

Final

HAMMOND DEPOT STORM WATER POLLUTION PREVENTION PLAN



YOU ARE THE KEY

**Defense Logistics Agency
Strategic Materials**

**Hammond Depot
Hammond, Indiana**

Updated By:

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This Storm Water Pollution Prevention Plan was prepared for:

**Defense Logistics Agency
Strategic Materials**



April 2013

TABLE OF CONTENTS

	Page
ACRONYMS.....	iv
SECTION 1 INTRODUCTION.....	1-1
1.1 PURPOSE OF THIS STORM WATER POLLUTION PREVENTION PLAN	1-1
1.1.1 SWPPP REVISIONS.....	1-1
1.2 WHAT IS STORM WATER?	1-1
1.3 WATER (OR HYDROLOGIC) CYCLE	1-2
1.4 STORM WATER CONVEYANCE.....	1-3
1.4.1 EFFECTS OF INCREASED URBANIZATION.....	1-3
SECTION 2 STORM WATER REGULATION	2-1
2.1 REGULATORY REQUIREMENTS	2-1
2.1.1 PHASE I.....	2-1
2.1.2 PHASE II.....	2-1
2.1.3 HAMMOND DEPOT’S SPDES PERMIT	2-2
2.1.4 SPDES PERMIT REGULATIONS	2-3
2.2 SIGNIFICANT SPILLS AND LEAKS.....	2-3
2.2.1 ACTION FOLLOWING A SIGNIFICANT SPILL.....	2-4
2.2.2 OTHER SPILLS AND LEAKS	2-4
2.3 WHY DO WE DO THIS? – OBJECTIVES OF THE SWPPP	2-6
2.4 YOU ARE THE KEY.....	2-6
2.4.1 THE SWPPP NEEDS YOUR HELP	2-7
2.5 TRAINING.....	2-7
2.5.1 EXISTING TRAINING	2-7
2.5.2 ADDITIONAL TRAINING REQUIRED.....	2-8
2.6 INTERNET ACCESS.....	2-8

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TABLE OF CONTENTS (CONTINUED)

SECTION 3 HAMMOND DEPOT	3-1
3.1 HAMMOND DEPOT	3-1
3.1.1 LOCATION AND SITE DESCRIPTION.....	3-1
3.1.3 FLOODPRONE AREAS OF THE DEPOT.....	3-6
3.1.4 STORM WATER RUNOFF CONTAMINATION	3-7
3.2 POLLUTION PREVENTION TEAM	3-7
3.2.1 PPT ORGANIZATION.....	3-7
3.3 FORMS.....	3-7
3.4 AREAS OF CONCERN.....	3-9
3.4.1 BMPS AT AREAS OF CONCERN.....	3-12
3.5 RECORDKEEPING AND REPORTING.....	3-12
SECTION 4 BEST MANAGEMENT PRACTICES.....	4-1
4.1 EXISTING SOURCE CONTROLS.....	4-ERROR! BOOKMARK NOT DEFINED.
4.2 OTHER POTENTIAL BMP'S	4-3
4.2.1 MATERIALS MANAGEMENT	4-3
4.2.2 STRUCTURAL BMPS	4-4
4.2.3 MAINTENANCE OF RETENTION PONDS	4-5
4.2.4 CONSTRUCTION ACTIVITIES	4-5
SECTION 5 NON-STORM WATER ASSESSMENT.....	5-5
5.1 NON-STORM WATER DISCHARGES	5-5
5.2 AUTHORIZED NON-STORM WATER DISCHARGES AT HAMMOND DEPOT	5-7
5.3 INSPECTION OF STORM WATER DRAIN INLETS	5-7

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**TABLE OF CONTENTS
(continued)**

Page

LIST OF TABLES

Table 2.1 Reportable Quantities (RQ) of Hazardous Substances	2-4
Table 3.1 Pollution Prevention Team	3- 7
Table 3.2 Outdoor Commodity Stockpiles	3-13
Table 3.3 Miscellaneous Materials Stored Outdoors.....	3-13

LIST OF FIGURES

Figure 3-1 Site Location Map.....	3-3
Figure 3-2 Hammond Depot Map.....	3-4
Figure 3-3 Area A Detail Map.....	3-5

LIST OF APPENDICES

APPENDIX A SPILLS AND LEAKS FORM

APPENDIX B ANNUAL SITE COMPLIANCE REPORT

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ACRONYMS

AOC	AREA OF CONCERN
BMP	BEST MANAGEMENT PRACTICE
CERCLA	COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT
CSWMP	CONSTRUCTION STORM WATER MANAGEMENT PLAN
CWA	CLEAN WATER ACT
DLA	DEFENSE LOGISTICS AGENCY
ESOH	ENVIRONMENTAL, SAFETY AND OCCUPATIONAL HEALTH
ESOHMS	ENVIRONMENTAL, SAFETY AND OCCUPATIONAL HEALTH MANAGEMENT SYSTEM
GSA	GENERAL SERVICES ADMINISTRATION
HWMP	HAZARDOUS WASTE MANAGEMENT PLAN
IDEM	INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ISCP	INSTALLATION SPILL CONTINGENCY PLAN
MEP	MAXIMUM EXTENT PRACTICABLE
MS4	MUNICIPAL SEPARATE STORM SEWER SYSTEM
NOI	NOTICE OF INTENT
NPDES	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
OSHA	OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
POC	POINT OF CONTACT
PPT	POLLUTION PREVENTION TEAM
RCRA	RESOURCE CONSERVATION AND RECOVERY ACT
RQ	REPORTABLE QUANTITY
SPCC	SPILL PREVENTION, CONTROL AND COUNTERMEASURE
SPDES	STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM
SWPPP	STORM WATER POLLUTION PREVENTION PLAN
USEPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
USGS	UNITED STATES GEOLOGICAL SERVICE

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SECTION 1

INTRODUCTION

1.1 PURPOSE OF THIS STORM WATER POLLUTION PREVENTION PLAN

The purpose of this manual is to remind you, the Defense Logistics Agency (DLA) Strategic Materials' employee, that *you* are the key to storm water pollution prevention. This manual will provide you with guidance on how to satisfy this Storm Water Pollution Prevention Plan (SWPPP) for the Hammond Depot. The key elements that you will need to complete are as follows:

- Each year during the third quarter (April through June) the Pollution Prevention Team (PPT, as identified on Table 3.1) will meet and review the items listed on Table 3.1.
- The Spills and Leaks Form (Appendix A) will be submitted to Chief Environmental Management Division by June 30 of each year.
- By the end of the third quarter, the team will complete the Annual Site Compliance Report (Appendix B) and submit it to the Environmental Management Division by June 30 of each year.
- During the course of each year, annual general storm water training will be provided for all personnel during one monthly safety meeting. This training will be prepared for you and will be provided on CD-ROM for your use.

1.1.1 SWPPP Revisions

This SWPPP is a “living document.” It will require periodic updates, the addition of data, the appending of reports, and other modifications. Whenever there is a change in facility operations, such as sources of pollution or control measures, which have the potential to impact storm water quality, the SWPPP must be updated in a timely manner to reflect these changes.

1.2 WHAT IS STORM WATER?

Storm water can be defined as precipitation runoff, snow melt runoff, and surface runoff and drainage. Although it may seem obvious, heavy rains and melting snow can significantly increase the amount of storm water flowing into natural watercourses, such as rivers and lakes, or man-made distribution systems, such as canals and sewer systems. However, other factors also influence storm water runoff. Principal factors directly influencing storm water runoff include the following:

- **Rainfall duration** – Even a light rain can saturate soil and result in storm water runoff, resulting in the generation of runoff more quickly.
- **Rainfall intensity** – Heavy rain will saturate the soil more quickly than a light rain. The result is soil with less capacity to hold water, creating surface runoff.
- **Moisture in soil** – Soil that is already moist will result in runoff being generated sooner than would be the case for dry soil because dry soil has a greater capacity to absorb rainfall. Frozen soil can result in all of the rain that falls or snowmelt to run off the ground surface as sheetflow.

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- **Soil composition** – Hard clay soils absorb little water, while sandy soils easily allow water to flow through.
- **Vegetative cover** – Roots, layers of leaves, branches, and pine needles (*i.e.*, ground cover) readily allow water to soak into the soil. Barren surfaces tend to increase storm water runoff.
- **Ground slope** – The rate of storm water flow on flat land is typically slow, with enough time for the water to infiltrate into the soil, whereas water that falls on steeply-sloping land tends to rapidly run downslope without time for infiltration.
- **Human influences** – Human activities have a definite impact on storm water runoff. Impervious surfaces (*i.e.*, surfaces that do not absorb water), such as building roofs, paved roads, and parking lots, greatly increase the amount of runoff. Bare soils from construction activities and some agricultural land uses also result in increased amounts of storm water runoff being generated.

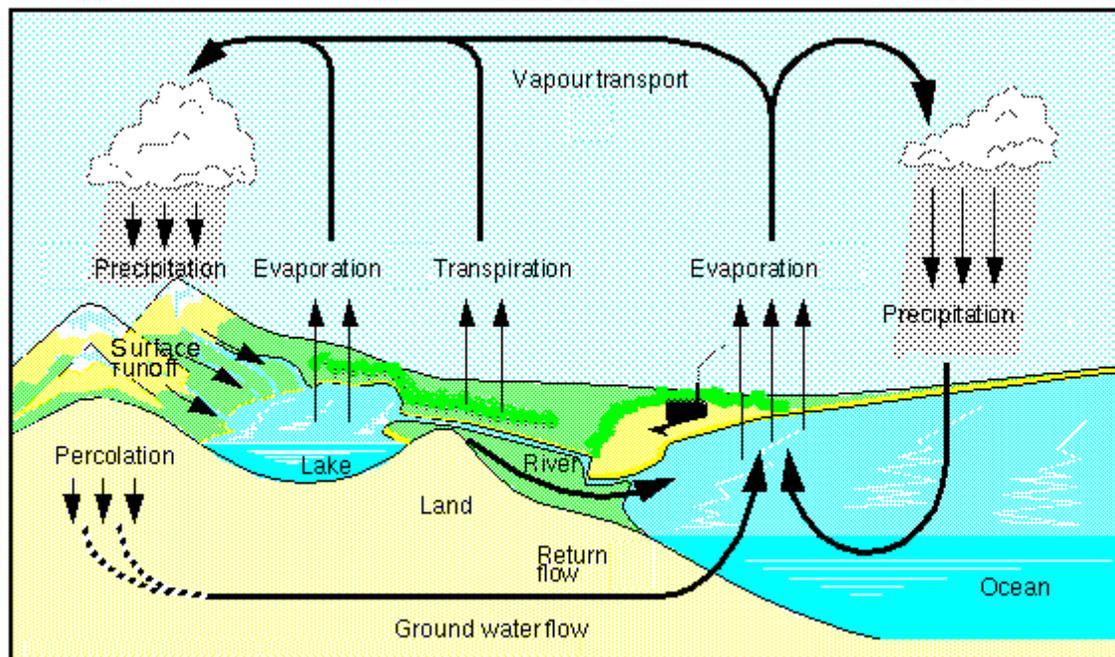


1.3 WATER (OR HYDROLOGIC) CYCLE

Water in and on the earth moves in a continuous cycle. This is called the Water (or Hydrologic) Cycle. As water evaporates from oceans and lakes, vapors rise and condense into clouds. The clouds then move over land and precipitation (water) falls in the form of rain, ice, or snow. The water travels through the soil (called infiltration or percolation) and recharges the groundwater or travels overland to fill in streams and rivers, eventually flowing back into the oceans and lakes where evaporation starts the process anew. Storm water runoff is a part of this process. Figure 1.1 illustrates the Water Cycle.

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Courtesy Erich Roeckner, Max Planck Institute for Meteorology

Figure 1.1 The Water Cycle

1.4 STORM WATER CONVEYANCE

Beginning in the mid-1800's, storm water conveyance systems were constructed in cities and developed areas throughout the world. These systems often consisted of ground surface drain inlets emptying into buried pipes or tunnels. Storm water flowed into the underground systems, carrying with it whatever sediment, oil, grease, toxics, pathogens, and other pollutants that were present on the streets above.

The conveyance systems usually consisted of pipes or tile tunnels with impervious sides and bottoms, so all the storm water and collected pollutants were carried directly to a point of discharge (or outfall), such as a nearby river, lake, or ocean.

It is uncommon for storm water in a collection system to be treated (or cleaned) before discharging into a body of water. Some municipal storm water systems are combined with a sanitary wastewater sewage system, and the combined storm water and wastewater are processed at a treatment facility. However, these combined systems can easily be overwhelmed during heavy rain, causing the system to overflow and resulting in untreated storm water and sewage being released into the environment.

1.4.1 Effects of Increased Urbanization

As populations grow, cities and suburban areas expand, resulting in the creation of more paved and impervious surfaces, such as buildings, roads, driveways, and parking areas. Some effects of this increased urbanization and the proliferation of impervious surfaces are listed below:

- Decreased infiltration of storm water into the ground

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- Reduced land area for groundwater recharge
- Contamination of and decrease in subsurface flow
- Increased erosion
- Increase of sediment and pollutants introduced into waterways
- Increased storm water runoff
- Acid rain



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SECTION 2

STORM WATER REGULATION

2.1 Regulatory Requirements

Storm water regulations are covered in the following sections.

2.1.1 Phase I

Federal storm water regulations were first issued in 1990. Under Phase I of the storm water program, the United States Environmental Protection Agency (USEPA) regulations focused on the use of National Pollutant Discharge Elimination System (NPDES) and State Pollutant Discharge Elimination System (SPDES) permit coverage to address storm water runoff from “medium” and “large” municipal separate storm sewer systems (MS4s), direct industrial storm water discharges, and construction activity impacting five or more acres of land.

A SPDES permit has not been issued to the Hammond Depot, as the State of Indiana regulations exempt the facility from coverage. In accordance with our policy, this SWPPP has been developed.

2.1.2 Phase II

Phase II of USEPA’s storm water program was published in 1999 and expanded the NPDES program to cover “small” MS4s in urban areas, as well as small construction activities between one and five acres in size. MS4s are “municipal” separate storm sewer systems that convey only storm water. The definition of “municipal” generally includes federal facilities, such as storage depots. However, these facilities are covered only if they have, among other criteria, a separate storm water system (rather than a combined storm water and sanitary wastewater sewer system) and are located in an “Urbanized Area,” which is defined as an area that includes a total population of at least 50,000 and a population density of at least 1,000 people per square mile.

Implementation of USEPA storm water regulations is dependent on most individual states issuing general permits covering MS4s. In Indiana, regulated MS4 facilities must file a Notice of Intent, (NOI) in order to receive a SPDES general permit. Once covered, regulated facilities normally have up to five years to fully implement a storm water management program. These programs must be designed to reduce the discharge of pollutants to the “maximum extent practicable” (MEP) to protect water quality.

The Hammond Depot is within an Urbanized Area as defined by the Census Bureau and is potentially subject to the Phase II regulations. However, the Indiana regulations appear to have exempted the facility from coverage under the Phase II regulations because the on-site storm water conveyance system serves a population of less than 1,000 and the site has not been designated for coverage by IDEM. Furthermore, the IDEM indicates that covered facilities were contacted in December 2002, and, reportedly, no notification was made to the facility. The facility could be designated in the future and, if so, will have 365 days to submit the required information to IDEM.

This SWPPP has been prepared to conform with Phase II requirements to the extent possible. Specific procedures being implemented at Hammond are noted as follows:

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- **Illicit discharge detection and elimination** – Sometimes connections of sanitary sewer lines are illegally made to storm water systems, greatly increasing concentrations of pollutants in storm water. Phase II requires the elimination of these connections. Section 5 of this plan discusses the assessment of non-storm water discharges and illicit connections with respect to the Hammond Depot.
- **Construction site runoff control** – Land stripped of vegetative cover will increase the amount of runoff, as well as the sediment load contained in that runoff. Phase II requires the development of a construction site ordinance, but an ordinance has not been developed for the Depot. Any construction projects undertaken at the Hammond Depot will include provisions for storm water management and erosion control and mitigation of impacts.
- **Post-construction runoff control** – Many techniques exist that can be implemented to reduce the amount of storm water that enters a drainage system and increase the amount that infiltrates into the ground. Post-construction measures and controls must be developed as part of Phase II. As mentioned above, any construction projects at the Hammond Depot will include provisions for storm water management and erosion control to minimize impacts, both during and post-construction.
- **Pollution prevention/good housekeeping** – steps taken by facility/property occupants to minimize the amount of pollutants discharged from industrial areas into storm water systems. The Hammond Depot has implemented a series of best management practices (BMPs) designed to protect storm water quality (Section 4).

As new construction is not anticipated at the Depot, a Construction Storm Water Management Plan (CSWMP) has not been included as part of this SWPPP (as would be required under Phase II). In the event that a construction project one acre or more in size is planned, a CSWMP must be prepared and appropriate BMPs developed and implemented.

2.1.3 Hammond Depot's SPDES Permit

Since it is not required by the IDEM Office of Water Quality, a Phase II Rule 6 general storm water permit has not been issued by IDEM to the Hammond Depot, and an NOI form has not been filed by the Depot.

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2.1.4 SPDES Permit Regulations

To comply with provisions of our stormwater plan, the depot is required to do the following:

- Perform an annual review by completing the Annual Site Compliance Report and the Spills and Leaks Form, both located in Appendix A. (The Spills and Leaks Form should be completed whenever there is a spill, not necessarily only once per year). Directions and forms for completing the Annual Site Compliance Report are provided in Appendix B.
- Update this SWPPP whenever conditions change, such as materials becoming exposed to or removed from exposure to storm water runoff, as noted during inspections or otherwise.

2.2 SIGNIFICANT SPILLS AND LEAKS

Significant spills and leaks of toxic or hazardous pollutants that occur in areas exposed to precipitation or that otherwise drain to a storm water conveyance at the facility must be reported as soon as possible. Spills and leaks occurring over the past three years prior to the effective date of this SWPPP are to be documented in this SWPPP. This list must be updated, as appropriate, during the term of the permit. No spills or leaks have been reported at the Hammond Depot in the three years prior to April 10, 2013.

USEPA has defined “significant spills” to include releases within a 24-hour period of hazardous substances in excess of reportable quantities (RQ) under the Clean Water Act (CWA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Reportable quantities are set amounts of substances in pounds, gallons, or other units.

Substances present at the Hammond Depot and the corresponding RQs are provided in Table 2.1. These RQ’s are applicable only to CERCLA regulations; smaller quantities of spilled substances may be reportable to other state agencies.

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Table 2.1		
Reportable Quantities (RQ) for Hazardous Substances at Hammond Depot		
Substance	Component(s)	RQ (gallons)
Diesel Fuel	(Product exempt from CERCLA reporting requirements)	
Unleaded Gasoline ^a	Benzene ^a	76
Unleaded Gasoline With Ethanol ^a	Benzene ^a	76

^a Other substances with RQs are present in gasoline, but benzene has the lowest RQ and would trigger reporting requirements. The CERCLA RQ for benzene is ten pounds.

2.2.1 Action Following a Significant Spill

If a hazardous substance listed in Table 2.1 is released to the environment in excess of the RQ, the depot is required to notify the National Response Center at (800) 424-8802 as soon as possible. Releases are defined to include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment. Simply put, a release is when a material gets out of its designated container into the environment.

In the event a hazardous substance is spilled that is not included on Table 2.1, the product’s Material Safety Data Sheet (MSDS) should indicate the RQ, if applicable. An extensive listing of RQs is also available on the USEPA website at <http://www.epa.gov/ceppo/pubs/title3.pdf> . Materials are listed alphabetically by chemical name and also by Chemical Abstracts Service (CAS) Registry Numbers[®]. Calculations may be required to determine the RQ of a product if individual components of a product are considered a hazardous material.

All significant spills and leaks of toxic or hazardous pollutants that have occurred in the past three years prior to the date of this SWPPP must be reported on the Spills and Leaks Form, included in Appendix A. Spills and leaks of toxic and hazardous pollutants should be handled in accordance with precautions and procedures recommended on the MSDS and should be reported immediately to the Distribution Facilities Manager. In any event, immediate measures should be taken to stop or remove the source of the spill, and to stop or prevent further migration. Any release of a fuel, oil or oil product must also be documented, and handled in accordance with the Spill Prevention, Control and Countermeasure (SPCC) plan for the depot.

2.2.2 Other Spills and Leaks

Spills and leaks of toxic and hazardous pollutants not considered “significant spills” should be handled in accordance with precautions and procedures recommended on the product’s MSDS, and should be reported immediately to the Distribution Facilities Manager. In any event, immediate measures should be taken to stop or remove the source of the spill, and to stop or prevent further migration of the spill.

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2.3 WHY DO WE DO THIS? – OBJECTIVES OF THE SWPPP

The purpose of the storm water pollution prevention plan is to minimize or eliminate the potential for contamination of storm water by our activities. The plan addresses physical changes that could be made at our facilities to minimize or eliminate the potential for the contamination of storm water runoff. The plan is also intended to investigate sources of potential contamination, develop on-going practices and procedures for minimizing or eliminating storm water pollution, and implement those practices and procedures.

The primary objectives of this SWPPP are as follows:

- Identify and characterize potential sources of storm water pollution
- Select and design BMPs to be implemented for control of pollution sources
- Develop a program of continuing inspection, maintenance, and monitoring to facilitate reduction or elimination of storm water pollution.



2.4 YOU ARE THE KEY

Our Environmental, Safety and Occupational Health (ESOH) Policy Statement provides the foundation for controlling the environmental impacts of our activities, commodities, and services and establishes environmental goals and objectives. Compliance with this SWPPP and protecting water quality are a part of these goals.

The key elements of the ESOH Policy Statement are as follows:

- Compliance with all relevant environmental, safety, and occupational health laws and regulations and our policies and procedures
- Fostering a dialogue with employees and the public regarding the potential impact of our operations

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- Promoting environmental stewardship through the prevention of pollution
- Supporting efforts to conserve and improve natural resources in the regions in which we operate
- Continually improving our environmental, safety, and occupational health performance through training and integrating environmental, safety, and occupational health considerations for our business planning processes

We have adopted the ESOH Policy Statement and will conduct our business activities and operations in a manner that is consistent with our policy statement.

2.4.1 The SWPPP Needs Your Help

You, the employee, are the key to making this plan effective and keeping the storm water drainage system free of pollutants.

- You are in the best position to protect storm water quality.
- You know your depot.
- You know your job responsibilities and procedures.
- You can make a positive difference by taking the appropriate steps in the event of a spill or emergency.
- You can provide input needed to update and improve the SWPPP.

It is your duty (and every employee's duty) to keep an eye open to identify conditions that may contribute to contamination of storm water runoff. During your daily routine, should you notice a potential problem, take the steps to fix it! Keep the lines of communication open. At your monthly safety meetings, address any concerns you may have about the current status of your SWPPP. If you see a situation that requires immediate action, act responsibly. Fix the problem or contact personnel who can.

Knowledge of any storm water contamination, including that from adjacent property that may share the storm water drainage system servicing the depot, should be brought to the attention of the Distribution Facilities Manager or PPT member (see Section 3.2).

It is the responsibility of every employee to remember that whatever goes down into the storm water system will end up in our local waterways. Often times, that waterway is used for recreation, as a source for food (for example, fish), and as a source for drinking water.

2.5 TRAINING

Employee training is essential to effective implementation of the SWPPP. The purpose of a training program is to teach personnel at all levels of responsibility the components and goals of the Plan. When properly trained, personnel are more capable of preventing spills, responding safely and effectively to an incident when one occurs, and recognizing situations that could lead to storm water contamination.

2.5.1 Existing Training

During the course of each year, general storm water pollution prevention training will be provided for all depot employees during at least one monthly safety meeting.

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2.5.2 Additional Training Required

- All members of the Storm Water Pollution Prevention Team (PPT) will meet annually to discuss the SWPPP. The Team Leader will coordinate the meetings and will update members on new developments regarding federal and Indiana storm water regulations.
- All site POCs will be given a copy of the SWPPP, which will be posted at the site. A PPT member will brief the POC annually on Plan changes and requirements in the form of a written report.
- Team members will receive annual training in storm water pollution prevention and good housekeeping practices.

2.6 INTERNET ACCESS

This SWPPP, along with our ESOH Policy Statement, are available at the website: <https://www.dnsc.dla.mil/iamthekey/login.aspx>.

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SECTION 3

HAMMOND DEPOT

3.1 HAMMOND DEPOT

The Defense Logistics Agency (DLA) Hammond Depot is required to prepare this SWPPP in accordance with the Depot storm water program and the environmental, safety and occupational health management system (ESOHMS).

3.1.1 Location and Site Description

The Depot is located at 3200 Sheffield Avenue in the City of Hammond, Lake County, Indiana. The Depot is located approximately 1,000 feet east of the Indiana-Illinois state line, was constructed in the late 1940's and encompasses approximately 57 acres. The topography of the Depot property is generally flat, and the approximate center of the site is located at 41° 39' 36" north latitude and 87° 31' 40" west longitude.

Overall, land uses in the vicinity of the Hammond Depot are industrial, commercial, and residential. An unnamed pond is located to the south of the Depot, and the discharge from this pond flows along the western perimeter of the Depot property into Wolf Lake, which also borders the Depot to the west. Railroads run along parts of the eastern and southern borders of the Depot property, with undeveloped land to the east and south of the Depot. Wetlands and an elevated section of the Indiana Toll Road lie to the Depot's northeast. The Wolf Lake Industrial Center is located to the north of the Depot on land that was previously part of the Depot property. This chemical/industrial facility is privately owned and includes warehouses and a tank farm that were originally a part of the Depot.

This Depot is operated by the Defense Logistics Agency (DLA) of the United States government. The property is owned by the General Services Administration (GSA). Operations within the Hammond Depot primarily consist of the storage and handling of metal ingots, drums, and piles of metallic and other ores. These materials are stored inside warehouses and outside in open areas.

This SWPPP applies to the current property and the storm water drainage system located on the Depot property. The drainage system also serves a portion of the industrial center to the Depot's north that was formerly a part of the Depot. The industrial area is no longer owned by the DLA and is not covered under this SWPPP.

Maps in this SWPPP depict the Depot, its storm water system, and flood prone areas:

- **Figure 3.1 – Site Location Map.** A topographic map of the site and surrounding vicinity taken from a USGS quadrangle map, showing nearby features including roads, developed areas, bodies of water, and the Depot's boundary.
- **Figure 3.2 – Hammond Depot Map.** Shows the entire Depot with the boundary fence, approximate location of stockpiles and buildings, surface flow direction, Areas of Concern (AOCs – see Section 3.4), storm water retention ponds and drainage system outfalls, and other features.

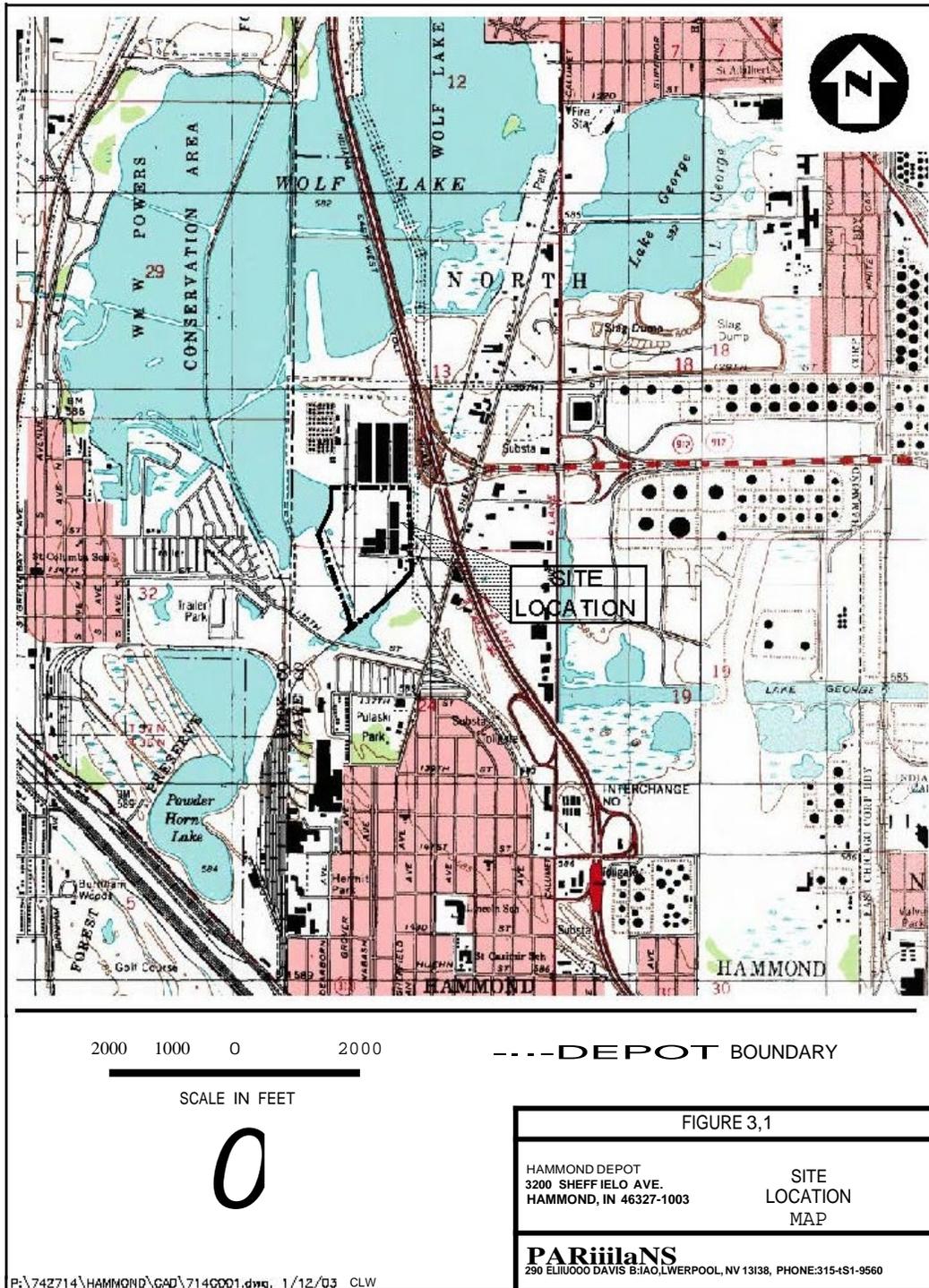
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- **Figure 3.3 – Area A Detail Map.** Indicates the area surrounding the vehicle maintenance building, the aboveground storage tanks (ASTs), and AOCs A-1, A-2, and C.

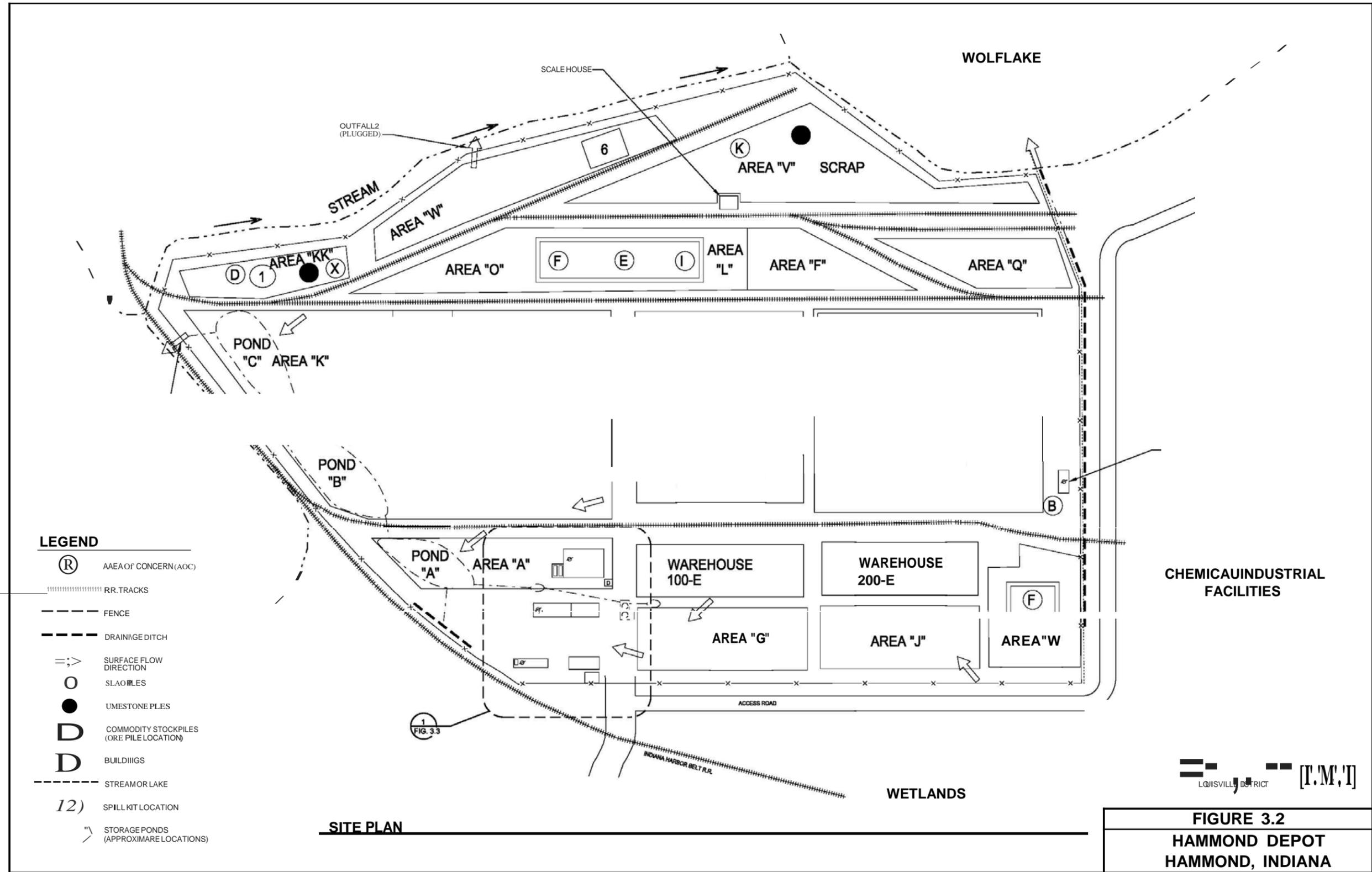
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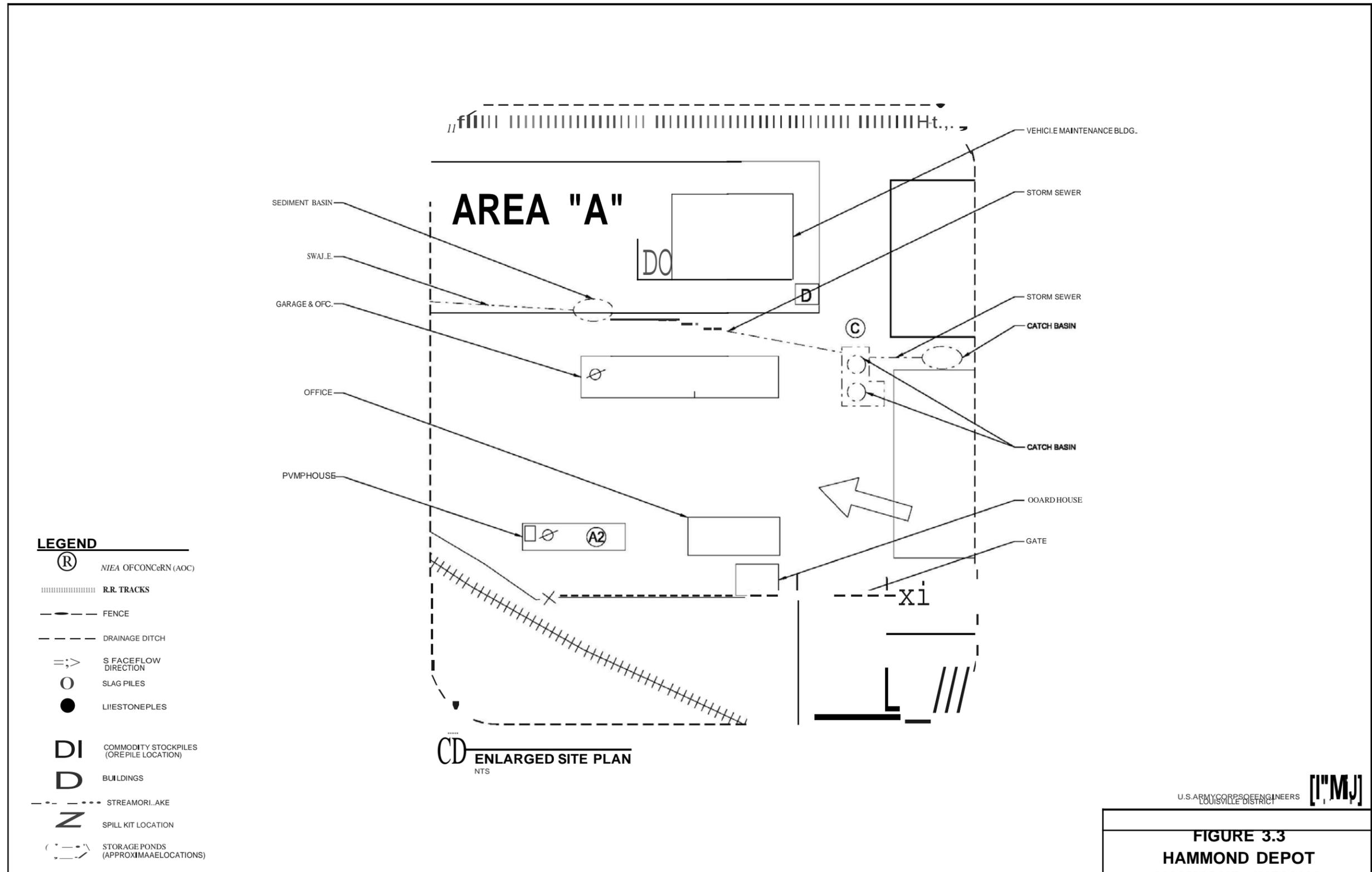
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3.1.2 Storm Water Management System

The storm water drainage system at the Hammond Depot is comprised of three storm water retention ponds, two grass-lined surface swales, and one active outfall discharge point around the perimeter of the property. The storm water drainage system conveys storm water runoff from most areas of the Depot, with contributions from adjacent property. A portion of the runoff from the Depot's roads, rooftops, and stockpiles does not always reach the storm drainage system; rather, it typically infiltrates into the ground or settles into one of several ground depressions or low spots on the Depot property. A storm water collection system was constructed in June 2012 to collect storm water from the area at the southern portion of Area "G" and the southern portion of Building 100-E. The collected water is conveyed to storage pond "A." There are also culvert pipes located at the three outfall discharge locations described below.

Retention Ponds

Three storm water retention ponds were constructed on the south side of the Depot in 2004. Much of the storm water runoff from the Depot flows south to these ponds, which then discharge to Outfall 1. Excavated materials from the pond construction were placed in Area G to raise the surface elevation and prevent flooding in that area. The remaining excavated material was placed in Area F.

Outfall 1

Outfall 1 discharges runoff from the three storm water retention ponds. Storm water runoff discharged through this outfall empties into an unnamed pond located southeast of the Depot. An Indiana Harbor Belt Railroad line separates this pond from the Depot property. Water from this pond discharges through a culvert outlet and into a small stream running along the west fence line of the Depot property, eventually emptying into Wolf Lake. Wolf Lake flows into Lake Michigan, located approximately two miles north of the Depot.

Outfall 2

Outfall 2 was formerly located along the western boundary of the Depot and has been filled in with concrete to prevent storm water runoff from reaching the small stream located along the western boundary of the Depot that discharges into Wolf Lake. Runoff in the vicinity of the outfall is contained in a swale before infiltrating into the soil or flooding nearby low-lying areas.

Outfall 3

Outfall 3 was formerly considered part of the Depot property, but is no longer on Depot property. It receives storm water runoff from a ditch that runs outside the northern fence line of the Depot property, including the Wolf Lake Industrial Center to the north and the wetland areas east of the Depot. The ditch conveys runoff from culverts located east of the Depot on either side of the main access road for the industrial center. At one point, the ditch turns slightly and flows under ground through a culvert, until it discharges through an outfall into Wolf Lake.

3.1.3 Flood prone Areas of the Depot

Following heavy precipitation or snowmelt, there is a potential for minor flooding in the parking lot south of the garage and office. The surface level of the area (Area G) north of the parking lot was raised with materials excavated from the pond construction, causing storm water to flow toward the parking lot where it collects in low-lying areas. A storm water collection system was constructed in June 2012 to collect storm water from the area at the southern portion

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of Area “G” and the southern portion of Building 100-E. This storm water system intercepts much of the pooled water and carries the water to Storage Pond “A.”

3.1.4 Storm Water Runoff Contamination

Any storm water runoff that does not reach the outfall at the Depot gradually infiltrates into the soil, recharging shallow groundwater. Any contamination entering the shallow groundwater may eventually end up in nearby streams and lakes, negatively affecting the quality of water which is a resource for both wildlife and humans. Pollutants entering the groundwater can have a negative effect on human health.

Groundwater is not used for drinking water purposes on the Depot or in nearby communities.

3.2 POLLUTION PREVENTION TEAM

Each SWPPP must identify a specific individual or individuals within the facility organization as members of a storm water Pollution Prevention Team (PPT) that are responsible for developing the SWPPP and assisting the Distribution Facilities Manager in its implementation, maintenance, and revision. The SWPPP shall clearly identify the responsibilities of each team member. The activities and responsibilities of the team shall address all aspects of the facility's SWPPP.

When establishing a PPT, it is vital to identify the key people who are most familiar with the facility and its operations and to provide adequate structure and direction to the facility's entire storm water management program. The PPT concept is flexible and should be molded to conform to the resources and specific conditions of the facility. Specific activities of the team, the number of members, and their background and experience may vary from one Depot facility to another.

3.2.1 PPT Organization

Effective organization of the pollution prevention team is important in order for the team to be able to accomplish the task of developing and implementing a comprehensive SWPPP. There are two important features in organizing a team of this nature:

- Selecting the right individuals to serve on the team
- Establishing good channels of communication

The Hammond Depot PPT is identified in Table 3.1.

In the event that a member of the PPT leaves his/her position at the Depot, a replacement will be named as soon as practical. The most qualified person should be named as the replacement and not necessarily the new individual in the former PPT member’s position.

3.3 FORMS

Appendices A and B contains two forms that will be completed by the PPT:

- Annual Site Compliance Report (Appendix B - completed annually)
- Spills and Leaks Form (Appendix A - completed as required and at least annually)

Directions for completing the Annual Site Compliance Report are located in Appendix B.

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Table 3.1
POLLUTION PREVENTION TEAM
Hammond Depot, Hammond, Indiana

The following Team Members are responsible for developing, implementing, modifying, and providing required reports for the Storm Water Pollution Prevention Plan and related activities.

Member	Responsibilities
<p>Eric Deal, Team Leader, General Supply Specialist (W): (219) 937-5383, ext. 309.</p>	<ul style="list-style-type: none"> · Coordinates all stages of SWPPP development and implementation. · Coordinates employee training programs. · Completes annual site compliance reports. · Conducts or contracts annual inspection and certification of non-storm water discharges, as required. · Administers and oversees all team members' activities. · Coordinates SWPPP updates as needed. · Maintains all records and submits reports, as necessary. · Maintains updated spill records and updates the SWPPP to reflect any spills that occur at the Depot.
<p>Nate Walsko, Member, General Supply Specialist (W): (219) 937-5383 ext. 302</p>	<ul style="list-style-type: none"> · Ensures good housekeeping practices. · Conducts on-site preventative maintenance inspections. · Updates material inventories. · Assists the Team Leader during annual site compliance reports.
<p>Jesse Zuniga, Member, General Supply Specialist, (W): (219) 937-5383 ext. 300</p>	<ul style="list-style-type: none"> · Attends meetings and assists other team members as needed. · Provides input concerning commodity storage and removal that may affect the SWPPP.
<p>Rob Skruck, Member, Environmental Protection Specialist (W): (330) 652-1456</p>	<ul style="list-style-type: none"> · Coordinates activities within Environmental Field Activities Group . · Provides input and information on appropriate BMPs. · Provides annual Storm Water Training. · Ensures that all necessary permits are in place and up to date. · Coordinates any changes in the SWPPP with cognizant contracting and Depot personnel.

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3.4 AREAS OF CONCERN

Any location at the Depot where material is stored in an outdoor location, or where potentially exposed to precipitation and/or storm water runoff, is considered an Area of Concern (AOC), if there is the potential for storm water quality to be impacted. Areas of Concern at the Hammond Depot include the following (Figures 3.2 and 3.3):

A-1 Vehicle fueling station with two aboveground storage tanks (ASTs) located on the south side of the building:

- One 1,000-gallon diesel fuel tank
- One 1,000-gallon gasoline tank

The two tanks are uncovered and situated on a concrete pad surrounded on three sides by a gravel driveway and on the fourth side by the building. Storm water runoff may infiltrate the gravel and nearby grassy areas or settle into low-lying areas subject to flooding in Area A. Runoff may reach the southeastern drainage swale during heavier precipitation events, eventually discharging through Outfall 1.

A-2 Pump House – One 140-gallon diesel AST is located inside the pump house. Contents escaping the containment of this tank and building would discharge through floor drains inside the building to the outside on the grass-covered area west of the pump house building. The discharge would pond on the ground, possibly infiltrating the soil, or could enter the southeastern ditch connected to Outfall 1 were a heavy rainfall event to occur that could transport released material.

B. Contractor Maintenance Building - Vehicle maintenance is performed by contractors inside the Contractor Maintenance Building located in the northern portion of the Depot. On occasion, vehicle maintenance may be performed outside the building. Vehicles include off-road machinery used at the Depot (for example, bulldozers, all-terrain vehicles), but generally not street-legal cars and trucks, which are usually maintained off the site. Runoff from outside of the building infiltrates the nearby gravel and grass-covered surfaces.

C. Solid waste bins (dumpsters) – One solid waste dumpster is located on a blacktop-covered area near the northeast corner of the vehicle maintenance building located south of Warehouse 100E. The bin has a hinged cover that is kept closed, except when in use. Only common office and kitchen-type refuse is allowed in the dumpster. Storm water runoff from this area drains to nearby surfaces and infiltrates into the ground, settles in flood-prone areas, or enters the southeastern ditch connected to Outfall 1 following a sufficient precipitation event. Additional dumpsters placed in locations throughout the Depot may be brought onto the Depot by contractors on a temporary basis.

Commodity Storage - The following AOCs are open areas containing one or more stockpiles of materials. All piles are exposed to precipitation.

Commodities exposed to precipitation are stored on various surfaces, including concrete, gravel, and grass. Runoff from these stockpiles may pick up precipitates from the commodity and may leave a contaminated footprint on an impervious surface. Any runoff that infiltrates into the ground may carry with it precipitates from the commodity and potentially cause contamination of the groundwater. Runoff containing precipitates into the outfalls may also carry these contaminants into the receiving body of water.

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All piles are exposed to precipitation, with storm water runoff infiltrating into the ground or flowing into the retention ponds. Table 3.2 lists each pile's number, Area of Concern, Open Area letter, drainage outfall, stockpile material, approximate pile dimensions, and surrounding surfaces. Storm water runoff infiltrates into the ground or flows into the retention ponds. Quantities of the materials are not available. Materials stored at a given location may change over time. Materials presented in this plan are typical.

- D. Pile No. 1**, Open Area KK – Ferrochrome pile on a blacktop surface
- E. Pile No. 6**, Open Area O – Ferrochrome pile on a concrete surface
- F. Pile No. 7**, Open Area O – Ferrochrome pile on a concrete surface
- G. Pile No. 12**, Open Area E – Ferromanganese pile on a concrete surface
- I. Pile No. 16**, Open Area L - Ferrochrome pile on a concrete surface
- Pile No. 17**, Open Area L – Ferrochrome pile on a concrete surface
- J. Pile No. 19**, Open Area E – Ferromanganese pile on a concrete surface
- K. Pile No. 15**, Open Area V – Ferrochrome pile on a blacktop surface

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**Table 3.2
Outdoor Commodity Storage
Hammond Depot, Hammond, Indiana**

Pile Number	Area of Concern	Open Area Letter	Outfall	Material	Width (feet) ^a	Length (feet) ^a	Height (feet) ^a	Surrounding Surface
1	D	KK	(I)	Ferrochromium, high carbon	70	100	20	On blacktop pad, surrounded by grass and gravel
6	E	O	(I)	Ferrochromium, low carbon	57	65	14	On concrete pad, surrounded by grass and gravel
7	F	O	(I)	Ferrochromium, high carbon	150	225	17	On concrete pad, surrounded by grass and gravel
12	G	E	(I)	Ferromanganese, high carbon	250	300	18	On concrete pad, surrounded by grass and gravel
15	K	V	(I)	Ferrochrome, low carbon	70	70	12	On blacktop pad, surrounded by grass and gravel
16	I	L	(I)	Ferrochrome, low carbon	150	70	15	On concrete pad, surrounded by grass and gravel
17	I	L	(I)	Ferrochrome, low carbon	150	70	15	On concrete pad, surrounded by grass and gravel
18	F	H	(I)	Ferrochromium, high carbon	30	80	12	On concrete pad, surrounded by grass and gravel
19	J	E	(I)	Ferromanganese, high carbon	30	70	10	On concrete pad, surrounded by grass and gravel

a. Width, length, and height are approximate.

(I) = runoff typically infiltrates into soil

n/a = not applicable. Materials stored at a given location may change over time.

**Table 3.3
Miscellaneous Materials Stored Outdoors
Hammond Depot, Hammond, Indiana**

Area of Concern	Location	Material	Pile Diameter (feet) ^a	Pile Height (feet) ^a	Surrounding surface
L	North end Area KK	Limestone	8	4	Blacktop
3	East side Area V	Limestone	5	2	Blacktop
3	East side Area V	Slag	6	5	Blacktop
3	Area V	Cinder blocks	Quantity not known		Grass
3	Area V	Scrap metal, railroad ties	Quantity not known		Grass

^aPile diameter and height are approximate. Materials stored at a given location may change over time.

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3.4.1 BMPs at Areas of Concern

Best management practices are discussed in Section 4. BMPs utilized for the above-mentioned AOCs are detailed on the annual site compliance reports, presented in Appendix B. A brief summary of the BMPs in effect at each Hammond Depot AOC follows:

- **Good Housekeeping** – Materials are stored in clean, well-maintained areas.
- **Spill Prevention and Proper Fluid Disposal** – No spills from the AOCs into the storm water drainage system have occurred; waste fluids are not disposed in the storm water system.
- **Commodity Outloading** – Storm drains and surface water flow pathways in the vicinity of the work area must be blocked using materials such as hay bales.
- **Proper Herbicide and Pesticide Use** – Applications are in compliance with our Pest Management Plan.
- **Illicit Discharge Connections** – There are no illicit discharge connections to the storm water drainage system.
- **Street and Parking Lot Sweeping** – Areas are kept swept and free of debris.
- **Catch Basin and Ditch Cleaning** – Catch basins and ditches are free of debris and proper flow is maintained in ditches.
- **Road Salting and Sanding** – Use of salt or alternative deicing products around storm water drainage pathways is minimized. Areas of sand application are kept clear of major accumulations.
- **Snow Removal** – Snow from around the vicinity of AOCs should be removed to an area where it can melt and infiltrate into the ground.

3.5 RECORDKEEPING AND REPORTING

A typical SPDES permit requires that records of all preventative maintenance inspections, records of employee training sessions, and the annual site compliance report be retained for a minimum of three years after the expiration date of the SPDES permit. These records should be maintained at the Depot office. Since the Hammond Depot does not have a SPDES permit, we will maintain all records for a period of not less than three years from the date of record or inspection.



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SECTION 4

BEST MANAGEMENT PRACTICES

Operators of regulated MS4s (municipal separate storm sewer systems) are required by the terms of the SPDES permit to develop and implement a SWPPP in order to achieve the following:

- Reduce the discharge of pollutants to the “maximum extent practicable” (MEP)
- Protect water quality
- Satisfy the appropriate water quality requirements of the Clean Water Act

The Hammond Indiana Depot does not have a SPDES permit but the installation is operating under a Storm Water Pollution Prevention Plan to enhance the operation of the facility and reduce impacts on the natural environment. Implementation of the MEP standard will typically require the development and implementation of BMPs and the achievement of measurable goals to satisfy minimum control measures.

Storm water BMPs help to manage the quantity and improve the quality of storm water runoff.

4.1 EXISTING SOURCE CONTROLS

Keeping contaminants from entering the storm water drainage system is one method of reducing storm water runoff pollution. The Hammond Depot employs the following source control BMPs:

- **Good housekeeping** – A clean and orderly work area reduces the possibility of accidental spills caused by mishandling of chemicals and equipment and can reduce safety hazards to everyone. Well-maintained material and chemical storage areas will reduce the possibility of storm water mixing with pollutants. Some simple procedures applicable to promote good housekeeping are as follows:
 - Prompt cleanup of spills and debris, including cleanup of commodity from punctured or spilled drums and containers
 - Reducing discharge of wash water from vehicles and buildings
 - Scheduled maintenance of machinery
 - Proper material storage practices and inventory controls
 - Routine and regular cleanup schedules
 - Maintaining well-organized work areas
 - Minimizing the exposure of materials to rainfall
- **Spill prevention and proper fluid disposal** – Conscientious attention to detail can reduce the impact of vehicle maintenance activities on storm water discharge, as listed below:
 - Appropriate and timely vehicle maintenance to prevent leaks
 - Prompt repair of fluid leaks Use of biodegradable cleaners

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- Use of biodegradable cleaners
- Appropriate cleanup of spills and leaks
- Use of commercial vehicle washing facilities for over the highway vehicles. Vehicles such as sedans will be washed at commercial vehicle facilities.
- Material handling vehicles such as fork trucks will be washed on site. Soil on the material handling vehicles is material already present on the Hammond Indiana Depot. The area south of the vehicle maintenance building has a sloped floor that contains liquids to the area. Cleaner and a water hose will be used to wash fork trucks and similar vehicles. The minimal amount of contained liquid on the sloped floor may be allowed to dry at the area by evaporation.
- The federal system of items having a National Stock Number (NSN) typically has spray on wipe off cleaners available in a trigger spray container. No rinse necessary cleaners may be used for cleaning along with or instead of water washing of the fork trucks and similar vehicles.



- **Commodity stockpile maintenance and outloading** – Commodity stockpiles present significant potential for impacting storm water quality. Covered or contained materials, such as sealed piles or drums, generally contain commodities that are a greater environmental threat than uncovered, open materials. These enclosures must be kept intact and regularly inspected for tears, cuts, rust holes, or other damage that could result in a leakage of the commodity and pollution of storm water runoff. Any such damage must be promptly rectified.

Whenever commodities are moved, or when containers are found to be broken or damaged, certain measures must be in place to prevent contaminants from entering the storm water runoff. Prior to beginning outloading operations, or when damaged containers are discovered, the following must be completed:

- Workers must identify and locate all storm drains and surface water flow pathways in the vicinity of the work area.
- Appropriate materials, such as hay bales, silt fence, or railroad ties, should be readily available and placed as a barrier between the outloading area and the storm drainage system, to help reduce the amount of any loose commodity material that could get washed into the drainage system by runoff from the outloading area.

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- Surface runoff that flows towards nearby drainage ditches, swales, streams, etc., should also be similarly blocked.
- These activities should be performed not only while storm water runoff is actively occurring, but also to plan ahead for any rainfall, snowfall, snowmelt, etc. that may occur during the outloading/repackaging operations.
- The intent is to minimize the amount of commodity material that could leave the site by way of storm water runoff.
- **Storm drain inlet marking or stenciling** – The drains to the storm water collection system located near Area “G” and Warehouse 100-E are marked, "DUMP NO WASTE!" "DRAINS TO WATERWAYS" with pictograms of fish.
- **Proper herbicide and pesticide use** – Runoff from lawns following maintenance and the improper use, such as over-application and spills, of fertilizers, pesticides, and herbicides contribute to the pollution of storm water runoff. Use of native plants can reduce the need for fertilizers, and keeping grass at a height of at least four inches will decrease the amount of runoff by promoting infiltration. Our Pest Management Plan is available at <https://www.dnsc.dla.mil/iamthekey/login.aspx>
- **Illicit discharge connections** – Detection and elimination of illegitimate connections and discharges into storm water drainage systems is necessary. There are not believed to be any illicit discharge connections at the Hammond Depot.
- **Street and parking lot sweeping** – Runoff from impervious streets and parking lots can contribute significant amounts of pollutants in storm water runoff. Sweeping paved areas that drain into the storm drainage system can remove a portion of this contribution.
- **Catch basin and roadside ditch cleaning** – Catch basins and ditches accumulate sediment and debris, so periodic cleaning is needed to ensure their continued effectiveness.
- **Road salting and sanding** – Runoff from paved areas that have salt, sand, and ash applied as ice prevention can carry large amounts of these materials into the drainage system. Minimizing the application of salt and sand (including alternative deicing products) can help reduce this form of pollution.
- **Snow removal** - Accumulated snow that is removed from roadways and parking lots should be placed in an area where the snowmelt will infiltrate into the ground, such as grass-covered areas, and not in an area draining into the storm water system.

4.2 OTHER POTENTIAL BMP'S

Many additional types of BMPs exist to help reduce storm water runoff pollution.

4.2.1 Materials Management

The handling of oil products should be done in accordance with the Spill Prevention, Control and Countermeasure (SPCC) plan. The methods by which all hazardous materials and chemicals are stored, handled, and used at the facility can contribute to storm water contamination. Recommendations for the proper management of hazardous materials and chemicals include the following:

- Use of alternative less-toxic cleaning supplies, such as baking soda

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- Employing mechanical means of cleaning rather than chemical (removing materials physically rather than with chemicals)
- Recycling of oil and anti-freeze
- Storage of hazardous materials away from heavily-trafficked areas and any floor or storm drains
- Storing hazardous material containers on spill pallets
- Storage of ice-melting salt indoors or within covered areas
- Maintaining adequate spill control equipment and supplies on-site
- Training facility personnel in materials management and spill control and response
- Reducing, reusing, and recycling all materials whenever possible



4.2.2 Structural BMPs

In addition to the non-structural BMPs listed above, structural BMPs can be implemented when new or completely rebuilt systems are installed. Structural BMPs such as the ones listed below are designed to allow runoff to gradually infiltrate into the ground instead of being released into a body of water. A partial list of structural BMPs includes the following:

- Porous pavement
- Infiltration basins
- Underground vaults
- Constructed wetlands
- Vegetated channels

Minimizing directly connected impervious surfaces, such as paved parking lots, streets, and roofs, also limits the amount of runoff into a drainage system. For example, roof downspouts can be disconnected from the drainage system, or curbs and gutters can be eliminated from paved areas, with the runoff allowed to run into vegetated areas before flowing into the drainage system.

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4.2.3 Maintenance of Retention Ponds

Routine maintenance of the retention ponds is required so that they work effectively in collecting storm water runoff. Monthly maintenance activities include trimming vegetation, litter pickup, and monitoring and cleaning the pond outlet structure and culverts. Once a year, preferably in the spring, the pond outlet structure should be inspected, and any necessary repairs should be made.

The ponds may require periodic (every 5 to 10 years) dredging of the coarser sediment that will collect and accumulate near the pond inlet. The entire pond area may require less frequent (every 15 to 25 years) dredging of finer sediments that will distribute and accumulate throughout the permanent pool area. Sediment deposit in the pond should also be checked once a year to help determine the rate of sediment accumulation and the time for dredging operations.

The above maintenance and inspection items are included in the Annual Site Compliance Report (Appendix B).

4.2.4 Construction Activities

Although no construction is foreseen at the Depot, future construction projects may require the implementation of runoff controls. Construction site storm water management and erosion controls must be implemented to minimize soil erosion during construction activities that disturb one or more acres of land. To comply with Phase II regulations, a construction site ordinance must be developed.

Construction site storm water management and erosion controls include the following:

- Use of silt fences or other perimeter controls
- Installing temporary diversion dikes or channels
- Maintaining grass-lined channels for storm water conveyance
- Preserving natural vegetation and seeding, mulching, and/or sodding exposed soils
- Using geotextile fabrics on exposed surfaces
- Controlling dust during construction through the minimal wetting of surfaces

SECTION 5

NON-STORM WATER ASSESSMENT

5.1 NON-STORM WATER DISCHARGES

Non-storm water discharge is water unrelated to precipitation or storm water runoff that is discharged to a storm water drainage system. The following are examples of non-storm water discharges typically authorized by a SPDES permit:

- Fire hydrant flushings
- Potable water sources including waterline flushings
- Irrigation drainage

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- Lawn watering
- Routine external building washdown (not with use of detergents)
- Pavement wash waters (where spills or leaks of toxic or hazardous materials have not occurred, unless all spilled material has been removed, and where detergents are not used.)
- Air conditioning condensate
- Springs
- Uncontaminated groundwater
- Foundation or footing drains (with uncontaminated water)

Appropriate pollution prevention measures are required to reduce any sources of pollutants in non-storm water discharges.



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5.2 AUTHORIZED NON-STORM WATER DISCHARGES AT HAMMOND DEPOT

The following non-storm water discharges are present at the Hammond Depot and are authorized for discharge into the storm water drainage system:

- Air conditioning condensate
- Fire hydrant flushing
- Sprinkler system discharge (when accidentally tripped)

5.3 INSPECTION OF STORM WATER DRAIN INLETS

Not applicable at the Hammond Depot.

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APPENDIX A

SPILLS AND LEAKS FORM

SPILLS AND LEAKS FORM

DLA Hammond Depot

Directions: Record below all significant spills and significant leaks of toxic or hazardous pollutants that have occurred at the site in the last three years.

Definitions: Significant spills include, but are not limited to, the release of oil or hazardous substances in excess of reportable quantities (see Section 2.2).

		DESCRIPTION		RESPONSE PROCEDURES	
Date	Location	Type of Material	Quantity	Amount Recovered	Material is no longer exposed to storm water (yes or no)

Evaluator: _____

Date: _____

APPENDIX B

ANNUAL SITE COMPLIANCE REPORT

DIRECTIONS FOR COMPLETION OF ANNUAL SITE COMPLIANCE REPORT

HAMMOND DEPOT

There are two elements you must consider to fulfill the annual reporting requirement:

1. Routine visual inspection of your storm water system and all areas of the Depot where potential exposure of AOCs exists
2. Completion of the Annual Site Compliance Report.

1. ROUTINE VISUAL INSPECTIONS

The routine visual inspections are not meant to be a comprehensive evaluation of the entire storm water pollution prevention program. Rather, they are meant to be a regular visual assessment of the site to identify conditions that may contribute to contamination of storm water runoff with pollutants from the facility.

The visual inspection is a simple way to confirm that the chosen pollution control measures are in place and working properly. Inspections should periodically take place during storm events, in order to assess the system under adverse conditions. Inspections during extended dry periods, such as when there has been no precipitation, snowmelt or runoff for more than 3 days, are also of value in confirming the absence of non-storm water discharges at the Depot. These visual inspections are meant to complement the annual site compliance report and inspection.

The frequency of inspections is at your discretion, based on the types and amounts of materials handled at the facility, existing BMPs at the facility, degree of pollutant exposure to storm water, and any other factors that may be relevant (i.e., the age of the facility, etc.). However, a good practice is to always look at the general condition of the storm water system as part of a daily routine, such as while driving or walking around the Depot.

Remember, you are the key!

If you notice a potential problem, take the steps to fix it! Keep the lines of communication open. At your monthly safety meetings address any concerns you may have about the current status of your SWPPP. If you see a situation that requires immediate action, act responsibly. Fix the problem or contact personnel who can.

2. COMPLETION OF THE ANNUAL SITE COMPLIANCE REPORT

Information for the report should be collected during the third quarter of each year (April through June). The completed form should be submitted to [Chief Environmental Management Division](#) by June 30 each year.

The following items are keyed to the numbers listed on the Annual Site Compliance Report Form:

1. The evaluator should be the Pollution Prevention Team leader (see Table 3-1)
2. Describe any significant changes in Depot commodity storage or operations that may have occurred during the past year or since the last Annual Site Compliance inspection. Materials stored outdoors that have been moved or eliminated must be noted.

3. List any incident that may have affected the quality of storm water runoff. Include issues from neighboring properties that may influence the storm water drainage system, if known.
4. Complete an inspection form covering each Area of Concern (AOC). The intent is to document that the existing conditions and best management practices are still in place, and to document any changes over the past year. More than one AOC may be included on an inspection form.
5. Mention any other issue or recommendation relating to storm water runoff. Include knowledge of any issues relating to contamination of storm water runoff from adjacent property that may affect the Depot's drainage system.

ANNUAL SITE COMPLIANCE REPORT

DLA HAMMOND DEPOT

Due annually by June 30. Use additional sheets if necessary.

1. Evaluator: _____ **Date:** _____

2. SITE CHANGES: Summary of changes in materials, storm water management, personnel, spills, etc. Note changes in the amount of pollutants discharged into storm water system from activities such as: outdoor storage activities, significant dust or particulate generating processes, loading/unloading operations, on-site waste disposal practices, vehicle and building maintenance, new construction and land disturbances, roadway and other maintenance.

3. INCIDENTS: Address compliance with the SWPPP, including normally allowed non-storm water discharges into the storm water system, such as water line flushing or air conditioning condensation, and any non-compliance issues, such as any spills, illicit connections, or pollutants entering the system.

4. ADEQUACY OF BEST MANAGEMENT PRACTICES Evaluate measures to reduce storm water runoff pollution and determine if measures are adequately and properly implemented. Are additional controls needed? Use the Evaluation Forms included for each Area of Concern.

5. OTHER ISSUES AND RECOMMENDATIONS:

Completed copies of this report, the evaluation form for each area of concern, and the Spills and Leaks Form must be kept with the SWPPP. Copies must also be furnished to [Chief Environmental Management Division](#).

EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT

Areas of Concern D through K

Commodity Stockpiles and Storage Locations, Hammond Depot

The purpose of this form is to annually document the pre-existing conditions at these AOCs and whether or not the conditions have changed. Compare the data for each stockpile listed on Table 3.2, and note any changes or discrepancies on this form. Note any new potential pollutant source (e.g., portable ASTs, dumpsters, changes in stockpile locations, etc.).

Page 1 of 2

<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If “No,” Add Comments & Explanation (use page 2 or extra sheet if needed)
Pollutants of Concern	Ferrochrome and ferromanganese stockpiles and tin	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Storage Type and Location	Seven stockpiles & six storage locations in designated Open Areas, as detailed on Tables 3.2 & 3.3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Existing Storm Water Management Controls	Stored materials are uncovered	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Material Exposed to Storm Water Runoff?	Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Visual Observations of Site Drainage	Runoff infiltrates into the ground or flows into storm water drainage ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Contamination Potential	Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Best Management Practices In Place

Good Housekeeping	Stored in a clean, well-maintained area	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Spill Prevention and Proper Fluid Disposal	No spills to the storm water system have occurred, and waste fluids are not disposed in the storm water system.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Storm Drain Inlet Marking or Stenciling	(Not applicable to Hammond Depot)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Proper Herbicide and Pesticide Use	Applications are in compliance with Pest	<input type="checkbox"/> Yes <input type="checkbox"/> No	

	Management Plan.		
EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT Areas of Concern D through K - Commodity Storage Locations, Hammond Depot <i>Page 2 of 2</i>			
<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If “No,” Add Comments & Explanation (additional space at bottom)
Illicit Discharge Connections	There are no illicit discharge connections to the storm water system.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Street and Parking Lot Sweeping	Area is kept swept and free of debris.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Ditch Cleaning	Ditches are free of debris and proper flow is maintained in ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Road Salting and Sanding	Use of salt around storm water drainage pathways is minimized. Areas of sand application are kept clear of major accumulations.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Snow Removal	Snow from around the commodities should be removed to an area where it can melt and infiltrate into the ground.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Additional Comments: _____

This form completed by: _____

Signature: _____ Date: _____

Completed copies of this report, the Annual Site Compliance Report, and the evaluation form for each area of concern must be kept with the SWPPP. Copies must also be furnished to [Chief Environmental Management Division](#).

EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT			
<u>Areas of Concern A-1 and A-2</u>			
ASTs at Vehicle Maintenance Building (VMB) and at Pump House, Hammond Depot			
The purpose of this form is to annually document the pre-existing conditions at this area of concern and whether or not those conditions have changed.			
			<i>Page 1 of 2</i>
<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If “No,” Add Comments & Explanation (additional space on page 2)
Pollutants of Concern	Fuel products (gasoline and diesel fuel)	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storage Type and Location	Two (2) ASTs at VMB situated on concrete pad, one AST located inside Pump House.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Existing Storm Water Management Controls	ASTs have secondary containment and interstitial monitoring; spill kit is inside nearest building.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Material Exposed to Storm Water Runoff?	Potential exists	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Visual Observations of Site Drainage	Runoff infiltrates ground or flows into storm water drainage ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Contamination Potential	Low to Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
<i>Best Management Practices In Place</i>			
Good Housekeeping	A clean, well-maintained area	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Spill Prevention and Proper Fluid Disposal	No spills to the storm water system have occurred, and waste fluids are not disposed in the storm water system.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storm Drain Inlet Marking or Stenciling	(Not applicable to Hammond Depot)	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT

Area of Concern C

Solid Waste Bins (Dumpsters), Hammond Depot

The purpose of this form is to document annually the pre-existing conditions at this area of concern and whether or not those conditions have changed.

Page 1 of 2

<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If “No,” Add Comments & Explanation (additional space on page 2)
Pollutants of Concern	Solid waste (standard office and kitchen refuse only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Storage Type and Location	Solid waste bins located near vehicle maintenance bldg.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Existing Storm Water Management Controls	No hazardous waste or chemicals of any kind to be placed in bins; lids to be closed at all times.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Material Exposed to Storm Water Runoff?	Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Visual Observations of Site Drainage	Area around dumpsters is kept clean. Runoff infiltrates into the ground, or flows into storm water drainage ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Contamination Potential	Low	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Best Management Practices In Place

Good Housekeeping	Stored in a clean, well-maintained area.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Spill Prevention and Proper Fluid Disposal	No spills to the storm water system have occurred, and waste fluids are not disposed in the storm water system.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Storm Drain Inlet Marking or Stenciling	(Not applicable to Hammond Depot)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Proper Herbicide and Pesticide Use	Applications are in compliance with Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	



EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT

Areas of Concern I

Miscellaneous Materials Stored Outdoors, Hammond Depot

The purpose of this form is to document annually the pre-existing conditions at these AOCs and whether or not the conditions have changed. Compare the data for each material listed on Table 3.3, and note any changes or discrepancies on this form. Note any new potential pollutant source (*e.g.*, portable ASTs, dumpsters, etc.)

Page 1 of 2

<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If “No,” Add Comments & Explanation (use page 2 or extra sheet if needed)
Pollutants of Concern	Slag, limestone, scrap metal, railroad ties, cinder blocks	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Storage Type and Location	Materials stored in open areas. Type and location as on Table 3.4.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Existing Storm Water Management Controls	Materials are uncovered.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Material Exposed to Storm Water Runoff?	Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Visual Observations of Site Drainage	Runoff infiltrates into the ground or flows into storm water drainage ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Contamination Potential	Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Best Management Practices In Place

Good Housekeeping	Stored in a clean, well-maintained area	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Spill Prevention and Proper Fluid Disposal	No spills to the storm water system have occurred, and waste fluids are not disposed in the storm water system.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Storm Drain Inlet Marking or Stenciling	(Not applicable to Hammond Depot)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Proper Herbicide and Pesticide Use	Applications are in compliance with Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	



EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT

Retention Ponds
Hammond Depot

The purpose of this form is to document the annual maintenance and inspection of the storm water retention ponds.

Page 1 of 1

<i>Maintenance and Inspection Item</i>	<i>Item Completed?</i>	If “No,” Add Comments & Explanation (additional space at bottom)
<u>Monthly</u>		
Mow grass around ponds (at least once a month during growing season).	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Pick up trash in and around ponds.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Monitor and clean pond outlet structure and culverts.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
<u>Yearly</u>		
Inspect pond outlet structure, and make any necessary repairs.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Check depth of sediment deposit in each pond.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Determine need for dredging (every 5 to 10 years for coarse sediment near pond inlet, every 15 to 25 years for fine sediment throughout ponds).	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Additional Comments: _____

This form completed by: _____

Signature: _____ Date: _____

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 Copies must also be furnished to [Chief Environmental Management Division](#).
