

*Final*

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# STORM WATER POLLUTION PREVENTION PLAN

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***YOU ARE THE KEY***

**Defense Logistics Agency  
Strategic Materials**

**Scotia Depot  
Scotia, New York**

**MARCH 2011**

*This Storm Water Pollution Prevention Plan was prepared for:*



**Defense Logistics Agency  
Strategic Materials**

**MARCH 2011**

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## ACRONYMNS

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
ESOHMS	ENVIRONMENTAL, SAFETY AND OCCUPATIONAL HEALTH MANAGEMENT SYSTEM
ISCP	INSTALLATION SPILL CONTINGENCY PLAN
MEP	MAXIMUM EXTENT PRACTICABLE
MS4	MUNICIPAL SEPARATE STORM SEWER SYSTEM
NOI	NOTICE OF INTENT
NOITT	NOTICE OF INTENT, TRANSFER OR TERMINATION
NPDES	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
NYSDEC	NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
OSHA	OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
POC	POINT OF CONTACT
PPT	POLLUTION PREVENTION TEAM
RCRA	RESOURCE CONSERVATION AND RECOVERY ACT
SPCC	SPILL PREVENTION, CONTROL AND COUNTERMEASURE
SPDES	STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM
SWPPP	STORM WATER POLLUTION PREVENTION PLAN
USEPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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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's (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 Scotia 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; identified on Table 3.1) will meet and review the items listed on Table 1.
- By the end of the third quarter, the team will complete the Spills and Leaks Form (Appendix A) and the Annual Site Compliance Report (Appendix C); both will be submitted to [Chief 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.

This SWPPP is an update of the previous SWPPP, issued in 2009.

#### 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, heavier 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, if rain falls for a long enough time.
- **Rainfall intensity** – heavy rain will saturate the soil more quickly than a light rain. The result is the soil holds less water, creating surface runoff.

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- **Moisture in Soil** – soil that is already moist will result in runoff being generated sooner than would be the case for dry soil because the 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.
- **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 the opportunity for the water to infiltrate into the soil, while water that falls on steeply sloping land tends to rapidly runoff in a downslope direction.
- **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.



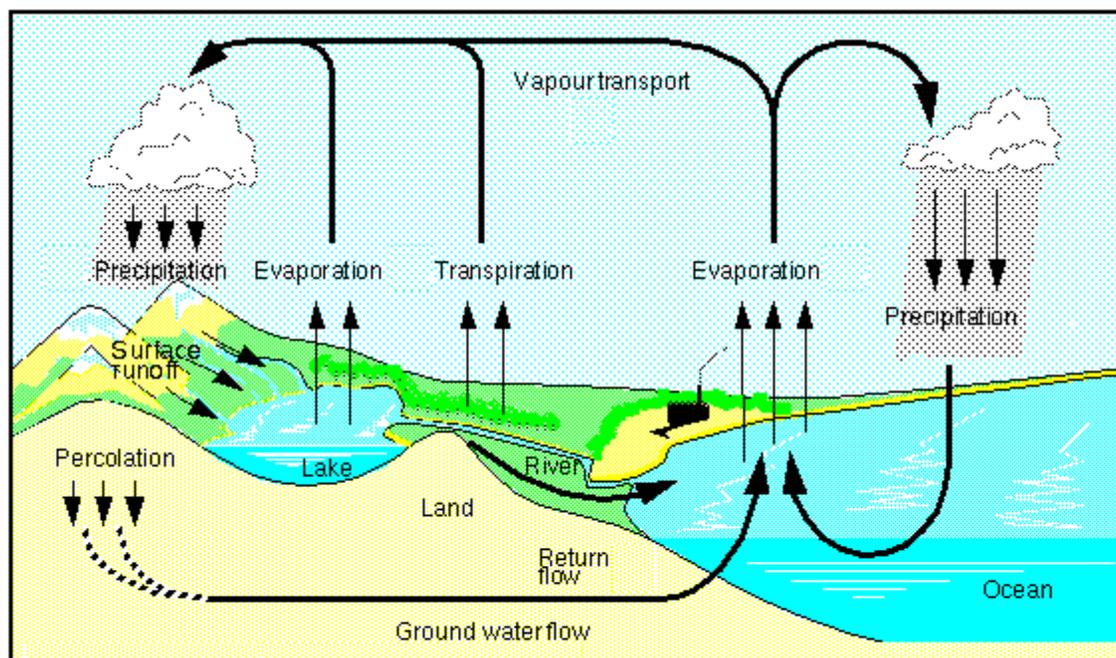
### 1.3 WATER (OR HYDROLOGIC) CYCLE

Water in and on the earth moves in a continuous cycle. This is called the Water (or Hydrologic Water) 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 then flowed into the underground systems, carrying with it whatever mud, debris and filth was 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 emptying 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, 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, parking areas and the like. Some effects of this increased urbanization and the proliferation of impervious surfaces are listed below:

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- Decreased infiltration of storm water into the ground
- Reduced amount of groundwater recharge
- Contamination and slowing of 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

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.

Phase II of EPA’s storm water program was published in 1999, and expands the 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, and the definition of “municipal” includes federal facilities such as storage depots. However, these facilities are covered only if they have a separate storm water system (rather than a combined storm water and sanitary wastewater sewer system) and are present in an “urbanized area”. These urbanized areas have a specific definition, which includes a total population of at least 50,000 and a population density of at least 1,000 people per square mile.

##### 2.1.1 SPDES Permits

Implementation of EPA storm water regulations relies on most individual states issuing general permits covering MS4s. In New York State, regulated MS4 facilities must file a Notice of Intent, Transfer or Termination (NOITT) in order to receive the SPDES general permit. Once covered, regulated facilities will 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.

Although not required for this site, some aspects of the Phase II requirements are being incorporated into this SWPPP, as a practical way to help ensure protection of our environment, and to comply with our policy:

- **Illicit discharge detection and elimination** – often 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 at the Scotia Depot.

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- **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; however, an ordinance has not been developed for the depot. Any construction projects undertaken at the Scotia 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 Scotia 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 Scotia 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 Phase II would require). In the event a construction project sized one acre or more in size is planned, a CSWMP must be prepared, and appropriate BMPs developed and implemented.

When a regulated facility applies for a SPDES permit, the facility must identify its BMPs and measurable goals for each of the six above-mentioned control measures.

### 2.1.2 Scotia Depot's SPDES Permit

The Scotia Depot was previously assigned a SPDES General Permit, number GP-98-03. The SPDES permit issued by the NYSDEC to the Scotia facility (NYR 00D209) expired and the NYSDEC chose to not renew the permit, or require the depot to maintain a permit.

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## 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 are to be documented in this SWPPP.

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 Scotia Depot and the RQs are provided in Table 2.1. These RQ's are applicable only to CERCLA regulations, and smaller quantities of spilled substances may be reportable to other state agencies.

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<b>Table 2.1</b>		
<b>Reportable Quantities (RQ) of Hazardous Substances</b>		
<b>Substance</b>	<b>Component(s)</b>	<b>RQ (gallons)</b>
Gasoline <sup>a</sup>	Benzene	76
Fuel Oil	Hydrogen Sulfide	35,266

<sup>a</sup>Other substances with RQs are present in gasoline, but benzene has the lowest RQ and would trigger reporting requirements.

### **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, you are 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) will indicate the RQ, if applicable. An extensive listing of RQs is also available on the USEPA website. Materials are listed alphabetically by chemical name and also by Chemical Abstracts Service (CAS) Registry Numbers®. The internet address is: <http://www.epa.gov/ceppo/pubs/title3.pdf>. Calculations may be required to determine the RQ of a product if individual components of a product are a hazardous material.

All significant spills and leaks of toxic or hazardous pollutants that have occurred in the past three years must be reported on the Spills and Leaks Form, included in Appendix A. Any release of a hazardous or toxic substance must be handled in accordance with Scotia Depot's Spill Prevention, Control and Countermeasure (SPCC) plan.




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## 2.2 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 is to address physical changes that could be made at our facilities to minimize or eliminate the potential for the contamination of storm water. Also, the purpose of the plan is 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 to:

- 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.



## 2.3 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 include:

- Compliance with all relevant environmental, safety and occupational health laws and regulations, and our policies and procedures.

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- Fostering a dialogue with employees and the public regarding the potential impact of our operations.
- 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 adopt the ESOH Policy Statement and will conduct its business activities and operations in a manner that is consistent with our policy statement.

### **2.3.1 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 shares the storm water drainage system servicing the depot, should be brought to the attention of the depot 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 (i.e., fish), and as a source for drinking water.

## **2.4 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

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safely and effectively to an incident when one occurs, and recognizing situations that could lead to storm water contamination.

### **2.4.1 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.

### **2.4.2 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 New York State 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.

## **2.5 INTERNET ACCESS**

This SWPPP, along with the our ESOH Policy Statement, are available at the “I Am The Key” link on the Home Page located at: <https://www.dnsc.dla.mil/iamthekey/login.aspx>

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## SECTION 3

### SCOTIA DEPOT

#### 3.1 SCOTIA DEPOT

The Defense Logistics Agency's (DLA) Scotia Depot is required to prepare this SWPPP in accordance with our ESOHMS.

##### 3.1.1 Location and Site Description

The depot is located just west of the village of Scotia along New York Route 5 in the town of Glenville, Schenectady County, New York. The depot was constructed in the 1940's and originally occupied a larger tract of property, with a number of parcels transferred to private ownership over the past several years. The land is generally flat, slightly sloping to the south towards the Mohawk River.

This SWPPP applies to the current depot and the storm water drainage system located on the depot. The drainage system also serves nearby properties that were formerly a part of the depot, but are no longer operated by DLA and are not covered under this SWPPP.

This depot site is operated by the DLA, and is owned by the General Services Administration of the United States government. Operations within the Scotia Depot primarily include the storage and handling of heavy metals, ores, and various other commodities, and the off-loading of these materials as they are divested to other parties. Many buildings at the depot are largely vacant inside.

Maps are included in this SWPPP that show the depot, the storm water system and other attributes:

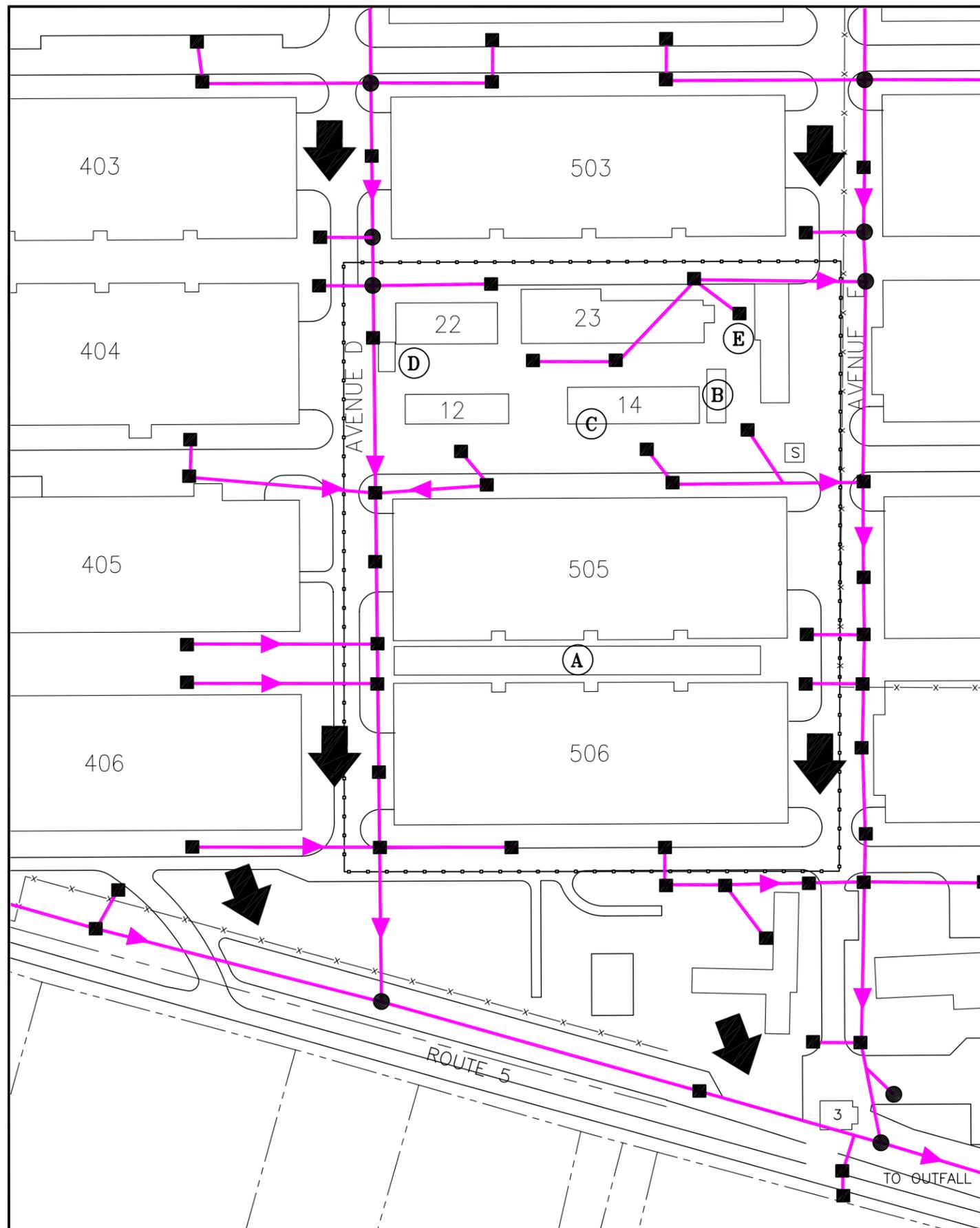
- **Figure 3.1 – Site Location Map.** A topographic map of the surrounding vicinity taken from a quadrangle map, showing nearby features including the Mohawk River and the storm water drainage system outfall location along the river.
- **Figure 3.2 - Storm Water Drainage System Map.** Displays the current boundaries of the Scotia Depot and the storm water drainage system. Featured are inlets and catch basins, the direction of storm water flow and surface flow, and the locations of buildings, a fueling station, a ferrochrome stock pile and solid waste dumpsters.
- **Figure 3.3 - Ferrochrome Stockpile Map.** Shows a close-up of the ferrochrome stockpile area within the depot, providing approximate dimensions in relation to adjacent buildings and storm drains.
- **Figure 3.4 – Zinc Storage Pad Map.** Shows a close-up of the zinc storage area within the depot, providing approximate dimensions in relation to adjacent buildings and storm drains.

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NOTES:

1. "S" INDICATES NEW SECURITY CENTER.
2. LOCATION OF STORM WATER DRAINAGE SYSTEM IS APPROXIMATE.
3. STORM WATER DRAINAGE SYSTEM OUTFALL IS TO MOHAWK RIVER.
4. AREAS OF CONCERN ARE INDICATED AS FOLLOWS:

- (A) FERROCHROME STOCKPILE
- (B) FUELING STATION
- (C) VEHICLE MAINTENANCE AREA
- (D) SOLID WASTE BINS (DUMPSTERS)
- (E) ZINC STORAGE PAD

LEGEND

- STORM SEWER
- MANHOLES
- CATCH BASINS
- FENCELINE
- DNSC PROPERTY LINE
- INDICATES FLOW OF STORMWATER DRAINAGE
- INDICATES SURFACE FLOW DIRECTION



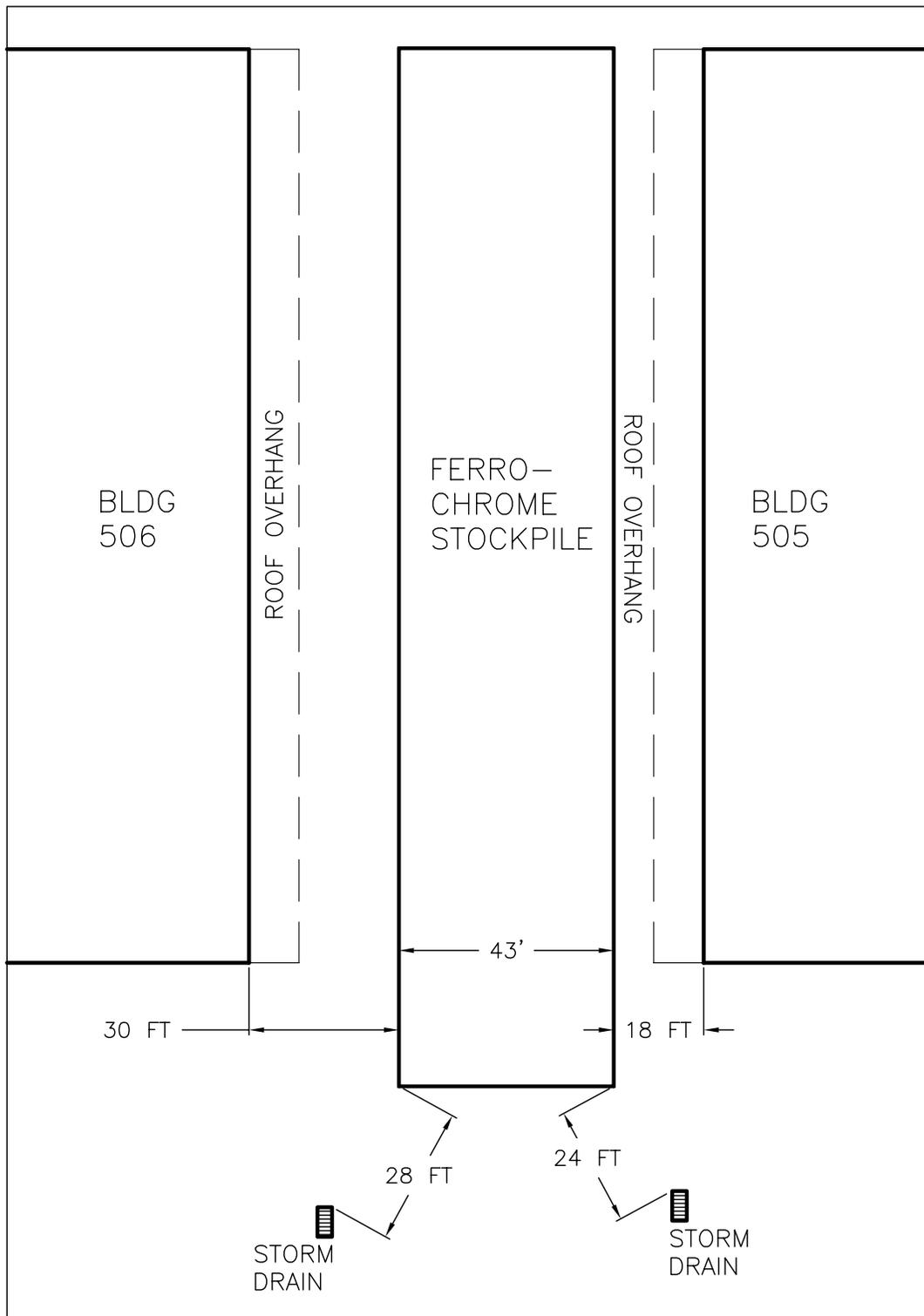
FIGURE 3.2

DLA/DNSC SCOTIA DEPOT  
SCOTIA, NEW YORK

STORMWATER DRAINAGE SYSTEM

**PARSONS**

290 ELWOOD DAVIS ROAD, SUITE 312, LIVERPOOL, N.Y. 13088, PHONE: 315-451-9560



**NOTES:**

1. STOCKPILE IS APPROXIMATELY 10 FT HIGH.
2. DISTANCES ARE MEASURED TO BUILDINGS, NOT TO OVERHANG.
3. STOCKPILE IS ON CONCRETE PAD. AREA SURROUNDING PAD IS FORMER RAILROAD BED NOW COVERED WITH GRAVEL AND SPORADIC VEGETATION GROWTH.

NOT TO SCALE

**FIGURE 3.3**

DLA/DNSC SCOTIA DEPOT  
SCOTIA, NEW YORK

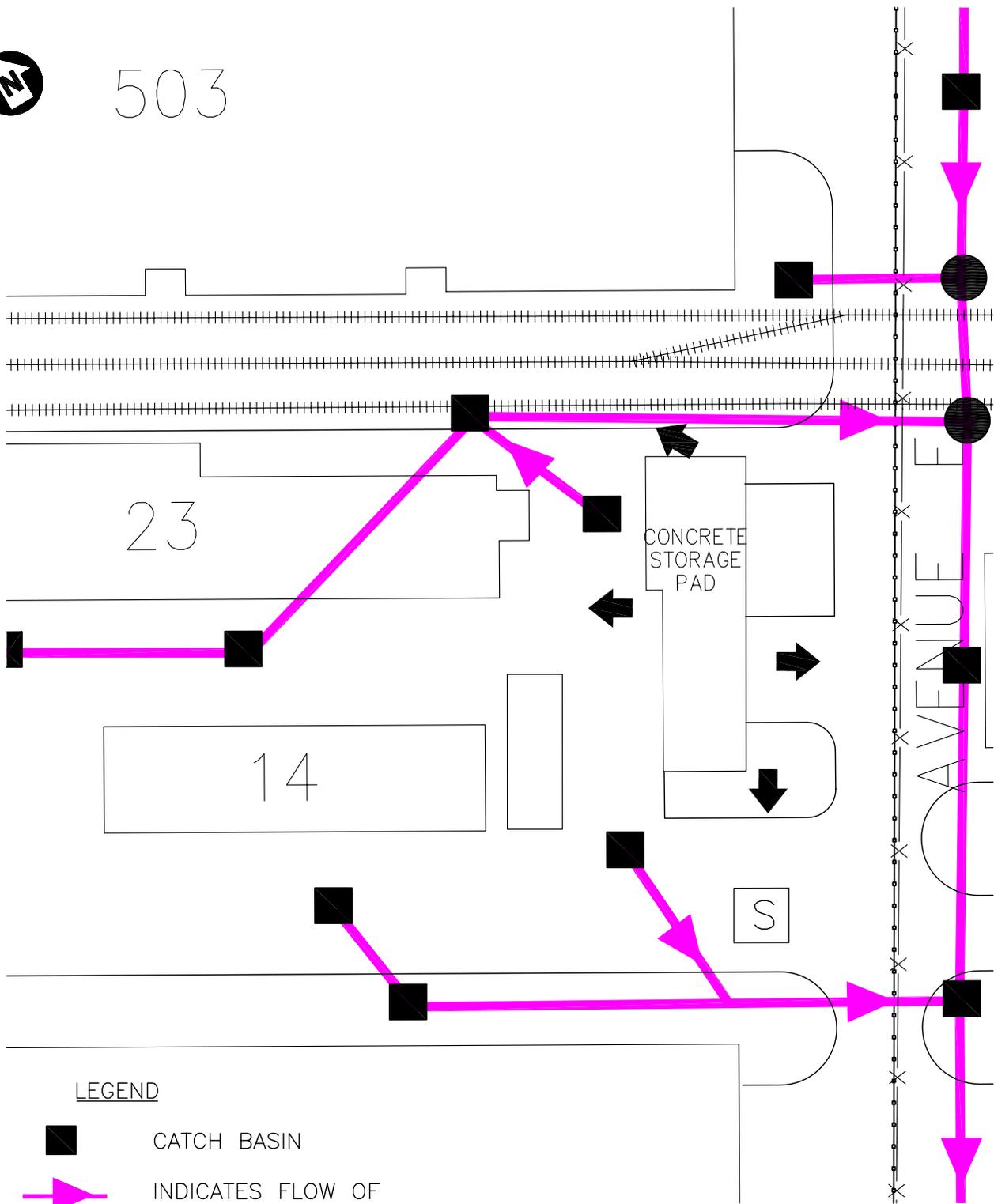
**FERROCHROME STOCKPILE**

**PARSONS**

290 ELWOOD DAVIS ROAD, SUITE 312, LIVERPOOL, N.Y. 13088, PHONE: 315-451-9560



503



LEGEND



CATCH BASIN



INDICATES FLOW OF STORMWATER DRAINAGE



INDICATES SURFACE FLOW DIRECTION



SECURITY BUILDING

14

BUILDING/WAREHOUSE NUMBER



FENCE



APPROXIMATE SCALE

FIGURE 3.4

DLA/DNSC SCOTIA DEPOT  
SCOTIA, NEW YORK

ZINC STORAGE PAD

**PARSONS**

290 ELWOOD DAVIS ROAD, SUITE 312, LIVERPOOL, N.Y. 13088, PHONE: 315-451-9560

### **3.1.2 Outfall of the Storm Water System**

The storm water drainage system on-site was constructed to serve the entire original depot, and today still serves the majority of this original area, even though individual parcels are now privately owned. The system conveys storm water runoff from the Scotia Depot and other nearby plots. The outfall for the storm water drainage system is to the Mohawk River, approximately one-half mile south of the depot. The outfall is located a few hundred feet downstream of Lock 8 on the Mohawk River, near Maalwyck Park.

The Mohawk River receives discharge from many storm water outfalls similar to the one servicing the Scotia Depot. Although the impact of one outfall may seem relatively minor, the river is used for fishing, boating, swimming, and as a drinking water source. Any contamination entering the river can negatively affect the quality of the river and the wildlife that depend on the river, as well as human health.

## **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 facility 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 on-site 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 facility to facility.

### **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 Scotia Depot PPT is identified in Table 3.1.

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

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### 3.3 FORMS

Appendices A and C contain two forms that will be completed by the PPT:

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

Directions for completing the Annual Site Compliance Report and conducting Routine Visual Inspections are located in Appendix C.

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**Table 3.1**  
**POLLUTION PREVENTION TEAM**

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

<b>Member</b>	<b>Responsibilities</b>
<p><b>John Eller,</b> Team Leader, Distribution Facilities Manager (W): (518) 370-3347 (C): (304) 675-0545</p>	<ul style="list-style-type: none"> <li>· Coordinates all stages of SWPPP development and implementation.</li> <li>· Coordinates employee training programs.</li> <li>· Completes annual site compliance reports.</li> <li>· Conducts or contracts annual inspection and certification of non-storm water discharges, as required.</li> <li>· Administers and oversees all team members' activities.</li> <li>· Coordinates SWPPP updates as needed.</li> <li>· Maintains all records and submits reports, as necessary.</li> <li>· Maintains updated spill records and updates the SWPPP to reflect any spills that occur on-site.</li> </ul>
<p><b>Mike Mastronardi</b> Member, General Supply Specialist (W): (518) 370-3347 (C): (607)-343-3458</p>	<ul style="list-style-type: none"> <li>· Ensures good housekeeping practices.</li> <li>· Conducts on-site preventive maintenance inspections.</li> <li>· Updates material inventories.</li> <li>· Assists the Team Leader during annual site compliance reports.</li> </ul>
<p><b>Dewey Blair,</b> Member, General Supply Specialist, (W): (518) 370-3347 (C): (518)-858-4106</p>	<ul style="list-style-type: none"> <li>· Attends meetings and assists other team members as needed.</li> <li>· Provides input concerning commodity storage and removal that may affect the SWPPP.</li> </ul>

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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 to impact storm water quality.

Areas of Concern at the Scotia Depot (indicated on Figure 3.2) include the following:

- A. **Outside ferrochrome stockpile** – three piles 10 feet high are stored on a concrete pad and/or concrete blocks between Buildings 505 and 506, exposed to precipitation. Storm water runoff infiltrates into the adjacent part-vegetative, part-gravel surfaces, or drains into two inlets, each within 30 feet of the stockpile (Figure 3.3).
- B. **Vehicle fueling station** with aboveground storage tanks (ASTs) – located east of Building 14 next to the re-fueling pumps. Two tanks are beneath a canopy, one is uncovered. The ASTs are on a paved lot with storm water runoff entering nearby inlets. The ASTs include:
  - one 560-gallon diesel fuel tank (covered)
  - one 250-gallon kerosene tank (covered)
  - one 1,000-gallon gasoline tank (uncovered)
- C. **Vehicle maintenance and cleaning areas** – Vehicle maintenance is generally performed by contractors inside Building 14, but is done outside the building on a paved surface when weather permits. Vehicles include off-road machinery used at the depot (i.e., bulldozers, all-terrain vehicles), but generally not street-legal cars and trucks, which are usually maintained off-site. Storm water runoff from the maintenance area flows into nearby storm drain inlets.
- D. **Solid waste bins** (dumpsters) – two solid waste dumpsters are located near the west end of Building 22. The bins have hinged covers that are kept closed, except when in use. Only common office and kitchen-type refuse is allowed in the dumpsters. The dumpsters are on a concrete pad, and storm water runoff drains to nearby inlets.
- E. **Zinc Storage Pad** – Zinc ingots are stored on a concrete pad, east of Buildings 14 and 23 (Figure 3.4). Storm water runoff drains to the storm water sewer system. The zinc ingots are blocks of metal and are stored in the open.

#### 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 C. Briefly, the following BMPs are in effect at each Scotia Depot AOC:

- **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.

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- **Illicit Discharge Connections** - There are no illicit discharge connections to the storm sewer 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

Records of all preventative maintenance inspections, records of employee training sessions and the annual site compliance report should be retained for a minimum of three years. These records should be maintained at the depot office.



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## SECTION 4

### BEST MANAGEMENT PRACTICES

Operators of regulated MS4s (including the Scotia Depot) are required to develop and implement a SWPPP in order to:

- 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.

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. The following USEPA-recommended BMPs are applicable at most of our facilities with storm water drainage systems.

#### 4.1 EXISTING SOURCE CONTROLS

Keeping contaminants from entering the storm water drainage system is one method of reducing storm water runoff pollution. Scotia 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 include:
  - Prompt cleanup of spills and debris
  - Reducing discharge of wash water (i.e., from vehicles and buildings)
  - Scheduled maintenance of machinery
  - Proper material storage practices and inventory controls
  - Routine and regular clean up 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:

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- Appropriate and timely vehicle maintenance to prevent leaks
- Prompt repair of fluid leaks
- Proper disposal or recycling of used fluids
- Use of biodegradable cleaners
- Appropriate cleanup of spills and leaks
- Using commercial vehicle washing facilities rather than on-site washing.



- **Proper Herbicide and Pesticide Use** – runoff from lawns following maintenance and the improper use (i.e., over-application, 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.
- **Illicit discharge connections** – detection and elimination of illegitimate connections and discharges into storm water drainage systems is necessary.
- **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.

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- **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

Handling oil products should be done in accordance with the our Spill Prevention, Control and Countermeasure (SPCC) plan. The methods by which all materials are stocked, handled and used at the facility can contribute to storm water contamination. Materials management recommendations are as follows:

- Use alternative less-toxic cleaning supplies, such as baking soda
- 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
- Storing hazardous material containers on spill pallets
- Storage of road 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
- Reduce, reuse and recycle 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 are designed to allow

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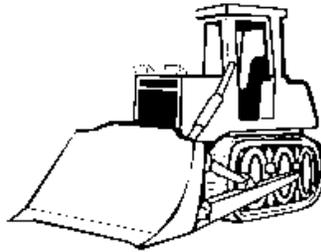
runoff to gradually infiltrate into the ground instead of being released into a body of water. A partial list of structural BMPs includes the following:

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

Minimizing directly connected impervious surfaces (i.e. paved parking lots, streets, 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.

#### 4.2.3 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:

- Use 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

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## 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 enters a storm water drainage system. The following are examples of non-storm water discharges:

- Fire Hydrant Flushings
- Potable Water Sources Including Waterline Flushings
- Irrigation Drainage
- 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 Ground Water
- 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 SCOTIA DEPOT**

The following non-storm water discharges are present at the Scotia 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**

The storm water drain inlets on the Scotia Depot property were inspected in October 2003 for illicit connections. No evidence of illicit connections was noted, nor was any dry weather flow into the storm drainage system. Several storm water drains had smaller inlets located beneath the surface-level, emptying into the system. Upon inspection, however, these inlets were not noticeably connected to any other pipe system or source, and the inlets showed no signs of use (i.e. dry surfaces, no stains observed).

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## **APPENDIX A**

### **SPILLS AND LEAKS FORM**

**SPILLS AND LEAKS FORM**

**DLA Scotia Depot**

**Directions:** Record below all significant spills and significant leaks of toxic or hazardous pollutants that have occurred at the site since the last report was filed.

**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:** \_\_\_\_\_

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## **APPENDIX B**

# **ANNUAL SITE COMPLIANCE REPORT**

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## **DIRECTIONS FOR COMPLETION OF ANNUAL SITE COMPLIANCE REPORT**

There are two elements to the annual reporting requirement:

1. Routine visual inspection of the 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. Inspections should periodically take place during storm events, in order to assess the system under adverse conditions. 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 report form:

1. The evaluator should be the Pollution Prevention Team leader (see Table 3-1)

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2. Describe any significant changes in depot commodity storage or operations that may have occurred during the past year.
3. List any incident that may have affected the quality of storm water runoff. Include issues from neighboring properties using the storm water drainage system, if known.
4. Complete a form for each Area of Concern. The intent is to document that the existing conditions and best management practices are still in place, or to document any changes over the past year.
5. Mention any other issues or recommendations relating to storm water runoff. Include knowledge of any issues relating to contamination of storm water runoff from adjacent property that may share the drainage system.

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**ANNUAL SITE COMPLIANCE REPORT**

**SCOTIA 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.

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**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.

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**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 a separate Evaluation Form for each Area of Concern.

**5. OTHER ISSUES AND RECOMMENDATIONS:**

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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

### Area of Concern A

#### Ferrochrome Stockpile

#### Scotia Depot

The purpose of this form is to document annually the pre-existing conditions at this area of concern and to document 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>	<b>If “No”, Add Comments, Explanations</b> (additional space on page 2)
Pollutants of Concern	Chromium (total), Aluminum, Iron	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storage Type and Location	Ore piles stored on concrete pad located between buildings 505 and 506..	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Existing Storm Water Management Controls	Piles are stored uncovered on a concrete pad. Piles are contained with railroad ties.	<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 flows into storm water catchbasins with discharge to the Mohawk River.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Contamination Potential	Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
<b><i>Best Management Practices In Place</i></b>			
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	_____
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

### Area of Concern B

#### Fueling Station

#### Scotia Depot

The purpose of this form is to document annually the pre-existing conditions at this area of concern and to document 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>	<b>If “No”, Add Comments, Explanations</b> (additional space on page 2)
Pollutants of Concern	Fuel products (gasoline, diesel fuel, kerosene)	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storage Type and Location	Three (3) aboveground storage tanks (ASTs) east of Building 14.	<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. Diesel and kerosene ASTs have overhead cover.	<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 flows into storm water catchbasins with discharge to the Mohawk River.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Contamination Potential	Low to Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
<b><i>Best Management Practices In Place</i></b>			
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	_____

<b>EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT</b>			
<b>Area of Concern B - Fueling Station - Scotia Depot. Page 2 of 2</b>			
<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	<b>If "No", Add Comments, Explanations</b> (additional space at bottom)
Proper Herbicide and Pesticide Use	Applications are in compliance with Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
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	_____
Catchbasin and Ditch Cleaning	Catch basins and 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 vicinity 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

### Area of Concern C

#### Vehicle Maintenance

#### Scotia Depot

The purpose of this form is to document annually the pre-existing conditions at this area of concern and to document 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>	<b>If “No”, Add Comments, Explanations</b> (additional space on page 2)
Pollutants of Concern	Vehicle maintenance activities and products (oil, anti-freeze, cleaners, etc.)	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storage Type and Location	Stored inside buildings, in manufacturer’s original containers. Most maintenance done inside building, occasionally outside.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Existing Storm Water Management Controls	Use of drip pans to catch spilled or leaked fluids; perform activities away from storm drains.	<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	Garage and driveway areas are kept clean. Runoff flows into storm water catchment basins with discharge to the Mohawk River.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Contamination Potential	Low	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
<b><i>Best Management Practices In Place</i></b>			
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	_____

<b>EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT</b>			
<b>Area of Concern C - Vehicle Maintenance - Scotia Depot. Page 2 of 2</b>			
<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	<b>If “No”, Add Comments, Explanations</b> (additional space at bottom)
Proper Herbicide and Pesticide Use	Applications are in compliance with Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Illicit Discharge Connections	There are no illicit discharge connections to the storm water system.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Street and Parking Lot Sweeping	Area is kept swept and free of debris.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Catchbasin and Ditch Cleaning	Catchbasins and ditches are free of debris and proper flow is maintained in ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
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	<hr/> <hr/> <hr/> <hr/>
Snow Removal	Snow from around the vicinity should be removed to an area where it can melt and infiltrate into the ground.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>

Additional Comments: \_\_\_\_\_  
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This form completed by: \_\_\_\_\_

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

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## EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT

### Area of Concern D

#### Solid Waste Bins (Dumpsters)

#### Scotia Depot

The purpose of this form is to document annually the pre-existing conditions at this area of concern and to document 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>	<b>If “No”, Add Comments, Explanations</b> (additional space on page 2)
Pollutants of Concern	Solid waste (standard office and kitchen refuse)	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storage Type and Location	Solid waste bins (dumpsters) located west of Building #22	<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 flows into storm water catchment basins with discharge to the Mohawk River.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Contamination Potential	Low to Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
<b><i>Best Management Practices In Place</i></b>			
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	_____
Proper Herbicide and Pesticide Use	Applications are in compliance with Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

<b>EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT</b>			
<b>Area of Concern D - Solid Waste Bins- Scotia Depot. Page 2 of 2</b>			
<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	<b>If "No", Add Comments, Explanations</b> (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	_____
Catchbasin and Ditch Cleaning	Catchbasins and 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 vicinity 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: \_\_\_\_\_

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This form completed by: \_\_\_\_\_

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

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## EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT

### Area of Concern E

#### Zinc Storage Pad

#### Scotia Depot

The purpose of this form is to document annually the pre-existing conditions at this area of concern and to document 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>	<b>If "No", Add Comments, Explanations</b> (additional space on page 2)
Pollutants of Concern	Zinc	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Storage Type and Location	Stacked metals stored on concrete pad	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Existing Storm Water Management Controls	Stacked zinc ingots are stored uncovered	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Material Exposed to Storm Water Runoff?	Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Visual Observations of Site Drainage	Runoff flows into storm water catch basins that flow into the Mohawk River.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
Contamination Potential	Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
<b><i>Best Management Practices In Place</i></b>			
Good Housekeeping	Stored in a clean, well-maintained area.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/>
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	<hr/> <hr/> <hr/> <hr/>

<b>EVALUATION FORM FOR THE ANNUAL SITE COMPLIANCE REPORT</b>			
<b>Area of Concern E- Zinc Storage Area - Scotia Depot. Page 2 of 2</b>			
<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	<b>If "No", Add Comments, Explanations</b> (additional space at bottom)
Proper Herbicide and Pesticide Use	Applications are in compliance with Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/>
Illicit Discharge Connections	There are no illicit discharge connections to the storm water system.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/>
Street and Parking Lot Sweeping	Area is kept swept and free of debris.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/>
Catchbasin and Ditch Cleaning	Catchbasins and ditches are free of debris and proper flow is maintained in ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/>
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	<hr/> <hr/>
Snow Removal	Snow from around the vicinity should be removed to an area where it can melt and infiltrate into the ground.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/>

Additional Comments: \_\_\_\_\_  
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This form completed by: \_\_\_\_\_

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

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