

Harbor Point – Parcel 4 Mixed Use
STORMWATER POLLUTION PREVENTION PLAN

*Honeywell Baltimore Works Site
Baltimore, Maryland*

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1.0 INTRODUCTION

Harbor Point Parcel 4 Development, LLC (HPD; Developer) and its consultants have prepared this Stormwater Pollution Prevention Plan (SWPPP) for the Harbor Point – Parcel 4 Mixed Use site, on the former AlliedSignal Baltimore Works Site (or “Site”), located in Baltimore, Maryland. This SWPPP presents best management practices for managing stormwater runoff during construction activities identified in the Detailed Development Plan (DDP). This SWPPP was prepared in support of the DDP for the Harbor Point – Parcel 4 Mixed Use project (or “Project”), on the former AlliedSignal Baltimore Works Site (or “Site”), located in Baltimore, Maryland. This SWPPP pertains to the construction of the Harbor Point – Parcel 4 Mixed Use project, consisting of Phase 1: an 8-story podium on the western portion of the Project, containing a 1,292-car parking garage, retail spaces, and apartment units, with a 17-story apartment tower atop the southwestern portion of the podium. Phase 1 will also include a linear park constructed adjacently east of the garage/apartment building. In future Phase 2, an 8-story hotel will be built on the eastern portion of the Project, east of the linear park.

1.1 REGULATORY BACKGROUND

This SWPPP has been prepared in accordance with the United States Environmental Protection Agency (USEPA) and Maryland Department of the Environment (MDE) regulations governing stormwater runoff. The federal requirements regarding stormwater runoff are codified under the National Pollutant Discharge Elimination System (NPDES) regulations, found in Title 40, Part 122, Subpart B of the Code of Federal Regulations (40 CFR 122.26). USEPA has delegated NPDES authority in the State of Maryland to MDE. The State regulations governing the stormwater discharge permit program are codified in the Code of Maryland Regulations in Title 26, Subtitle 08 and Subtitle 17 (COMAR 26.08 and COMAR 26.17).

Federal stormwater regulations 40 CFR 122.26(a)(1)(ii) and 40 CFR 122.26(b)(14) and corresponding state stormwater regulations require a permit for the discharge of stormwater associated with industrial activities within SIC code 2813. The State of Maryland, through the MDE, has primacy for NPDES stormwater discharges. A General Discharge Permit for Stormwater Associated with Construction Activities will be required for implementation of the construction project.

The management activities for compliance with this permit are provided in the site’s Erosion and Sediment Control Plan. As noted above, this SWPPP is intended to discuss best management practices for managing stormwater runoff during construction activities. This SWPPP should be utilized in conjunction with other plans as discussed in Section 1.3.

This SWPPP was developed in accordance with the requirements of USEPA’s NPDES Multi-Sector General Permits for Stormwater Discharges Associated with Industrial Activities as published in the Federal Register on October 30, 2000. A copy of this SWPPP must be kept on site at all times.

1.2 PURPOSE

The purpose of the SWPPP is to evaluate potential pollution sources at the Project that could come in contact with stormwater and to select and implement appropriate measures to mitigate or control the discharge of pollutants in stormwater runoff.

The pollution prevention approach focuses on three objectives: (1) to identify sources of pollution potentially affecting the quality of stormwater discharges associated with industrial activity from the facility; (2) to describe and outline implementation of practices to minimize and control pollutants in stormwater discharges associated with industrial activity from the facility; and (3) to provide a mechanism for compliance with the terms and conditions of the General Permit.

This SWPPP document is a foundation for the facility's stormwater pollution prevention program. This document is revised accordingly as conditions and practices at the facility change to accommodate new methods of production, storage and material transfer.

The SWPPP describes activities, materials and physical features of the facility that may contribute pollutants to stormwater runoff and the procedures and methods that are used to minimize these impacts.

1.3 CONSISTENCY WITH OTHER PLANS

This SWPPP serves as an Environmental Control Document, as a component of the DDP for the Project. Other Environmental Control Documents include the following.

- The Material Handling and Management Plan (MHMP) addresses the handling and management of solids (asphalt, stone aggregates, concrete and wood debris, and soil) and liquids (groundwater and stormwater) that may be encountered during the intrusive activities at the Site. This Plan also includes dust control measures that describe soil/debris handling practices to be implemented to minimize dust emissions.
- The Construction Air Monitoring Plan (CAMP) specifies air monitoring and response actions to ensure the safety of workers and the public during construction related to potential airborne contaminants.
- The Spill Prevention and Response Plan (SPRP) is intended prevent hazardous material and petroleum product discharges (i.e., spills) from occurring, and mitigate the effects of a discharge, should one occur.
- The Health and Safety Plan (HASP) Guidance is intended to address worker safety related to potential exposure to environmental constituents of concern and can be used, as appropriate, by Contractors engaged in preparing bids and contractor-specific HASPs.

1.4 EXISTING CONDITIONS

The Project contains an asphalt paved parking lot that was constructed in 2003 for Cirque de Soleil and is currently used for temporary surface parking for nearby developments. Several temporary trailers are located along the western site of the Project, and a stormwater management basin is located on the

northern portion of the Project. The southeastern portion of the Project contains a sanitary sewer pump station, situated on the former 950 South Caroline Street parcel. The C-Series DDP Drawings show the Project. Drawing EN1.01 shows including Area 1, Area 3, the existing Environmental Remediation System (ERS), and other pertinent Site features.

2.0 IDENTIFICATION OF POTENTIAL POLLUTION SOURCES

2.1 OVERALL ENVIRONMENTAL CONDITIONS

The principal contaminant of concern in Area 1 is hexavalent chromium (CrVI). An Environmental Remediation System (ERS) is maintained and operated by Honeywell International Inc. (Honeywell) to contain CrVI-impacted groundwater in Area 1 pursuant to the requirements of the Consent Decree by and between Honeywell, the U.S. Department of Justice, the United States Environmental Protection Agency (USEPA), and the Maryland Department of the Environment (MDE). The ERS consists of a Multimedia Cap (MMC), Hydraulic Barrier (HB), Head Maintenance System (HMS), a groundwater storage and transfer system, and the Outboard Embankment in Area 1; the layered soil cap (LSC) in Area 2; and the soil cap on the former Silver North and Silver South parcels in Area 3.

Historical sampling and analysis data from the Project area (Area 3 and non-designated areas) have identified elevated concentrations of some parameters, mainly including metals (lead and chromium), petroleum, and some polycyclic aromatic hydrocarbons (PAHs). The more significant soil contamination was found on the eastern portion of the Project, which necessitated the Area 3 cap. Some groundwater sampling has also identified elevated total chromium concentrations, although the primary area with chromium impacts is west of the Project, on Area 1.

In September 2019, additional environmental sampling and analysis were performed relevant to the Project footprint, resulting in additional data for the Project. These results are summarized in a report titled *Groundwater Evaluation and Soil Waste Characterization Summary*, dated September 6, 2019. The evaluation included groundwater samples collected from four soil borings. The results indicated total chromium concentrations ranging from 870 micrograms per liter ($\mu\text{g/L}$) to 47,000 $\mu\text{g/L}$. No detectable hexavalent chromium concentrations were reported.

The overall Site development must not interfere with the efficacy of the corrective measures or Honeywell's ability to comply with the performance standards defined in the Consent Decree; the Groundwater Gradient Monitoring Plan; the Surface Water Monitoring Plan; and the Environmental Media Monitoring Plan. This DDP describes the redevelopment improvements and the means and methods that will be implemented to meet the requirements established in the Consent Decree and its Work Plans, as amended, as well as the Owner/Developer covenants. Honeywell retains responsibility for operating the ERS and monitoring environmental media to demonstrate continued attainment of Consent Decree performance criteria.

2.2 WATER CATEGORIES AND MANAGEMENT PRACTICES

Two categories of water are anticipated to require management during intrusive work, as follows.

- Contact Water:
 - Groundwater that collects in excavations.
 - Stormwater that collects in excavations that are deep enough to encounter groundwater.
 - Stormwater collected from sumps in Controlled Staging Areas.
 - Equipment decontamination water.
- Non-Contact Water: Stormwater that is collected in excavations other than those described for Contact Water.

As specified in the MHMP, Contact Water and Non-Contact Water will be transported via piping to 21,000-gallon double-walled Frac tanks segregated by water category. As a result, Contact Water will not be stored in Frac tanks designated for Non-Contact Water, and Non-Contact Water will not be stored in Frac tanks designated for Contact Water.

Contact Water will be transferred from the Frac tanks by vacuum trucks, which will transport the contact water to a hazardous waste facility for disposal. All connections between the Frac tanks and the vacuum trucks will be tightly secured prior to the beginning of the transfer process. All transfers of Contact Water will be made with double-walled pipelines. Contact Water tanks will be labeled appropriately upon placing waste into the container and will be managed in accordance with COMAR 26.13.03.

Non-Contact Water will be held for analytical testing results to determine proper disposal. This Non-Contact Water may be discharged to the storm system if testing indicates the appropriate MDE discharge limits are not exceeded. If the permit limits are exceeded, Non-Contact Water will be properly disposed off-site at Environmental Quality (EQ).

Honeywell maintains a list of approved Subtitle C landfill facilities. Alternative disposal facilities must be pre-approved. The following RCRA landfill facilities are located within reasonable proximity to the Site and may be considered:

- US Ecology (EQ) [EPA ID: PAD010154045]
730 Vogelsong Road
York, PA 17404
Facility is located approximately 60 miles north of the Site.
- MAX Environmental Technologies, Inc. [EPA ID: PAD004835146]
233 Max Lane
Yukon, PA 15698
Facility is located approximately 220 miles northwest of the Site.
- CWM Chemical Services, LLC a Waste Management, Inc. Company [EPA ID: NYD049836679]
1550 Balmer Road
Youngstown, NY 14174
Facility is located approximately 380 miles north of the Site.

2.3 OTHER POTENTIAL POLLUTION SOURCES

There is also the potential for fuel leaks during construction activities, such as during fuel deliveries, refueling of equipment, and on-site fuel storage. This potential pollution source is discussed in the SPRP.

3.0 BEST MANAGEMENT PRACTICES FOR STORMWATER MANAGEMENT CONTROLS

Best Management Practices (BMPs) for stormwater management control are described in this section. The BMPs were developed using EPA's publication *Stormwater Management for Industrial Activities* (October 1992) as a guidance.

Baseline BMPs are employed across the entire Site and are not necessarily associated with any specific source of significant materials. The BMPs described below are consistent with the conditions of the General Permit to ensure proper management of stormwater runoff.

3.1 EXISTING BMPs

The existing BMPs include the asphalt cover in Area 3 and the stormwater retention pond on and adjacently northwest of Area 3.

3.2 DURING CONSTRUCTION

This SWPPP addresses best management practices for managing stormwater runoff during construction activities.

3.2.1 CONTACT WATER

Groundwater will presumably be encountered in the deepest excavations for the Project (e.g., certain pile caps and utilities). Groundwater may also be encountered in other areas. All groundwater that is managed from excavations will be collected and managed as Contact Water. Stormwater that collects in excavations that are deep enough to encounter groundwater will also be collected and managed as Contact Water. If stormwater is collected in Controlled Staging Areas, and if equipment decontamination water is generated, these liquids will be designated Contact Water and will be pumped using temporary pumps from the downslope portion of the bermed areas to a designated double-walled Frac tank reserved for Contact Water.

Contact Water will be stored, tested, and disposed in accordance with the MHMP.

3.2.2 NON-CONTACT WATER

Stormwater will be diverted from excavation zones by installing the required erosion and sediment controls as shown on the C-Series Drawings. Stormwater that is collected in excavations other than those described for Contact Water will be collected and managed as Non-Contact Water. This will include stormwater that collects and requires management in non-Area 1 excavations where groundwater is not present.

Non-Contact Water will be stored, tested, and discharged/disposed in accordance with the MHMP.

3.2.3 STORMWATER MANAGEMENT SYSTEM

The stormwater management plan was examined for the 25-year storm event and 100-year storm event; however, the storage requirements were determined based primarily on the 25-year storm event. When a storm event occurs, the entire footprint of the excavation, including the sloped portions, is considered to receive stormwater. All water that falls outside of the excavations is treated as surface runoff and will not require collection and management because it will be diverted away from open excavations by temporary berms.

The maximum area open to stormwater, potentially generating Contact Water, is 4,000 square feet (a typical area of two large pile caps). The 24-hour rainfall during a 25-year storm event is 5.5 inches, yielding a total volume of 13,700 gallons for these excavations. The 24-hour rainfall during a 100-year storm event is 7.1 inches, yielding a total volume of 17,700 gallons. One Frac tank rated at 21,000 gallons will handle the volume generated by more than one 25-year storm events or one 100-year storm event for such an excavation. In order to provide sufficient storage and redundancy, two Frac tanks (#1 and #2) will be designated for storage of Contact Water.

Similarly, stormwater collected from the bottom of the non-Area 1 excavations will be considered Non-Contact Water. To address this, sumps and portable pumps will be used to dewater the excavations on an as-needed basis. This Non-Contact Water will be managed as discussed in the MHMP.

Using the same volumetric calculations as those presented above for Contact Water, and in order to provide sufficient storage and redundancy, two Frac tanks (#3 and #4) will be designated for storage of Non-Contact Water.

3.2.4 SNOW AND ICE

Snow or ice that collects or is formed consistent with the above parameters for Contact Water and Non-Contact Water will be handled in the manner provided above for the respective Contact or Non-Contact situation. Snow and/or ice will be removed from the area and temporarily stored in lined, sealed containers so that the snow and/or ice can melt. Melted snow and/or ice will be pumped (using double-walled pipes) from the lined containers to the Contact Water or Non-Contact Water Frac tanks for testing to determine the appropriate disposal action.

3.2.5 EROSION AND SEDIMENT CONTROL

Erosion and sediment control at the Project and during construction will be addressed with conventional best management practices, which include silt fence/super silt fence, perimeter berms/swales, stabilized construction entrances, and inlet protection as detailed in the DDP Drawings. The area of disturbance, as provided on the C-Series Drawings, is 3.27 acres. Prior to the initiation of any intrusive activities, the erosion and sediment controls and stormwater management features will be installed in accordance with the permit drawings to be prepared and submitted to the City of Baltimore under separate cover, and in accordance with the General Permit to Discharge Stormwater associated with Construction Activities, to be submitted to MDE Water Management Division under separate cover.

Erosion and sediment controls as detailed on the C-Series Drawings will be applied to individual excavations made for pipe pile, clean utility corridor, and pile cap and slab installation, including stormwater diversion berms to reduce or limit run-on into open excavations.

In accordance with COMAR 26.13.03.05E, hazardous waste shall be shipped off-site within 90 days of generation of the waste to an approved, permitted facility. Specific provisions, e.g. container labeling, secondary containment, inspection, and recordkeeping, will be followed.

3.2.6 SPILL PREVENTION AND RESPONSE

The SPRP outlines spill prevention and control measures and should be reviewed for more detail. The following measures should be implemented upon discovery of a release:

- Control and contain the release, to the extent possible;
- Clean up the impacted area as soon as possible;
- Assess the risk;
- Implement the construction SPRP based on the source of the release;
- Report the release to management and government agencies; and
- Follow up with preventive measures and any necessary documentation.

Site personnel will immediately commit all necessary manpower, equipment, and materials required to prevent the spill from reaching waterways, shorelines, or sewers.

3.2.7 GOOD HOUSEKEEPING

Good housekeeping practices are designed to maintain a clean and orderly work environment during construction activities, including:

- Maintain clean vehicle access roads;
- Keep all paved and vegetated areas clean of litter and debris and properly maintained.
- Maintain regular refuse pick-up and disposal;
- Spill response equipment is properly located, in adequate supply and working order, and the location(s) are known to all employees;
- Promptly clean up spills and leaks and properly dispose of recovered material;
- Keep walkways and passageways easily accessible and free of protruding objects, materials, and equipment;
- Make sure all trucks which entered any disturbed area, have gone through decontamination procedures for tires, prior to leaving the site; and
- Discuss and promote good housekeeping practices with employees. Good housekeeping elements are covered in the stormwater inspections and throughout the Facility's stormwater management process.

3.2.8 VISUAL INSPECTIONS

Stormwater inspections will be conducted at this facility as required. At a minimum, authorized personnel will perform a monthly inspection of the Facility. The trained inspector will perform the inspections consistent with the requirements of the General Discharge Permit and MHMP. A copy of the General Discharge Permit will be provided to MDE. The inspections will be performed to detect evidence of potential common problems that may occur during construction.

At the completion of each inspection, the inspector will review the SWPPP to determine if any observation may require revisions to the SWPPP. Any suggested revisions to the SWPPP will be brought to the attention of the Developer to determine if revisions are necessary. No changes to the SWPPP may be implemented without prior MDE approval.

In addition to the monthly inspections, the proposed outfalls will be inspected quarterly and after major storm events. The inspections will be performed to detect evidence of potential stormwater blockage or pollution.

3.3 POST-CONSTRUCTION

This SWPP pertains specifically to the Harbor Point – Parcel 4 Mixed Use construction. It effectively terminates post-construction. BMPs incorporated into the constructed project are intended to collect, convey, and manage stormwater from the developed site.

3.3.1 MANAGEMENT OF RUNOFF

Pursuant to an approved Minor Modification to the Area 1, Phase 1 DDP, the two final infiltration wells from the original five-well stormwater infiltration system will be completed during the construction of Parcel 4. Pursuant to the approved plan, these infiltration wells will be able to receive stormwater that is generated from the Project. The well locations are depicted on Drawing EN1.01.

The majority of the Project's stormwater (from the building roofs and linear park) will be directed into an underground stormwater management system to control stormwater quantity and quality. The system will consist of various stormwater retention structures (e.g., Contech Stormfilters and/or other similar types of structures), installed beneath the linear park. This system will provide the option of discharging to the infiltration well system east of Area 1 to facilitate recharge, or discharging to the municipal stormwater management system after being retained and treated in the system.

Stormwater runoff from the perimeter of the project will be collected in catch basins and into the existing stormwater drainage systems located in the adjoining roadways. These systems outfall into the existing 30-inch storm drain system located in South Caroline Street, which subsequently outfalls into the Harbor to the north of South Caroline/Dock Street intersection.

3.3.2 PREVENTIVE MAINTENANCE

Preventive maintenance involves the timely inspection and maintenance of stormwater management devices as well as inspecting and testing facility equipment and operational systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.

Honeywell's on-site consultant, Jacobs, performs inspections and preventive maintenance at the overall Site (primarily Area 1), as well as operations, maintenance, and inspections required by the Consent Decree. The surrounding buildings and associated parking areas are maintained by the building owner and management company.

The preventive maintenance program for facility equipment is intended to mitigate breakdowns or failures by adjustment, repair, or replacement, and includes the following elements:

- identification of equipment at the facility that should be inspected;
- a schedule for periodic inspections of the equipment;
- appropriate and timely adjustment, repair, or replacement of equipment;
- maintenance of complete records of inspections and equipment;
- preventive maintenance for site management areas and sediment; and
- erosion control structures includes inspection for debris or other clogging material to ensure proper functioning of the structures, repair of minor erosion, cleaning of ditches and structures, reseeding and fertilization of vegetative areas.

3.3.3 GOOD HOUSEKEEPING

Good housekeeping practices require that the facility is maintained in a clean and orderly manner. This is accomplished through instilling proper employee work habits and by training and checking the progress through visual inspections. Good housekeeping assures that:

- floors and surfaces are kept clean and orderly;
- spill response equipment is properly located, in adequate supply and working order, and the location(s) are known to all employees;
- spills and leaks are promptly cleaned up and recovered material is properly disposed; and
- all paved and vegetated areas are routinely kept clean of litter and debris and are properly maintained.

Employees should be familiar with and have access to the SPRP, in Appendix C of the DDP, for specific procedures and protocols regarding spills and leaks.

Floors and ground surfaces should be cleaned by sweeping or shoveling and not by washing. Hosing down an area with water increases the potential for pollutants to be carried down-gradient to be released at a later time into stormwater. Brooms should be stored in an appropriate area and should not be exposed to precipitation. Shovels should be cleaned before being stored.

Sorbents are materials that are capable of cleaning up spills through the physical/chemical processes of adsorption and absorption. Typical sorbent materials that can be thrown onto a spill on paved surfaces include clays, sand, kitty litter, and sorbent booms, matting and pads. Sorbent booms should be used to absorb spills on unpaved areas. For absorbent materials to be effective, they must be applied immediately onto the spilled area, and cleanup should proceed immediately. Proper disposal of the used absorbent material is necessary. Additional activities for spills on unpaved areas after the spill has been contained and sorbent materials applied include the removal of materials impacted by the spill, i.e., excavation. These materials shall be staged in proper containers and disposed at a permitted off-site facility.

In the areas outside of the Point Street Apartments and Garage, good housekeeping involves:

- picking up refuse and recyclables deposited outside of any dumpsters or trash bins;
- sweeping or shoveling any dry/solid materials that may have accumulated outside of any dumpsters and recycled material collection areas;
- proper disposal of refuse and recyclable materials;
- keeping walkways and passageways easily accessible; and
- cleaning the storm drain inlets.

3.4 SWPPP REVISIONS

This SWPPP will be amended whenever there is a change in design, operation, maintenance, or other circumstances that materially increase the potential for releases of significant materials, or that changes the response necessary in an emergency. No changes to the SWPPP may be implemented without prior MDE approval.

This SWPPP will also be amended in the event of new regulations, there is a change in the Developer's team, or if the SWPPP proves ineffective in achieving the general objective of controlling stormwater discharges. At least once a year, the Developer's Team will review and discuss the appropriateness of the SWPPP, and determine whether the SWPPP requires revisions. As appropriate, the plan will be revised within a reasonable time period following the plans annual review.

Amendments to the SWPPP will be recorded on a SWPPP Revisions Log and appended to this document.

4.0 STORMWATER POLLUTION PREVENTION TEAM AND TRAINING

4.1 PROJECT SPECIFIC TEAM MEMBERS AND RESPONSIBILITIES

The members of the Stormwater Pollution Prevention Team are listed below:

Facility Coordinator During Construction: Jonathan Flesher: (443) 463-3937

Resident Site Manager: Bryn Hansen (410) 404-9111

The above-listed persons are trained to implement the SWPPP.

Mr. Flesher will designate an inspector for the SWPPP responsible for monthly inspections and documentation as well as assurance that appropriate BMPs are in place. The Facility Coordinator has the overall responsibility for ensuring plan adherence, updated training, and authorizing the resources necessary to implement the SWPPP, including inspections and corrective measures. Honeywell's on-site consultant, Jacobs, represented by the Resident Site Manager, will monitor compliance with procedures for inspections and preventative maintenance at this facility during construction. During construction, the Developer's Field Representative will perform the necessary inspections. Additional team members will provide support on an as needed basis.

4.2 TRAINING REQUIREMENTS

Members of the pollution prevention team are responsible for conducting employee training programs. The employee training programs are designed to inform personnel at all levels of responsibility of the components and goals of the SWPPP. Training sessions, including initial orientation training, will address topics such as spill prevention and response, preventive maintenance, good housekeeping, storage practices, visual inspections, and recordkeeping and reporting. At a minimum, formal training sessions shall be conducted annually. Topics discussed in the training session and a roster of employees who attend the training sessions are to be recorded and retained in the SWPPP file.

Informal training in the form of one-on-one communications with personnel on the importance of pollution prevention should occur during visual inspections by members of the pollution prevention team. This will allow members of the pollution prevention team to point out potential pollutants to employees and to verify that the information addressed in the training sessions has been communicated effectively to them. The information described in the plan regarding potential pollution sources (Section 2.0) and stormwater management controls/BMPs (Section 3.0) is distributed to all employees whose work influences stormwater or includes a potential pollution source. At a minimum, this includes maintenance personnel, equipment and vehicle operators, and anyone who handles or oversees the transfer of fuel or other granular or liquid materials into and out of the facility. Employee training includes these four core subjects.

- *Good Housekeeping:* Employees are required to maintain a clean and orderly work environment. The routine sweeping of floors and the prompt cleanup of spilled material is discussed. The location of shovels, brooms, absorbents, and any other spill response equipment are identified. Employees are informed to regularly check for leaks, and spills. Housekeeping issues are addressed during regular safety meetings.
- *Spill Prevention and Response:* Employees are made aware of potential spill areas, drainage routes, and to whom a spill should be reported. Specific material handling procedures to avoid spills and response procedures in the event of a spill are also discussed.
- *Loading and Unloading Procedures:* Employees are instructed to provide constant supervision during all outdoor fuel transfer and material handling operations and to ensure that all containers are properly sealed prior to handling.
- *Preventive Maintenance:* Employees are instructed to provide constant care when using equipment to ensure that the equipment is maintained properly.

No other types of materials other than petroleum products and general housekeeping products are anticipated to be maintained or used on site.