

Crofton Ready Mix Concrete Facility
Storm Water Pollution Prevention Plan (SWPPP)

In compliance with:

General Permit No. 00MM9716
National Pollutant Discharge Elimination System
[NPDES]

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July 2010

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I. Introduction

A) SWPPP Purpose

This Storm Water Pollution Prevention Plan (SWPPP) has been developed as a requirement of the National Pollution Discharge Elimination System (NPDES) program for regulating storm water discharge from industrial facilities. Development, proper implementation and dedicated monitoring of the SWPPP will allow the Crofton Ready Mix Concrete Facility to control pollutants and comply with all established regulations. The primary purpose of this SWPPP is to:

- 1) Identify potential sources of pollution that may reasonably be expected to affect the quality of storm water discharges from the site,
- 2) Describe the practices that will be used to reduce pollutants in storm water discharges to assure compliance with the conditions of the Permit, and
- 3) Establish an implementation schedule to ensure that the proposed plan is properly implemented while monitoring the plan's effectiveness in meeting the design goals.

B) SWPPP Content

The following components are included in this SWPPP:

- ◆ Description of the facilities and existing conditions
- ◆ Description of potential storm water contaminants
- ◆ Description of measures to be taken and Best Management Practices (BMPs) to be implemented
- ◆ Description of the monitoring and inspection plan to be implemented
- ◆ Identification of a SWPPP coordinator, SWPPP team members and the responsibilities involved, and
- ◆ Description of the requirements for permit compliance.

II. Facility Description

A) Facility Location

The Crofton Ready Mix Concrete Facility is located at 2801 Conway Road, Odenton Maryland and is within Anne Arundel County boundaries. Figure 1 is a general vicinity map of the area.

B) Site Description

The Crofton Ready Mix Concrete Facility operates on a section of leased land that is part of a larger industrial site owned by Campbell Corporation. The leased site is bordered by a forested area and portions of the Campbell property to the north and additional Campbell property to the south. A large collection pond [known as 'South pond'] is located in south section of Campbell property. West of the facility are additional forested areas and another business site and to the east is an active portion of the Campbell operation. On-site structures include a main office building, a storage garage, batch plant equipment, a propane tank and a fueling area. Figure 2 is a facility sketch of existing conditions, illustrating pertinent on-site structures and includes approximate drainage zone locations, patterns of storm water drainage and locations of discharge points, if any.

C) Site Activities

The Crofton Ready Mix Concrete Facility is classified as code 3273 under the 1987 Standard Industrial Classification (SIC) guidelines and as code 327320 under the 2002 North American Industry Classification System (NAICS). Normal operating hours are 6am to 4pm and there is an average of ten full-time employees on schedule with approximately six to eight trucks operating out of this facility on a regular basis.

D) Existing Drainage and Discharge Conditions

The Crofton Facility can be divided into two core drainage zones. The natural topography in DZ-1 directs drainage to a large settling pond in the southern end of the site. This pond was constructed in the summer of 2002 and acts as a catch basin to prevent runoff from reaching the South pond, on the Campbell property. Although this pond is designed to eliminate discharge, this is the location of outfall 001. A truck washout station is located near the settling pond and ties into the southwestern side of the pond. A stone-lined channel captures runoff along the driveway and directs flow to the settling pond. A secondary washout station is located near the driveway and drains to the stone-lined channel. DZ-2 represents the northern portion of the property and is primarily used for stock and recycling. A small trap is used to catch any loose sediment from DZ-2 before entering a small marsh area where outfall 002 is located. Figure 2 is a facility sketch of existing conditions that depicts typical patterns of storm water drainage and locations of any discharge. The majority of site drainage is generally southward and additional drainage information can be found in Table 1.

There is currently no discharge from this facility and so has been the case since shortly after the settling basin was constructed.

III. Potential Storm Water Contaminants

A) Material Inventory

Table 2 identifies materials that are used, stored or produced on-site that may contribute to storm water pollution. A physical description and the probable stormwater pollutants are included. This SWPPP is focused on limiting the pollution from these sources.

B) Spill and Leak History

There are no records of any spills or leaks of any material in this facility within the past three years.

C) Potential Areas for Storm Water Contamination

The following core areas with potential for storm water contamination were considered in the development of this SWPPP.

- ♦ Truck Loading Area: This area includes a loading system (hopper, conveyor and mixer) and is located adjacent to the main site office. Contamination may occur through leaking trucks and equipment or spills from overloaded trucks.
- ♦ Fueling Station: This area includes a fueling station adjacent to the facility storage garage. Contamination may occur in this area through improper fueling, or leaking trucks and equipment.
- ♦ Storage Garage: This building serves as a storage area for materials such as admixtures and general site materials. Contamination may occur through fluid leaks from stored materials.
- ♦ Parking Area: This area is used for overnight parking of trucks and equipment. Contamination may occur through fluid leaks on trucks and equipment.
- ♦ Old Equipment Storage: Old equipment that is located on site may potentially leak fluid or contaminate stormwater with rust.
- ♦ Truck Washout Area: There are two washout stations on site. Contamination may occur in these areas through an increase of pH in collected waters and potential for increased sediment build-up.
- ♦ Stockpile Materials: Several mounds of stockpile material (sand, stone, etc.) are utilized from an adjacent section of Campbell property. Contamination may occur in these areas through sediment runoff.

Table 1 includes site-specific information regarding storm water pollution potential from these areas.

D) Emergency Contact Information

Any chemical or oil spill will be recorded on standard inspection forms (Appendix A). In the event of an emergency spill, the Maryland Department of the Environment 24 hr Emergency Spill Hotline (410/974/3551) and the National Response Center at (800/424/8802) will be contacted. In the event of a spill situation, a standard spill response procedure will be followed (Appendix B). This procedure and emergency contact information will be visible and readily available in the site office.

IV. Storm Water Management (SWM) Control Measures

This section will detail the SWM control measures that will be implemented to comply with permit requirements. All Best Management Practices (BMPs) used as control measures in this project were selected to meet or exceed State and local requirements. Table 3 contains specific information and a schedule for target implementation of these control measures. Figure 3 is a facility sketch of proposed control measures depicting approximate locations of implementation.

A) Site Evaluation of Existing Control Measures

After a thorough inspection of existing site conditions, a list of appropriate BMPs for pollution prevention was prepared. The primary goal of this SWPPP is to control any sediment runoff that may occur, to monitor and treat any storm water that is being discharged from the site and to reduce the potential for any future contamination to storm water discharge.

Existing site conditions direct drainage to a man-made settling basin in the southern portion of the leased property. This basin was created in 2002 to prevent runoff from entering the existing collection pond located on the Campbell property and referred to as the South pond. This basin was designed with an oversized capacity to ensure that there would be no discharge into the South pond. The Crofton Ready Mix Concrete Facility generates a relatively minimal amount of runoff and this settling pond allows solids to settle to the bottom while evaporation and natural filtration help maintain a stable water level without the potential for discharge. The maximum pond depth is roughly 18' and a sand liner serves as the base layer to support maximum filtration. In the case of a historical rain event there is an emergency spillway on the southern end of the basin that can serve as a discharge pathway if the need arises.

Positive 'housekeeping' tactics and general storage and maintenance procedures are in place but need to be reinforced. Practices such as proper material storage and general site cleanliness need be addressed.

The following is a list of control measures that will be implemented to address the aforementioned concerns and improve environmental awareness at the Crofton Ready Mix Concrete Facility.

B) Implementation of SWM Control Measures

The following is a list of appropriate control measures that will be implemented at the Crofton Ready Mix Concrete Facility:

- ♦ Site Grading: Minor re-grading will be performed throughout the site to ensure that drainage is being directed to the settling basin.
- ♦ Driveway Channel: The existing stone-lined channel along the driveway will be inspected for effectiveness. Appropriate modifications will be made to ensure that runoff is collected and routed to the settling pond.
- ♦ Settling Basin: The existing collection basin in the southern portion of the facility will be thoroughly inspected for potential problems and appropriate measures will be taken to ensure it is functioning as designed.
- ♦ Fueling Station: All fuel tanks and the containment pad associated with the fueling station will be inspected for potential leak hazards and any changes will be implemented immediately. A spill kit has been installed in this location for use in the event of a spill situation.
- ♦ Material Storage: Any fluid canisters (truck oil, grease) housed on-site will be kept out of contact with storm water and will remain covered when not in use. Any partially used, bagged material will be transferred to a sealable container and properly labeled. Items such as brooms, dust pans, plastic gloves, kitty litter and extra sealable containers will be on-site at all times.
- ♦ Equipment Inspections: Vehicles and equipment will be inspected for fluid leaks and any other potential pollutants to storm water. All vehicles and equipment will receive regular preventative maintenance to reduce the chance of fluid leakage.
- ♦ General Housekeeping: General good housekeeping measures will be implemented into a routine schedule to promote site compliance.

V. Facility Monitoring Plan

A) Routine Inspections

EcoDepot has been contracted by Chaney Enterprises to implement the CEEIP at the Crofton Facility. The program includes monthly inspections of the site to ensure compliance with the NPDES permit guidelines. The truck washout area, the fueling station, material storage areas and all other pollution prevention implementations are inspected for effectiveness. Any potentially non-compliant issues are discussed with the site manager and brought to the attention of Chaney management through site visit summaries that are prepared after each visit.

B) SWPPP Updates and Amendments

Any changes to operating conditions of the Crofton Ready Mix Concrete Facility that require modification of existing BMPs or implementation of new BMPs will be recorded in the on-site file for insertion into an updated SWPPP and submitted with the annual compliance assessment (discussed in Section VII.D). This SWPPP shall be amended to include any change in design, construction, operation, or maintenance of the facility that has a significant effect on the potential for the discharge of pollutants to surface waters

and that has not been addressed in the normal implementation of the SWPPP. This SWPPP shall also be updated whenever it is found to be ineffective in meeting the requirements of the NPDES Permit and any other applicable regulatory guidelines. In the event that the Maryland Department of the Environment (MDE) notifies the SWPPP Coordinator that the SWPPP does not meet one or more of the provisions of the NPDES Permit or any other applicable regulatory guidelines, changes will be made within a timeframe approved by the MDE.

VI. SWPPP Implementation Task Force

A) SWPPP Coordinator

The SWPPP Coordinator is the Land Development Manager and can be reached at 301.932.5000.

B) SWPPP Coordinator Responsibilities

The SWPPP Coordinator will be responsible for the following:

- ◆ Manage the SWPPP team in the implementation of the SWPPP plan,
- ◆ Assign inspection duties,
- ◆ Oversee employee training,
- ◆ Ensure regulatory compliance of site activities,
- ◆ Measure overall effectiveness of SWPPP implementation and
- ◆ Address any site operation changes with appropriate SWPPP modifications.

C) SWPPP Implementation Task Force Team Members

The following team members will assist the SWPPP Coordinator in all aspects of the SWPPP implementation:

- ◆ Plant Manager - 301/261/3327
- ◆ EcoDepot – 443/304/3317

D) EcoDepot, LLC – Environmental Consultants

EcoDepot, LLC will provide consulting on environmental issues relating to the Crofton Ready Mix Concrete Facility. Guidance for all aspects of this P3 Plan and its implementation will be provided as well as on-site support for any environmental concerns. EcoDepot will obtain the necessary monitoring data required on Discharge Monitoring Reports (DMRs) and will manage form submission for NPDES compliance.

VII. Compliance Requirements

A) On-Site Record Retention

A copy of this or any updated version of this SWPPP will be retained in the on-site office for five years from the date of approval. Copies of completed inspection forms will also be kept on-site for reference purposes. Additionally, all employee training records and certifications shall be made readily available.

B) Employee Training

An annual environmental education seminar will be incorporated into ongoing employee training protocol to educate employees about the pollution prevention issues relating to this SWPPP. EcoDepot, LLC will be utilized as a consultant to assist with the training seminar. Employees will be introduced to the requirements of the SWPPP and will be instructed on how to monitor the implemented BMPs for maximum effectiveness. A site walk through will be conducted to illustrate proper good-housekeeping measures in action and to identify what employees should look for to reduce pollution potential. Hands-on demonstrations will be used as a training tool to inform employees of procedures to follow when responding to a spill situation. Appendix D contains a copy of the sign-in sheet that will be used at the seminar to record attendees. Prior to the seminar, the SWPPP Coordinator (or designated SWPPP team member) will evaluate the environmental education program to verify its effectiveness, implement any appropriate changes and complete an evaluation form. A sample evaluation form can be found in Appendix E.

C) Implementation Schedule

A proposed schedule for the implementation of this SWPPP can be found in Table 3. An implementation schedule for E&S Controls and BMPs is shown in Table 4. These schedules will be modified if there is any change to the sequence or expected completion dates and updated schedules will be inserted into the SWPPP file.

D) Annual SWPPP Compliance Assessment

The SWPPP Coordinator (or designated SWPPP team member) will conduct an annual compliance assessment to ensure that the facility is complying with all requirements detailed in this SWPPP. All BMPs and E&S controls said to be in place will be inspected, adherence to the implementation schedule will be verified and a confirmation of an active employee training program will be made. An assessment form will be completed and a copy of the assessment will be submitted to EcoDepot for filing in the EcoDepot SWPPP Monitoring Program Database. A sample assessment form can be found in Appendix F.

E) Corporate Certification

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

Name

Date

Company

Title

FIGURE 1

GENERAL VICINITY MAP

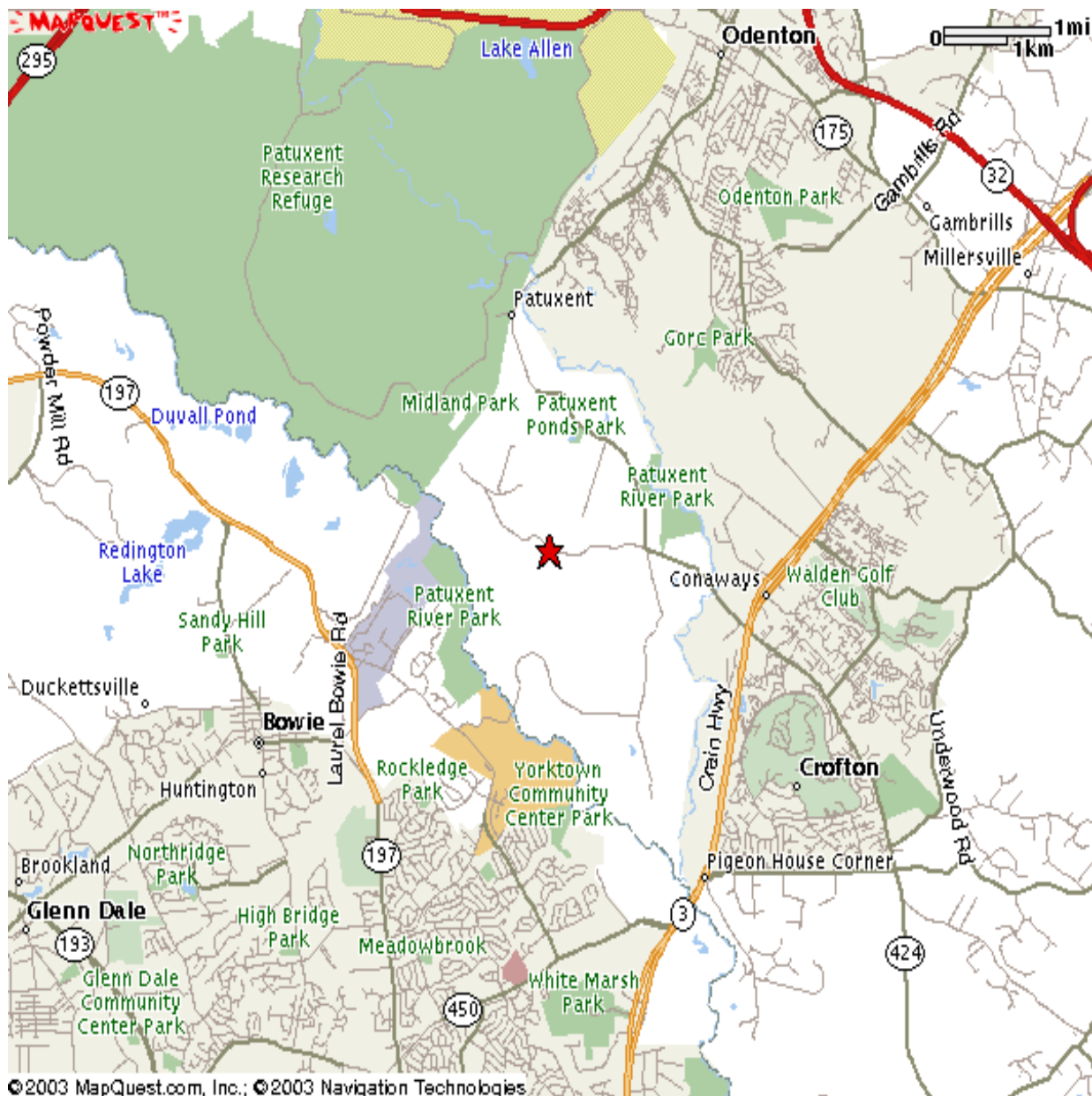


FIGURE 2

FACILITY SKETCH OF EXISTING CONDITIONS

TABLE 1

EXISTING STORM WATER DRAINAGE and DISCHARGE POINTS

DRAINAGE ZONE/ DISCHARGE POINTS	STORM WATER DRAINAGE DESCRIPTION	POTENTIAL POLLUTANT	POTENTIAL PROBLEMS
<i>DZ-1</i>	Facility drainage is directed to a large settling basin in the southern portion of the site. A stone-lined channel collects runoff near the driveway and natural topography directs water to the pond throughout the rest of the site.	Gasoline, Diesel Fuel, Hydraulic Oils/Fluids, Sediment	Diesel fuel/fluids may leak from trucks and equipment. High pH water may be discharged without being treated. Improper loading may result in sediment discharge. Overflow from collection basin may result.
<i>DP-1</i>	There is currently no discharge from this facility as has been the case since the settling pond was constructed. The pond was designed with an oversized water holding capacity so that collected water would be allowed to settle and filter out while never threatening to be discharged.	Diesel Fuel, Hydraulic Oils/Fluids, Sediment, Concrete	Discharge water with high pH is the main concern in this area. Trucks release washout water that could potentially be discharged before being treated.

TABLE 2**MATERIAL INVENTORY**

TRADE NAME MATERIAL	PHYSICAL DESCRIPTION	STORM WATER POLLUTANTS
<i>Cleaning solvents</i>	Colorless, blue, or yellow-green liquid	Perchloroethylene, methylene chloride, trichloroethylene, petroleum distillates
<i>Fertilizer</i>	White or gray granular particles	Nitrogen, Potassium, Phosphorus
<i>Waste Water</i>	Clear or gray	Oil, grease, concrete
<i>Concrete</i>	White or gray solids	Limestone, sand
<i>Sand, Gravel</i>	Solid particles	Silicon, suspended solids, turbidity, sediment
<i>Hydraulic oil/fluids</i>	Brown oily petroleum hydrocarbon	Mineral oil
<i>Gasoline</i>	Colorless, pale brown or pink petroleum hydrocarbon	Benzene, ethyl benzene, toluene, xylene, MTBE
<i>Diesel Fuel</i>	Clear, blue-green to yellow liquid	Petroleum distillate, oil & grease, naphthalene, xylenes
<i>Kerosene</i>	Pale yellow liquid petroleum hydrocarbon	Coal oil, petroleum distillates
<i>Antifreeze/coolant</i>	Clear green/yellow liquid	Ethylene glycol, propylene glycol, heavy metals (copper, lead, zinc)

TABLE 3

SWPPP IMPLEMENTATION SCHEDULE

SWPPP FEATURE	TARGET IMPLEMENTATION DATE*
<i>Bi-monthly facility inspections</i>	January 2004
<i>Implementation of SWM Control Measures</i>	See TABLE 4
<i>Employee Training Program</i>	Date of environmental seminar: Annually General employee instruction: January 2004
<i>Environmental Education Program Evaluation</i>	To be completed prior to program date
<i>Annual Compliance Assessment</i>	January 2005 and annually thereafter

*Dates to be adjusted upon SWPPP approval and MDE recommendations

TABLE 4

SWM CONTROL MEASURES IMPLEMENTATION SCHEDULE

FACILITY SITUATION	SWM CONTROL MEASURE	TARGET IMPLEMENTATION DATE*
<i>Site Grading</i>	Inspect site for locations that may need to be re-graded to ensure proper drainage to the settling pond.	No later than March, 2004 [ongoing]
<i>Driveway Drainage Channel</i>	Inspect channel for effectiveness.	Completed February 14, 2004
	Replace any necessary stone.	Completed April 1, 2004 [ongoing]
<i>Settling Pond</i>	Inspect pond for effectiveness and determine if it is functioning as designed.	Completed/approved March 1, 2004
	Install Black Willow (<i>Salix nigra</i>) live stakes along any eroded section of embankment for bank stabilization and erosion control.	Completed March 14, 2004
<i>Fueling Stations</i>	Install spill kit at fueling station.	Completed March 1, 2004
	Emergency Contact information will be posted.	Completed
	Inspect fuel tank and containment base for cracks/leaks.	Completed February 14, 2004 and monthly thereafter
<i>Material Storage</i>	All material/fluid containers will be inspected for leaks.	Monthly
	Cleaning tools (broom, dustpan, mop, rubber gloves, kitty litter, saw dust, etc.) will be purchased and stored safely in a convenient location.	Monthly
	Any partially used materials will be transferred to sealable containers and properly labeled.	Immediately
<i>Equipment Inspections</i>	On-site vehicles and equipment will be thoroughly inspected for fluid leaks and other potential pollutants.	Monthly
	Preventative maintenance will be performed on a regular schedule.	Monthly
<i>General Housekeeping</i>	Aggressive enforcement of good housekeeping measures will be implemented.	Immediately

APPENDIX B

EMERGENCY CONTACT INFORMATION

**IN THE EVENT OF A SPILL ...
CONDUCT THE FOLLOWING STEPS:**

- 1. LOCATE SPILL KIT**
- 2. CONTAIN SPILL**
- 3. CONTACT THESE AGENCIES:**

MDE 24 HR EMERGENCY SPILL HOTLINE

(410) 974 -3551

NATIONAL SPILL RESPONSE CENTER

(800) 424 - 8802

APPENDIX D

ENVIRONMENTAL EDUCATION SEMINAR EVALUATION FORM

PROGRAM FEATURE	APPLICABLE ? (Y/N)	COMMENTS
Has a date been established for the annual seminar?		
Will all state and federal regulations be addressed?		
Will employees be informed of any changes to the SWPPP?		
Will there be any outside sources involved in the training program? (i.e. presentation or speaker)		
Did the facility staff appear more informed after last year's program?		
Have there been any employee comments/suggestions?		
<p>Name: _____ Date: _____</p> <p>Signature: _____</p> <p>Title: _____</p>		

APPENDIX E

SWPPP COMPLIANCE ASSESSMENT FORM

SWPPP FEATURE	Y/N	COMMENTS
Have bi-weekly inspections been conducted and have forms been completed and submitted to EcoDepot?		
Have daily pH readings been taken and been have logs been completed and submitted to EcoDepot?		
Have BMPs been implemented and has the implementation schedule been adhered to?		
Has employee training been implemented?		
Has the Environmental Education Program been evaluated and forms submitted to EcoDepot?		
Have any changes to site function been addressed in the SWPPP?		
<p>Name: _____ Date: _____</p> <p>Signature: _____</p> <p>Title: _____</p>		