Deadline for Submittal
New Applicant	Yes	Yes*	Minimum two (2) weeks prior to commencement of stormwater discharge from the facility.
Renewal	Yes	No	September 26, 2010

\* Required by APCEC Regulation No. 9. Subsequent annual fees of \$200.00 per year will be billed by the Department. Failure to remit the required permit fee may be grounds for the Director to deny coverage under this general permit, and to require the owner or operator to apply for an individual NPDES permit.

No Exposure Exclusions:

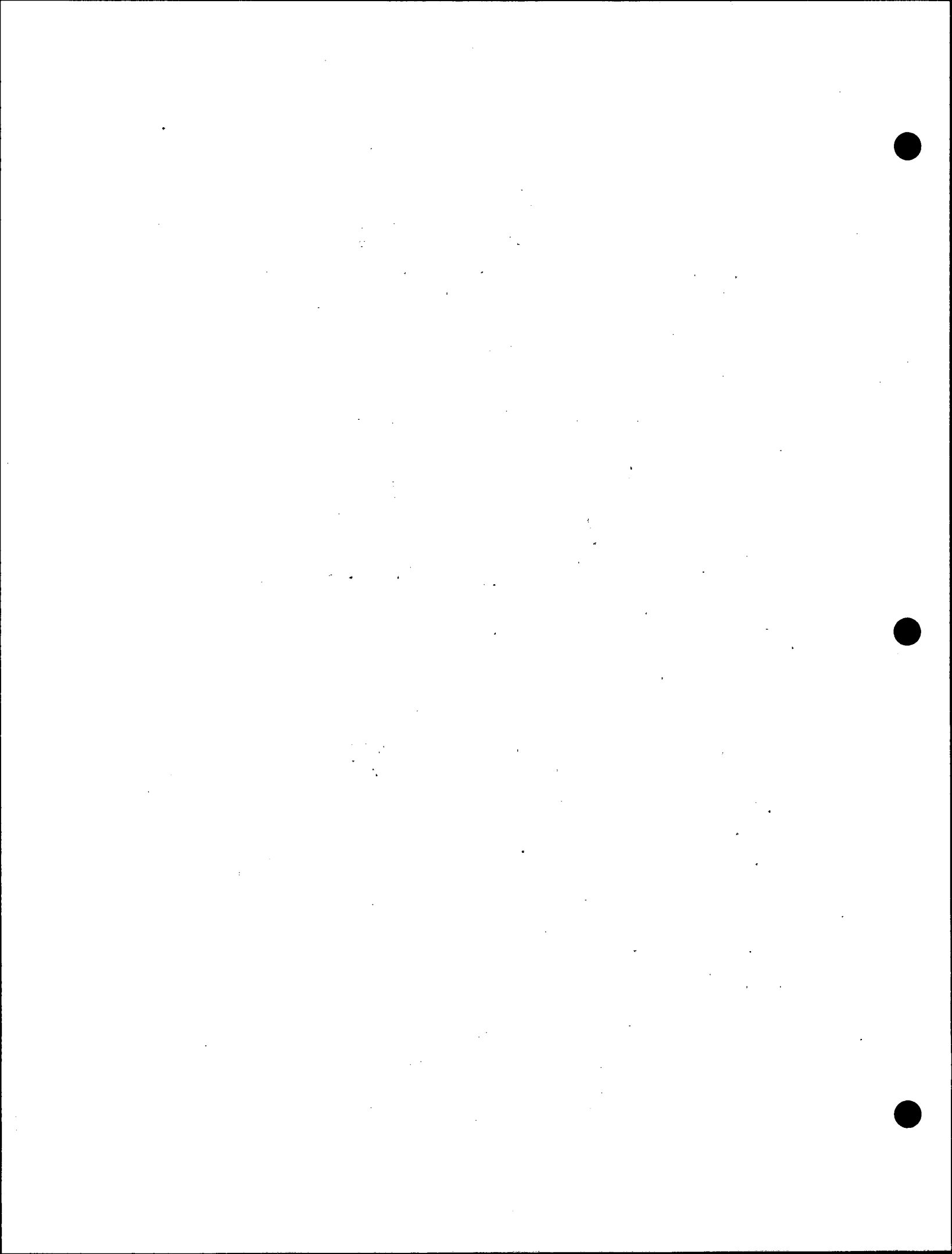
A condition of No Exposure exists at an industrial facility when all industrial materials and activities are protected from exposure to rain, snow, snowmelt, and/or runoff. Anyone seeking a No Exposure Exclusion must complete the No Exposure Certification Form, which can be found at the following website:  
[http://www.adeq.state.ar.us/water/branch\\_permits/general\\_permits/stormwater/industrial.htm](http://www.adeq.state.ar.us/water/branch_permits/general_permits/stormwater/industrial.htm).

Return the completed forms to:

Arkansas Department of Environmental Quality  
Permits Branch, Water Division  
5301 Northshore Drive  
North Little Rock, AR 72118

Or by or by electronic mail (Complete documents (NOI and/or SWPPP) must be submitted in Adobe Acrobat format (.pdf) to: [Water-permit-application@adeq.state.ar.us](mailto:Water-permit-application@adeq.state.ar.us) Notice of Coverage (NOC) will not be issued until payment has been received by ADEQ.

**NOTE: DO NOT LEAVE BLANK SPACES IN THE NOTICE OF INTENT. IF ANY QUESTION DOES NOT APPLY, MARK "N/A" IN THE SPACE PROVIDED.**



# ADEQ

ARKANSAS  
Department of Environmental Quality

For additional information please contact:

General Permits Section  
Ph.: (501) 682-0623  
Fax: (501) 682-0910  
Email: [adeq@state.ar.us](mailto:adeq@state.ar.us)

Additional Instructions:

I. How to Determine Latitude and Longitude:

If a physical address is known go to [www.teraserver-usa.com](http://www.teraserver-usa.com) and proceed with the following steps:

1. Select Advanced Find
2. Select Address
3. Input address
4. Click on Aerial Photo
5. Click on the Info link at the top of the page
6. Note the Latitude and Longitude are in Decimal Coordinates.
7. Go to [www.geology.enr.state.nc.us/gis/latlon.html](http://www.geology.enr.state.nc.us/gis/latlon.html) to convert coordinates to Degrees, Minutes, and Seconds.

NOTE: If a physical address does not exist you may find the coordinates in the Legal Description of the property.

II. Signatory Requirements:

The information contained in this form must be certified by a ***responsible official*** as defined in the "signatory requirements for permit applications" (40 CFR 122.22).

Responsible official is defined as follows:

**Corporation**, a principal officer of at least the level of vice president, treasurer

**Partnership**, a general partner

**Sole proprietorship**: the proprietor

**Municipal, state, federal, or other public facility**: principal executive officer, or ranking elected official





**NOTICE OF INTENT (NOI)  
FOR DISCHARGERS OF STORMWATER RUNOFF  
ASSOCIATED WITH INDUSTRIAL ACTIVITY  
AUTHORIZED UNDER NPDES GENERAL PERMIT ARR000000**

Application Type: New  Renewal  Permit No. ARR00 \_\_\_\_\_

**I. PERMITTEE/OPERATOR INFORMATION**

Permittee (Legal Name)\*: Drew Foam Companies, Inc. Operator Type:  
Permittee Mailing Address: 1093 Hwy 278 East  STATE  PARTNERSHIP  
Permittee City: Monticello  FEDERAL  CORPORATION\*\*  
Permittee State: AR Zip: 71655  SOLE PROPRIETORSHIP  
Permittee Telephone Number: (800) 643-1206  PUBLIC  
Permittee Fax Number: (870) 367-2697  OTHER: \_\_\_\_\_  
Permittee E-mail Address: smcclendon@drewfoam.com \*\*State of Incorporation: AR

\* The legal name of the Permittee must be identical to the name listed with the Arkansas Secretary of State.

**II. INVOICE MAILING INFORMATION (if different from facility mailing address)**

Invoice Contact Person: N/A City: N/A  
Invoice Mailing Company: N/A State: N/A Zip: N/A  
Invoice Mailing Address: N/A Telephone: N/A

**III. FACILITY INFORMATION**

Facility Name  
(if different from Permittee): Drew Foam Companies, Inc.  
Facility Physical Address: 1093 Hwy 278 East Contact Person: Susan McClendon  
Facility County: Drew Contact Title: Chief Financial Officer  
Facility City: Monticello Zip: 71655 Telephone Number: (870) 460-4936  
I-30 south to I-530 south to Pine Bluff,  
Hwy 63 south to Hwy 54 east to Star city,  
South on hwy 425 to Monticello, 278 east  
the facility is on the left.  
Directions to the Facility: the facility is on the left. Fax Number: (870) 367-1564  
AFIN (if known): 22-00046 Email Address: smcclendon@drewfoam.com

Is mailing address different from facility address?  Yes  No If yes, provide mailing address in the space provided.

Mailing Address: N/A  
City: N/A State: N/A Zip: N/A

Type of Business: Polystyrene Foam Product Manufacturing Facility SIC Code(s): 3086 NAICS Code (s): 326140

Description of Major Process(es) at Facility:

EPS bead expansion and molding, billet cutting and shaping, regrinding, laminating, product surface coating, packaging, shipping

List of Chemicals Used in the Process:

High and low pentane content polystyrene beads, adhesive, stucco

Facility Latitude: \* 33 degrees 37 minutes 41.69 seconds

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
WATER DIVISION - PERMITS BRANCH  
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK, ARKANSAS 72118 / PHONE 501-682-0623 / FAX 501-682-0880

www.adeq.state.ar.us

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Revision Date - 03/26/2010

**NOTICE OF INTENT (NOI)  
FOR DISCHARGERS OF STORMWATER RUNOFF  
ASSOCIATED WITH INDUSTRIAL ACTIVITY  
AUTHORIZED UNDER NPDES GENERAL PERMIT ARR000000**

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Facility Longitude: \* 91 degrees 46 minutes 9.72 seconds

\* Facility coordinates should be taken at the entrance to the facility.

**IV. OUTFALL INFORMATION**

Outfall number should be assigned sequentially to stormwater discharge locations if the facility has more than one outfall. (i.e. 001, 002, etc.) These should coincide with the Outfall locations on the site map for the facility.

Outfall: 001

Outfall Latitude: 33 degrees 37 minutes 44.34 seconds

Outfall Longitude: 91 degrees 46 minutes 08.41 seconds

Receiving Stream: Godfrey Creek, which flows to the northeast to Lower Cutoff Creek, then east to Cutoff Creek, thence Bayou Bartholomew

Outfall: 002

Outfall Latitude: 33 degrees 37 minutes 54.43 seconds

Outfall Longitude: 91 degrees 46 minutes 12.42 seconds

Receiving Stream: Godfrey Creek, which flows to the northeast to Lower Cutoff Creek, thence east to Cutoff Creek, thence Bayou Bartholomew

**Similar Outfalls:** Please indicate any similar outfall numbers that the facility may have in accordance to Part 3.7.1.

001/002 and 003/004

Pages may be added for additional outfalls.

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**V. DISCHARGE INFORMATION**

Is this a new discharge?  Yes  No If yes, date coverage desired: N/A

Does the facility have a stormwater pollution prevention plan?  Yes  No

For existing dischargers, date SWPPP was last updated? \_\_\_\_\_

---

**VI. FACILITY PERMIT INFORMATION**

List any additional permits from the Water Division that the facility may have coverage under.

NPDES Individual Permit Number (If Applicable): AR00

NPDES General Permit Number (If Applicable): ARG

NPDES General Construction Stormwater Permit Number (If Applicable): ARR15

No Discharge Permit Number (If Applicable): \_\_\_\_\_

List any permits the facility has from another division within ADEQ: 2132-AOP-R0

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**VII. CONSULTANT INFORMATION (If applicable)**

Consultant Company: ECCI

Consultant Contact Name: Pennye L. Bray

**NOTICE OF INTENT (NOI)  
FOR DISCHARGERS OF STORMWATER RUNOFF  
ASSOCIATED WITH INDUSTRIAL ACTIVITY  
AUTHORIZED UNDER NPDES GENERAL PERMIT ARR000000**

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Consultant Email Address: pbray@eccci.com  
Consultant Address: 13000 City: Little Rock State: AR Zip: 72223  
Consultant Phone Number: (501) 975-8100 Consultant Fax Number: (501) 975-6789

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**VIII. CERTIFICATION OF OPERATOR**

(This statement must be completed for all applicants requesting coverage under the ARR000000. The Certification must be initialed and signed.)

\_\_\_\_\_ "I certify that, if this facility is a corporation, it is registered with the Secretary of State of Arkansas. Please provide the full name of corporation if different than that listed in Section I above."

sm "I certify that a stormwater pollution prevention plan has been developed in accordance with Part 4 of the general permit.

\_\_\_\_\_ "I certify that the cognizant official designated in Part IX of this Notice of Intent is qualified to act as a duly authorized representative under the provisions of 40 CFR 122.22(b). If no cognizant official has been designated, I understand that the Department will accept reports only signed by the applicant."

\_\_\_\_\_ "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information 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 known violations."

Responsible Official Printed Name: Susan McClendon Title: Chief Financial Officer  
Responsible Official Signature: Susan McClendon Date: 8-1-11

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**IX. COGNIZANT OFFICIAL**

Cognizant Official Printed Name: Susan McClendon Title: Chief Financial Officer  
Cognizant Official Signature: Susan McClendon Telephone: (870) 460-4936  
Cognizant Official E-mail: smcclendon@drewfoam.com

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**X. PERMIT REQUIREMENT VERIFICATION**

Please check the following to verify completion of permit requirements.

	Yes	No
Submittal of Complete NOI?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Submittal of Required Permit Fee? (New Discharger Only)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Check Number: \_\_\_\_\_

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
WATER DIVISION - PERMITS BRANCH  
5301 NORTHSORE DRIVE / NORTH LITTLE ROCK, ARKANSAS 72118 / PHONE 501-682-0623 / FAX 501-682-0880

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Revision Date - 03/26/2010

**NOTICE OF INTENT (NOI)  
FOR DISCHARGERS OF STORMWATER RUNOFF  
ASSOCIATED WITH INDUSTRIAL ACTIVITY  
AUTHORIZED UNDER NPDES GENERAL PERMIT ARR000000**

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Additional Outfall Information:

Outfall: 003

Outfall Latitude: 33 degrees 37 minutes 53.95 seconds

Outfall Longitude: 91 degrees 46 minutes 01.12 seconds

Receiving Stream: Godfrey Creek, which flows to the northeast to Lower Cutoff Creek, thence east to Cutoff Creek, thence Bayou Bartholomew

Outfall: 004

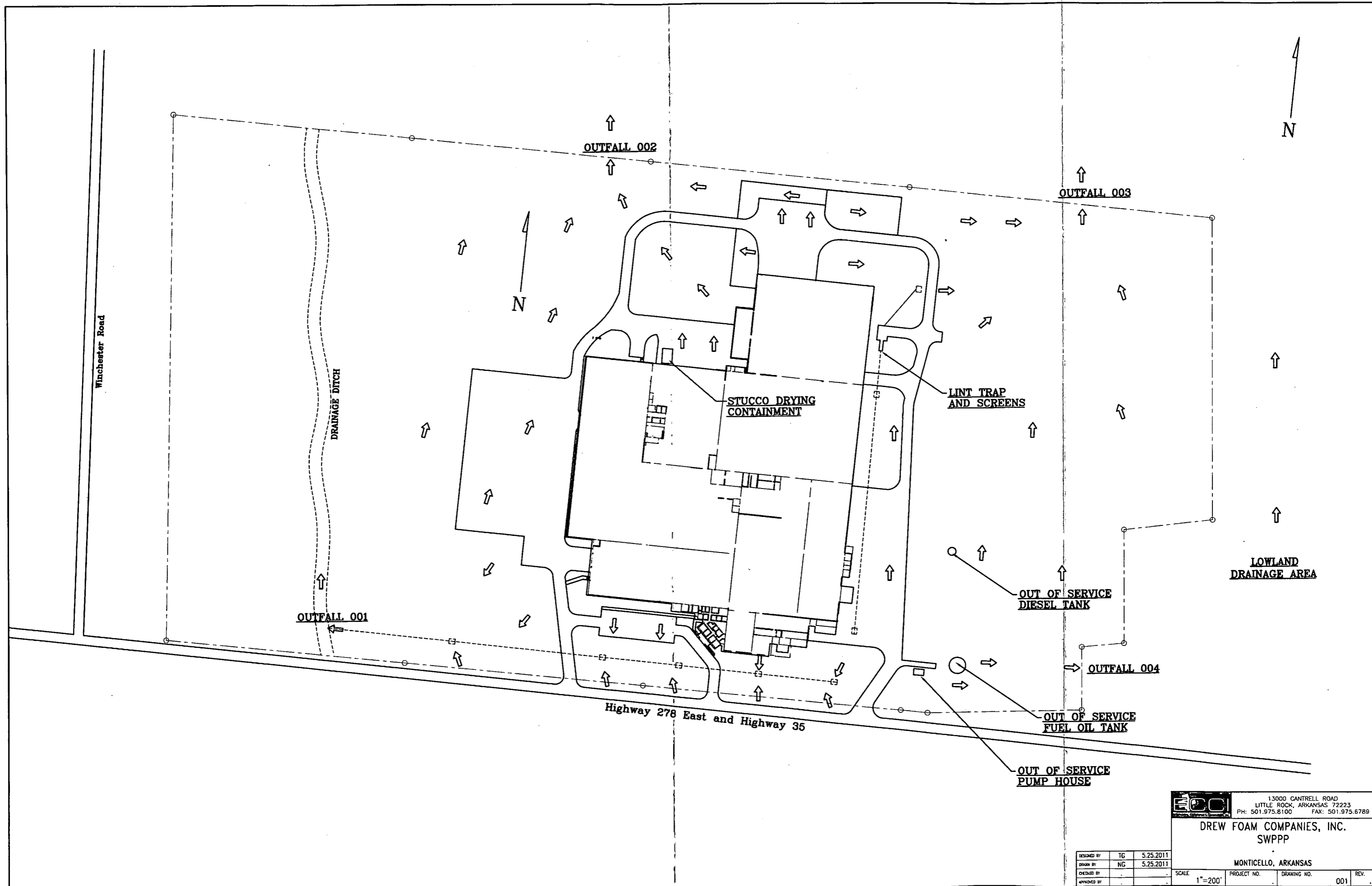
Outfall Latitude: 33 degrees 37 minutes 43.09 seconds

Outfall Longitude: 91 degrees 46 minutes 01.52 seconds

Receiving Stream: Godfrey Creek, which flows to the northeast to Lower Cutoff Creek, thence east to Cutoff Creek, thence Bayou Bartholomew

**APPENDIX B**  
**Site Drainage Map**

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			13000 CANTRELL ROAD LITTLE ROCK, ARKANSAS 72223 PH: 501.975.8100 FAX: 501.975.6789		
<b>DREW FOAM COMPANIES, INC.</b> <b>SWPPP</b>					
MONTICELLO, ARKANSAS					
DESIGNED BY	TG	5.25.2011	SCALE	PROJECT NO.	DRAWING NO.
DRAWN BY	NG	5.25.2011	1"=200'		001
CHECKED BY					REV.
APPROVED BY					

**APPENDIX C**  
**Spill Reporting Form**





**APPENDIX C  
Spill Reporting Form**

Name of Person Preparing Report:		Date Completed:
Date of Incident:		
Time Incident Occurred:		
Description of Spill or Leak:		
Location:		
Type of Material Released:		
Quantity Released:		
Amount of Material Recovered:		
Duration of Release:		
Pollutants Involved:		
Cause of the Incident:		
Weather Conditions During Incident:		
Quantity of Stormwater Released:		
Parties Notified:		
Is Clean-Up Complete?		
Preventive Measures Taken to Prevent Recurrence:		
Additional Information:		



**APPENDIX D**  
**Quarterly Visual Inspection Log**

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**APPENDIX D**

Quarterly Visual Inspection Log  
Drew Foam Companies, Inc.  
Monticello, Arkansas

Inspector: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

Wet Weather or Dry Weather Inspection: \_\_\_\_\_

<b>Inspection Area</b>	<b>Evidence of pollutants on the ground or entering stormwater runoff? Yes/No</b>	<b>Corrective Action Required</b>	<b>Date Completed</b>
Shipping and Receiving Dock			
Forklift Fueling Area			
Lint Trap Screens			
East Side Parking Area for windblown EPS			
Base Coat Surface Drying Containment			
Miscellaneous Materials Storage Area (east side of building)			
Used Oil Transfer Routes			
Diesel Fuel AST and Fueling Area			
Outside perimeter of all Facility Buildings			
Facility Drainage Ditches, Swales, Drains			
Solid Waste Collection Receptacles			

**APPENDIX D  
(continued)**

Quarterly Visual Inspection Log  
Drew Foam Companies, Inc.  
Monticello, Arkansas

<b>Observations:</b>	<b>Outfall</b>	<b>001</b>	<b>Outfall</b>	<b>002</b>
Floating Debris?		_____		_____
Visible Sheen?		_____		_____
Surface Discoloration?		_____		_____
Turbidity?		_____		_____
Odor?		_____		_____

<b>Observations:</b>	<b>Outfall</b>	<b>003</b>	<b>Outfall</b>	<b>004</b>
Floating Debris?		_____		_____
Visible Sheen?		_____		_____
Surface Discoloration?		_____		_____
Turbidity?		_____		_____
Odor?		_____		_____

If a dry weather evaluation, was the site inspected for unauthorized non-stormwater discharges? \_\_\_\_\_ Were any such discharges identified? \_\_\_\_\_

Miscellaneous Observations/Notes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature of Inspector:

(Note: At least one quarterly inspection must be a wet weather inspection)

**APPENDIX E**  
**Annual Comprehensive Site Compliance Evaluation Report Form**





**APPENDIX E**

**Annual Comprehensive Site Compliance Evaluation Report Form**

Drew Foam Companies, Inc.  
Monticello, Arkansas

Inspector: \_\_\_\_\_

Date: \_\_\_\_\_

Permit Tracking Number: \_\_\_\_\_

**Section 1. Evaluation Potential Pollutant Source Identified in Plan**

Page 1 of 5

<b>Area/Activity Inspected</b>	<b>Evidence of pollutants entering the runoff from the area?</b>	<b>BMPs Adequate? Yes/No</b>	<b>Corrective Actions/Additional BMPs identified</b>	<b>Date Corrective Actions/BMPs implemented</b>
Shipping and Receiving Dock				
Forklift Fueling Area				
Lint Trap Screens				
East Side Parking Area for windblown EPS beads				
Base Coat Surface Drying Containment Area				
Miscellaneous Materials Storage Area (east side of building)				
Used Oil Transfer Routes				
Diesel Fuel AST and Fueling Area				

**APPENDIX E  
(continued)**

**Annual Comprehensive Site Compliance Evaluation Report Form  
Drew Foam Companies, Inc.  
Monticello, Arkansas**

**Section 1. Evaluation Potential Pollutant Source Identified in Plan (continued)**

Area /Activity Inspected	Evidence of pollutants entering the runoff from the area?	BMPs Adequate? Yes/No	Corrective Actions/Additional BMPs identified	Date Corrective Actions/BMPs implemented
Outside perimeter of all Facility Buildings				
Facility Drainage Ditches, Swales, Drains				
Solid Waste Collection Receptacles				

**Section 2. Review inventory of potential pollution sources for additions, deletions and/or changes.**

	OBSERVATIONS
Potential Pollutant Sources To Be Added to Plan	
Potential Pollutant Sources Deleted From Plan	
Changes to Potential Pollutant Sources Currently Identified in Plan	

**APPENDIX E**

**Annual Comprehensive Site Compliance Evaluation Report Form**  
Drew Foam Companies, Inc.  
Monticello, Arkansas

**Section 3. Evaluate the Facility for the Presence of Unauthorized Non-Stormwater Discharges:**

Unauthorized non-stormwater observed?	Yes	No
If Yes, corrective action implemented?	Yes	No
Date non-stormwater unauthorized discharge eliminated?		

**Section 4. Outfall Observations: (Yes/No)**

**Outfall 001      Outfall**

Floating Debris: \_\_\_\_\_  
Visible Sheen: \_\_\_\_\_  
Surface Discoloration: \_\_\_\_\_  
Turbidity: \_\_\_\_\_  
Odor: \_\_\_\_\_

**002**

Floating Debris: \_\_\_\_\_  
Visible Sheen: \_\_\_\_\_  
Surface Discoloration: \_\_\_\_\_  
Turbidity: \_\_\_\_\_  
Odor: \_\_\_\_\_

**Outfall 003      Outfall**

Floating Debris: \_\_\_\_\_  
Visible Sheen: \_\_\_\_\_  
Surface Discoloration: \_\_\_\_\_  
Turbidity: \_\_\_\_\_  
Odor: \_\_\_\_\_

**004**

Floating Debris: \_\_\_\_\_  
Visible Sheen: \_\_\_\_\_  
Surface Discoloration: \_\_\_\_\_  
Turbidity: \_\_\_\_\_  
Odor: \_\_\_\_\_

**APPENDIX E**

**Annual Comprehensive Site Compliance Evaluation Report Form**

Drew Foam Companies, Inc.

Monticello, Arkansas

**Section 5. Evaluate effectiveness of the existing Best Management Practices (BMPs)**

**Page 4 of 5**

<b>BMPs</b>	<b>Adequate/Inadequate</b>	<b>Comments and/or Actions Required</b>	<b>Date Implemented</b>
Housekeeping			
Preventive Maintenance			
Spill Prevention and Control			
Visual Inspections			
Employee Training			
Sediment and Erosion Control			
Management of Runoff			
Record Keeping			

**Section 6. Ensure that existing structural stormwater control measures are operating properly.**

<b>Structural Control</b>	<b>Operating Properly?</b>		<b>Comments and/or Corrective Actions Required</b>	<b>Date Implemented</b>
Storm Drains, Drainage Ditches and Culverts	Yes	No		
Lint Trap Screens	Yes	No		

**APPENDIX E  
(continued)**

**Annual Comprehensive Site Compliance Evaluation Report Form  
Drew Foam Companies, Inc.  
Monticello, Arkansas**

**Section 7. Indicate Significant Changes to the SWPPP resulting  
from the Inspection and Date of Completion**

**Page 5 of 5**

<b>Change Made to SWPPP (Section and Page)</b>	<b>Date of Modification</b>	<b>Date Changes were Implemented</b>

**Section 8. Certification of Inspection**

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

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

July 2011

ECCI

**APPENDIX E**  
**(continued)**

**Annual Comprehensive Site Compliance Evaluation Report Form**  
Drew Foam Companies, Inc.  
Monticello, Arkansas

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**APPENDIX F**  
**Record of SWPPP Review/Update**

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July 2011





**Appendix F**  
**Record of SWPPP Review/Update**

Drew Foam Companies, Inc.  
Monticello, Arkansas

Any reviews, updates, revisions, and/or amendments of this Stormwater Pollution Prevention Plan (SWPPP) should be recorded below. The date of the review and/or update should be entered, as well as any pertinent comments on the nature of any changes made to the Plan. Approval of the revisions is indicated by signature by a responsible official for the Drew Foam Companies, Inc. facility in Monticello, Arkansas.

<b>Revision No.</b>	<b>Date</b>	<b>Signature</b>	<b>Comments</b>
0	July 2011		Original SWPPP developed by ECCI

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**APPENDIX G**  
**SWPPP Record of Employee Training**

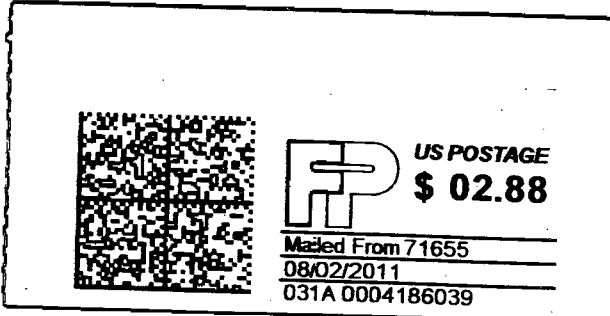






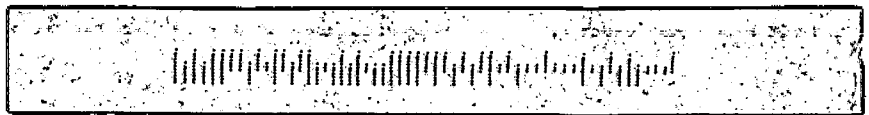
1093 Hwy 278 EAST  
MONTICELLO, AR

71655



Mr. Mo Shafii  
ADEQ, WATER Division  
5301 Northshore Drive  
North Little Rock, AR

72118







**Storm Water Pollution Prevention Plan (SWPPP) Completeness Checklist**

**Permittee:** Drew Foam Companies  
**Facility Name:** Drew Foam Companies

**Tracking Number:** ARR00 0817

**Yes = Complete**  
**No = Incomplete/Deficient**  
**N/A = Not Applicable to Project**

**F. Control Measures.**

Yes	No	N/A		
X			1. Best Management Practice (BMP's)	Part 4.6.6.1
X			2. Minimize Exposure	Part 4.6.6.2
X			3. Good Housekeeping	Part 4.6.6.3
X			4. Preventative Maintenance	Part 4.6.6.4
X			5. Spill Prevention and Response Procedures	Part 4.6.6.5
X			6. Employee Training	Part 4.6.6.6
X			7. Erosion and Sediment Control	Part 4.6.6.7
X			8. Management of Run-on and Runoff	Part 4.6.6.8
		X	9. Salt Storage Piles	Part 4.6.6.9

X			<b>G. Authorized Non-Stormwater Discharges.</b>	Part 4.6.7
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**H. 303(d) and TMDL's**

X			1. Are pollutants listed on the 303(d) list or in the TMDLs for the receiving waters addressed in SWPPP?	Part 4.6.8
X			2. Have pollutants directly related to the site been addressed?	Part 4.6.8
X			3. Measures taken to reduce pollutants from the site.	Part 4.6.8

**I. Evaluation and Inspections.**

X			1. Visual Site Inspections (Minimum 4/year)	Part 4.6.10.1
X			2. Compliance Site Evaluations (Once/year)	Part 4.6.10.2

X			<b>K. Signed Plan certification.</b>	Part 4.6.12
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