
**POINT PLEASANT DEPOT
STORM WATER POLLUTION
PREVENTION PLAN
AND GROUNDWATER PROTECTION PLAN**



**Defense Logistics Agency
Strategic Materials
Point Pleasant Depot
Point Pleasant, West Virginia**

*This Storm Water Pollution Prevention Plan and
Groundwater Protection Plan were prepared for:*

**Defense Logistics Agency
Strategic Materials**



(Updated November 2010)

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ACRONYMS

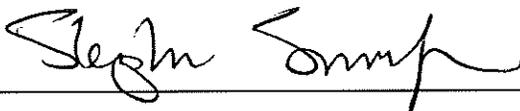
AOC	Area of Concern
AST	Aboveground Storage Tank
BMP	Best Management Practice
BOSS	Base Operating Support Service
CAS	Chemical Abstracts Service
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CSWMP	Construction Storm Water Management Plan
CWA	Clean Water Act
DFM	Distribution Facilities Manager
DLA	Defense Logistics Agency
DNSC	Defense National Stockpile Center
ESOH	Environmental, Safety and Occupational Health
ESOHMS	Environmental, Safety and Occupational Health Management System
GPP	Groundwater Protection Plan
GSA	General Services Administration
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MSDS	Material Safety Data Sheet
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
POC	Point of Contact
PPC	Pollution Prevention Committee
RQ	Reportable Quantity
SPCC	Spill Prevention, Control and Countermeasures
SPDES	State Pollutant Discharge Elimination System
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VFA	Vehicle Fueling Area
WVDEP	West Virginia Department of Environmental Protection

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**STORM WATER POLLUTION PREVENTION PLAN AND
GROUNDWATER PROTECTION PLAN CERTIFICATION**

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

 Feb. 9, 2011

Stephen Surface

Date

Director, Directorate of Materials Management

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SECTION 1

INTRODUCTION

1.1 PURPOSE OF THIS STORM WATER / GROUNDWATER PROTECTION PLAN

The purpose of this plan is to provide guidance on how to prevent storm water and groundwater pollution at the Point Pleasant Depot. The key elements are as follows:

- Each year during the third quarter (April through June) the Pollution Prevention Committee Team Leader (identified on Table 3.1) will review the items listed on Table 3.1. The Spills and Leaks Form will be completed (Appendix A).
- By the end of each quarter the Quarterly Site Compliance Report (Appendix B) will be completed.
- The Quarterly Site Compliance Report will be submitted to Chief Environmental Management Division within two weeks of completion, and the Spills and Leaks Form (Appendix A) will be submitted by June 30 of each year.

1.1.1 SWPPP/GPP Revisions

This SWPPP/GPP 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/GPP must be updated in a timely manner..

1.2 WHAT ARE GROUNDWATER AND STORM WATER?

Groundwater: Water infiltrating through the ground surface first passes through what is called the zone of aeration or unsaturated zone. In this zone, a mixture of air and water fills the spaces between the rock and soil particles. From here, water is taken up by plant roots, discharged into a body of water, or flows down to the next zone, which is the zone of saturation or saturated zone. Here all the spaces between particles are completely filled with water. The top of this zone is commonly referred to as the “water table.” Contrary to popular belief, groundwater is not an underground river or lake. Rather, it is all the water below the water table stored in subsurface void spaces within underground rocks and unconsolidated material. Groundwater eventually returns to surface reservoirs (such as streams, lakes or oceans); however, at times, groundwater can be recharged by these reservoirs. The permeable layer that transports groundwater beneath the surface is called an aquifer. Aquifers can be unconfined or may be located beneath a confining layer, such as a layer of clay. Unconfined and confined aquifers are sometimes connected and groundwater will flow between layers.

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

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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 the soil holds less 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 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.

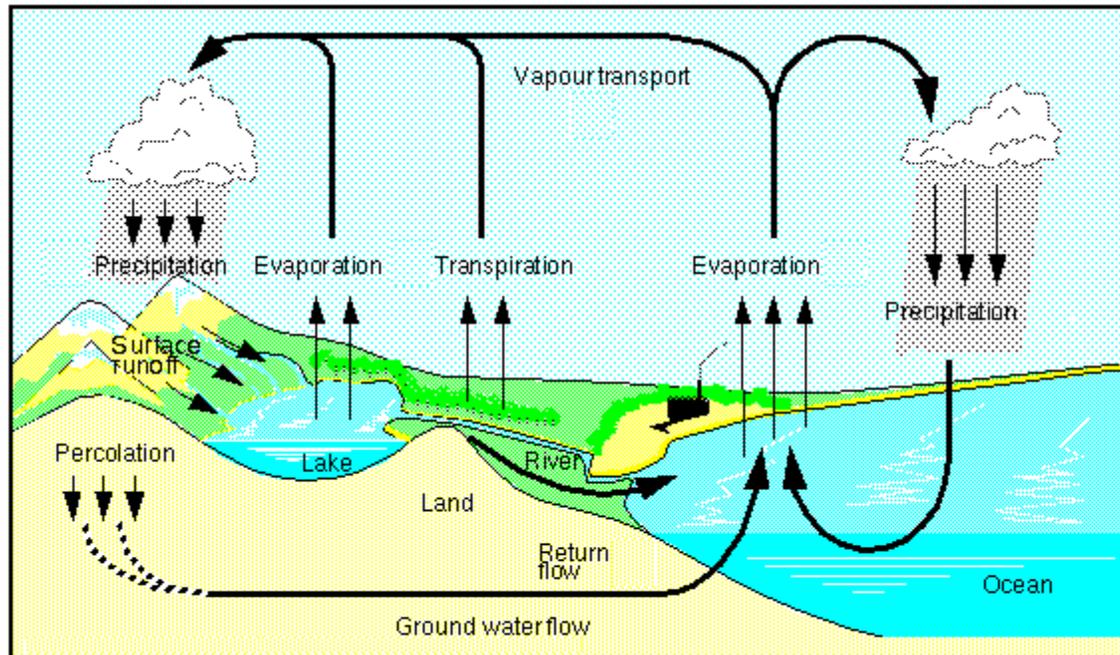


1.3 WATER (OR HYDROLOGIC) CYCLE

Water in and on the earth moves in a continuous cycle. This is called the Water (or Hydrologic) 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 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:

- Decreased infiltration of storm water into the ground

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- 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

Storm water regulations are discussed in the following subsections.

2.1.1 Phase I

Federal storm water regulations were first promulgated and issued in 1990. Under Phase I of the storm water program, the United States Environmental Protection Agency (USEPA) National Pollutant Discharge Elimination System (NPDES) and State Pollutant Discharge Elimination System (SPDES) permit coverage focused on addressing 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.

2.1.2 Phase II

Phase II of USEPA’s storm water program was promulgated in 1999, and expands 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, (1) a separate storm water system (rather than a combined storm water and sanitary wastewater sewer system) and (2) 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 relies on most individual states issuing general permits covering MS4s. The Point Pleasant Depot has been issued a Multi-Sector General WV/NPDES Water Pollution Control Permit for Storm Water Discharges Associated with Industrial Activity by the West Virginia Department of Environmental Protection (WVDEP). This SWPPP/GPP has been prepared to conform to Phase II and WVDEP requirements.

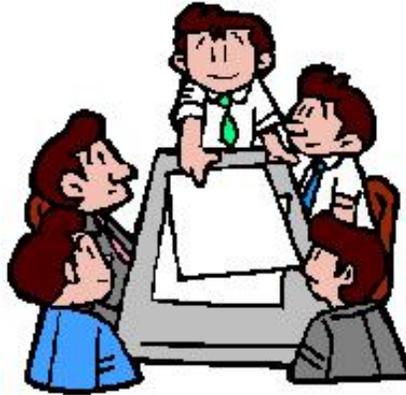
Facilities subject to Phase II requirements must address the following six minimum control measures, and specific procedures being implemented at Point Pleasant are noted herein:

- **Public education and outreach** – to increase awareness of sources of storm water pollution and measures used to control these sources. As part of its environmental program, we will provide local government officials and other interested parties with copies of this plan.

Public participation/involvement – an informed and knowledgeable community is critical to the success of a SWPPP/GPP. The community may be included in the SWPPP/GPP development process.

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- **Illicit discharge detection and elimination** – sometimes connections of sanitary sewer lines are illegally made to storm water systems, 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 Point Pleasant Depot.
- **Construction site runoff control** – land stripped of vegetative cover will increase the amount of storm water runoff, as well as the sediment load contained in that runoff. Phase II requires the development of a construction site plan; however, a plan has not been developed for the depot. Major construction projects undertaken at the Point Pleasant 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, major construction projects at the Point Pleasant 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 Point Pleasant 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/GPP (as Phase II would require). 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.

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

2.1.3 Point Pleasant Depot's WV/NPDES Permit

A Multi-Sector General Water Pollution Control Permit has been issued by the WVDEP to the Point Pleasant Depot (Appendix C):

- General Permit is Number WV0111457;

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- Permit Registration Number is WVG610088;
- The current permit expires on March 31, 2014.

Facilities covered under the Multi-Sector General Permit are required to develop a SWPPP and a GPP. This document combines both the SWPPP and GPP for the Point Pleasant Depot.

2.1.3.1 Industrial Activity Description

The industrial activities conducted at the Point Pleasant Depot fall under Sector W-1 of the WV/NPDES permit: “Storm Water Discharges Associated With Industrial Activities From Facilities That Are Not Covered Under Sectors A Through V.” Sector W-1 includes outfall monitoring as outlined in the following section of this plan and summarized in Table 2.1.

Stockpiling of metal ore is the only industrial activity that may reasonably be expected to add significant amounts of pollutants to storm water or groundwater discharges at the depot. A list of commodities stored at the Point Pleasant Depot that are exposed to storm water is provided in Table 3.2.

2.1.3.2 Monitoring Requirements and Sampling Data

Under the WV/NPDES Multi-Sector General Water Pollution Control Permit, the Point Pleasant Depot is subject to partial Sector W storm water monitoring and reporting requirements. Table 2.1 summarizes the sampling requirements for the two storm water outfalls currently monitored at the depot: Outfalls 002 and 003. Additional information on the depot outfalls is detailed in Section 3.1.3 of this plan.

In accordance with the WV/NPDES permit, where a facility has two or more outfalls that discharge substantially identical effluents, the permittee may test the effluent of one such outfall and report that the data also applies to the substantially identical outfalls. Although the industrial activity (metals stockpiling) is the same for each of the two monitored storm water outfalls at the Point Pleasant Depot, the drainage areas for each monitored outfall contain different ore. Therefore, the effluent at each monitored storm water outfall is not substantially identical and must be individually monitored (Table 2.1).

The seven additional outfalls (Outfalls 001, 004, 005, 006, 007, 008 and 009) present at the depot do have substantially identical effluent to the monitored Outfall 002. Characteristics of these additional outfalls are presented in Section 3.1.4 of this plan.

Table 2.1 Summary of Storm Water Monitoring Requirements Point Pleasant Depot				
Site	Analytical Monitoring Requirements	Cut-off Concentration	Sampling Frequency	Additional Monitoring
Outfall 002 Outfall 003	Oil & Grease (#2 only)	15 mg/L	Bi-annual (every 6 months)	Bi-annual visual observations of storm water each
	pH (#2 & #3)	6.0-9.0 s.u.		

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mg/L – milligrams per liter
s.u. – standard units

If the average concentration for any indicator pollutant in the previous year's sampling was greater than the corresponding cut-off value for that pollutant, then the depot is required to review its storm water pollution prevention practices and revise this SWPPP/GPP accordingly.

2.1.3.3 Low Concentration Waiver

Due to a review of our facility's discharge monitoring data, the state has waived all monitoring at Outfall 001, it requires monitoring only for pH and oil & grease at 002, and only for pH at 003. In this instance, a certification must be submitted to the WVDEP Office of Water Resources each year in lieu of monitoring data, stating that no significant change in industrial activity or pollution prevention measures have occurred within the drainage area for that outfall. The waiver is only valid for the term of the current permit registration.

2.1.3.4 Visual Examination of Storm Water Runoff

In addition to the sampling and monitoring requirements described above, visual examinations of storm water discharges from each outfall must be made during each bi-annual monitoring period. The examinations must be of a grab sample collected within 30 minutes (or as soon thereafter as practical, but not to exceed one hour) of when the runoff or snowmelt begins discharging from each outfall.

The examination of the storm water grab samples shall include any observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil, sheen, or other obvious indicators of storm water pollution. The visual examination should be documented on examination reports to include the following:

- Examination date and time
- Name of inspector
- Visual quality of the storm water discharge
- Probable sources of any observed storm water contamination.

The Storm Water Visual Examination Form included in Appendix B is to be utilized to document visual bi-annual examinations, and copies of the completed reports must be maintained onsite within this SWPPP/GPP.

2.1.3.5 Groundwater Site Inspections

Groundwater site inspections will be performed quarterly (once every three months) at the Point Pleasant Depot, as required by the WV/NPDES permit. The inspections will verify that all elements of the SWPPP/GPP are in place, functioning properly and are appropriately managed. Quarterly Site Compliance Reports for this purpose are included in Appendix B.

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2.1.3.6 Quarterly Site Compliance Report and Spills and Leaks Form

To comply with provisions of a WV/NPDES Permit, the depot is required to perform a quarterly review by completing the Quarterly Site Compliance Report (as detailed above) located in Appendix B. The Spills and Leaks Form should be completed whenever there is a spill, but at least once per year, and this form is located in Appendix A. Directions for completing the Quarterly Site Compliance Report are provided in Appendix B.

This SWPPP/GPP should be updated whenever conditions change at the depot (i.e. materials becoming exposed to or removed from exposure to storm water runoff) as noted during inspections or otherwise. Revisions to the plan should be made in a timely manner, but in no case greater than four weeks from the time when conditions are noted to have changed.

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. No spills or leaks have been reported at the Point Pleasant Depot in the three years prior to the date of this SWPPP/GPP.

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.

As of the date of this plan, there are no hazardous substances present, nor planned to be present, at the Point Pleasant depot..

2.2.1 Action Following a Significant Spill

If a hazardous substance is released to the environment in excess of the RQ, the depot is required to notify the National Response Center (NRC) 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, 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. Materials are listed alphabetically by chemical name and also by Chemical Abstracts Service (CAS) Registry Numbers®. The internet address is:

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<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 considered a hazardous material.

Significant spills and leaks of toxic or hazardous pollutants 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 (DFM). 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..

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 DFM. 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/GPP

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 to minimize or eliminate the potential for the contamination of storm water runoff. 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/GPP are to:

- Identify and characterize potential sources of storm water and groundwater pollution;
- Select and design BMPs to be implemented for control of pollution sources; and,
- Develop a program of continuing inspection, maintenance and monitoring to facilitate reduction or elimination of storm water and groundwater 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 activities, commodities, and services and establishes environmental goals and objectives. Compliance with this SWPPP/GPP 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.
- Fostering a dialogue with employees and the public regarding the potential impact of our operations.
- Promoting environmental stewardship through the prevention of pollution.

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

2.4.1 The SWPPP/GPP Needs Your Help

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

When on-site employees should keep an eye open to identify conditions that may contribute to contamination of storm water runoff and of groundwater. Should you notice a potential problem, take the steps to fix it! Keep the lines of communication open. Report any concerns you may have about the current status of the SWPPP/GPP. If you see a situation that requires immediate action, act responsibly. Fix the problem or contact personnel who can.

Knowledge of any storm water or groundwater contamination, including that from non-government property that may share a storm water drainage system servicing the depot, should be brought to the attention of the DFM or a PPC 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), or as a source for drinking water.

2.5 TRAINING

Employee training is essential to effective implementation of the SWPPP/GPP. 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 and groundwater pollution prevention training will be provided for employees at the parent Warren, OH depot during at least one monthly safety meeting. .

The depot manager will document completion of the training in a file maintained at the Warren depot..

2.5.2 Additional Training Required

- Members of the Storm Water Pollution Prevention Committee (PPC) will meet annually to discuss the SWPPP/GPP. The Team Leader will coordinate the meetings and will update on new developments regarding Federal and West Virginia storm water regulations.
- A copy of the SWPPP/GPP will be posted at the site
- Employees will receive annual training in storm water pollution prevention and good housekeeping practices.

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2.6 INTERNET ACCESS

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

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SECTION 3

POINT PLEASANT DEPOT

3.1 POINT PLEASANT DEPOT

The Defense Logistic Agency (DLA) Strategic Materials is required to prepare this SWPPP/GPP for the Point Pleasant Depot in accordance with WV/NPDES permit requirements.

3.1.1 Location and Site Description

The depot is located at 2601 Madison Avenue in the City of Point Pleasant, Mason County, West Virginia, and was constructed in 1940 as a Naval Shipyard. The facility was converted to a DLA depot and now encompasses approximately 85 acres. The contour of the depot property is generally flat, gently sloping towards the Ohio River to the west. The geographic coordinates of the depot are 38° 52' 14" north latitude and 82° 08' 06" west longitude.

The Point Pleasant Depot is bounded on the north by undeveloped land; to the east by a residential neighborhood; vacant manufacturing buildings are located to the south; and the Ohio River and Old Town Creek border the depot to the west and northwest. A railroad runs along the eastern boundary, and railroad tracks transverse the depot property. According to depot personnel, depot property extends beyond the western fenceline to the Ohio River.

This depot is an unmanned satellite of the DLA Strategic Materials Depot at Warren, OH. The property is owned by the General Services Administration (GSA). DLA operations within the Point Pleasant Depot include only the storage and handling of ferrochrome and ferromanganese metals. These materials are stored outside in open areas.

This SWPPP/GPP applies to the current property and the storm water drainage system located on the property, and groundwater beneath the surface of the depot property.

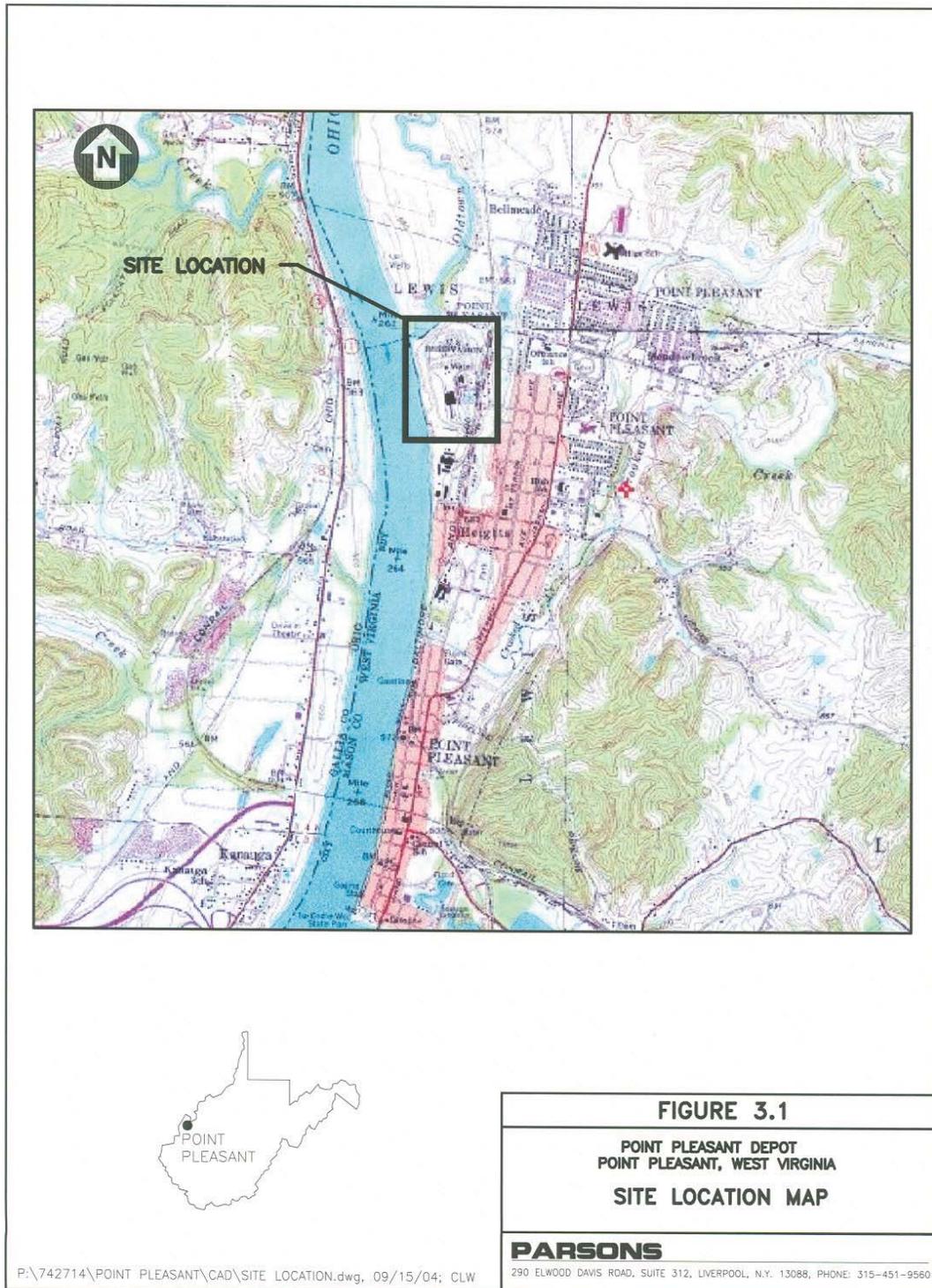
Maps are included in this SWPPP/GPP depicting the depot, its storm water system and other attributes:

- **Figure 3.1 – Site Location Map.** A topographic map of the site and surrounding vicinity taken from a United States Geological Survey (USGS) quadrangle map, showing nearby features including roads, developed areas, bodies of water and the depot's boundary.
- **Figure 3.2 – Point Pleasant Depot Map.** Shows the entire depot with current property boundaries, approximate location of stockpiles and buildings, surface flow direction, Areas of Concern, the storm water drainage system outfalls, and other features.

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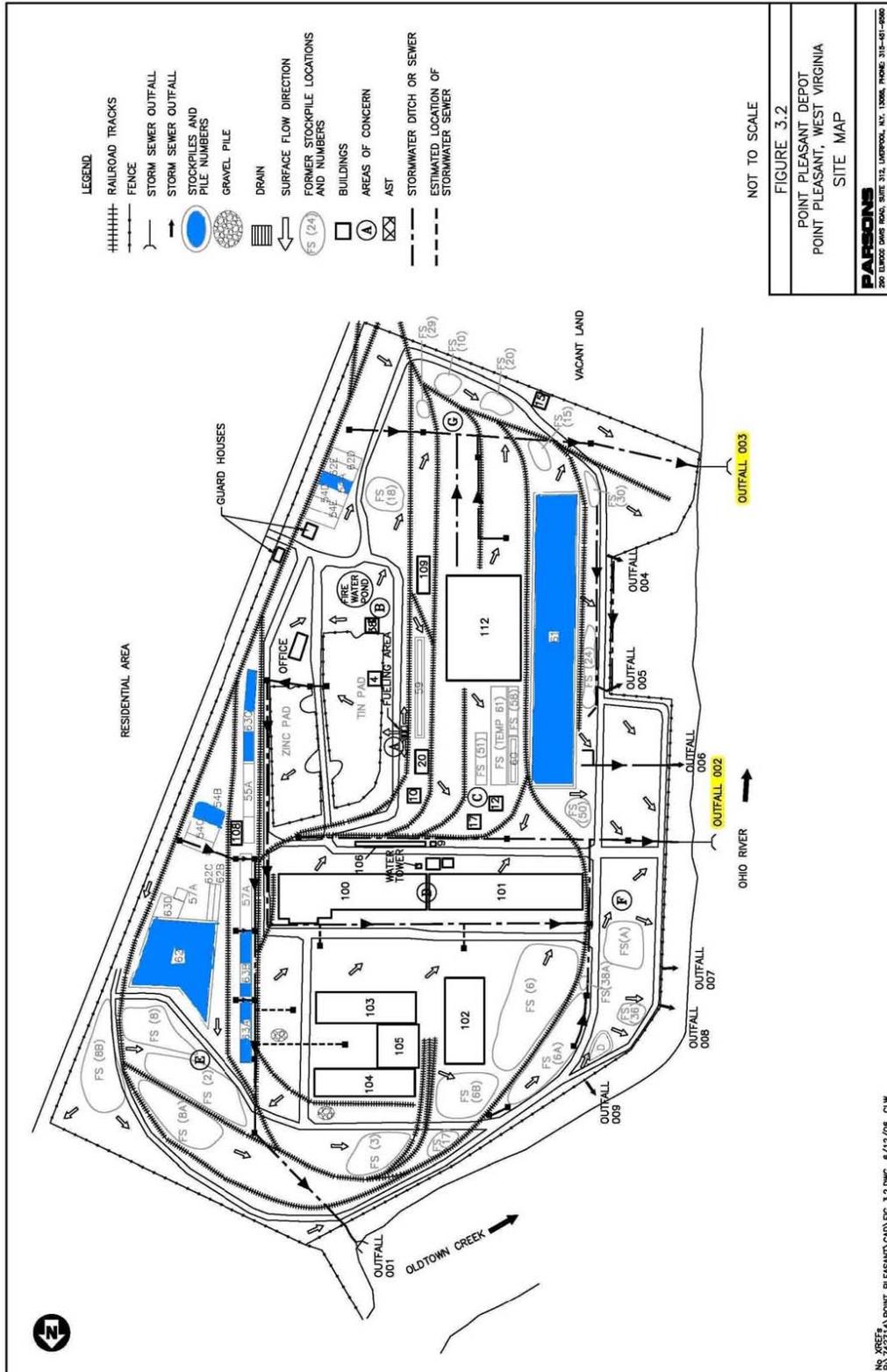
Figure 3.1: Site Location Map



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Figure 3.2: Point Pleasant Depot Map



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3.1.2 Storm Water Management System

The storm water drainage system at the Point Pleasant Depot is comprised of a network of grass-lined surface swales, roadside ditches and underground storm sewers. Storm water runoff leaves the depot property via one of numerous outfalls, as detailed below. The depot drainage system is shown on Figure 3.2.

3.1.3 Established Outfalls at Point Pleasant Depot

Storm water runoff is conveyed through outfalls. Each outfall discharges through a concrete pipe beyond the depot fenceline, emptying onto partially-vegetated rocky swales which then flow into receiving waters.

Outfall 001

Storm water Outfall 001 is located outside the depot's northwest fenceline and discharges into Old Town Creek, which empties into the Ohio River. The underground storm sewer system for this outfall collects storm water runoff from the northeast portion of the depot, and may receive runoff from nearby ferrochrome stockpile 62. Minor contributions of runoff are likely from non-depot property to the north.

The total estimated drainage area for Outfall 001 is 1,100,000 square feet, excluding any non-depot property. Most surfaces in the Outfall 001 drainage area are pervious soils or gravel, with surface vegetation. Less than ten percent of the total drainage area is covered with an impervious surface (i.e., concrete slabs, pavement, rooftops), resulting in a low runoff coefficient. Stockpile 62 is uncovered and located on impervious concrete, resulting in almost complete conversion of all precipitation into surface runoff in this small area.

Outfall 002

Storm water Outfall 002 is located outside the midpoint of the west fenceline and discharges into the Ohio River. The underground storm sewer system for this outfall may receive runoff from ferromanganese stockpile 61 and ferrochrome piles 54B, 63 A and B. Storm water inlets near this storage area provide a direct discharge route for storm water runoff.

This outfall also appears to receive storm water runoff from the northern portion of the depot, as well as central areas of the depot where roads and numerous buildings are located. Minor contributions of stormwater runoff are likely from non-depot property.

The total estimated drainage area for Outfall 002 is 1,500,000 square feet, excluding any non-depot property. Most surfaces in the Outfall 002 drainage area are pervious soils or gravel, with surface vegetation. Approximately 10 to 15 percent of the total drainage area is covered with an impervious surface (i.e., concrete slabs, pavement, rooftops), resulting in a low runoff coefficient.

Piles are uncovered and located on impervious concrete, resulting in almost complete conversion of all precipitation into surface runoff in these small areas. Some storm water runoff from stockpile 61 may enter storm water inlets and be discharged offsite.

Outfall 003

Storm water Outfall 003 is located outside the depot's southwest fenceline and discharges into the Ohio River. The underground storm sewer system for this outfall may receive runoff from ferrochrome stockpiles 54A, 63C and potentially from ferromanganese stockpile 61. Storm

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water inlets near these commodity storage areas provide a direct discharge route for storm water runoff. This outfall also receives runoff from numerous buildings and roadways onsite, and due to the size of this concrete outfall, it likely receives contributions of upstream, offsite storm water.

The total estimated drainage area for Outfall 003 is 900,000 square feet, excluding any non-depot property. Most surfaces in the Outfall 003 drainage area are pervious soils or gravel, with surface vegetation. Less than ten percent of the total drainage area is covered with an impervious surface (i.e.: concrete slabs, pavement, rooftops), resulting in a low runoff coefficient.

Ferromanganese stockpile 61 is uncovered and located on impervious concrete, resulting in almost complete conversion of all precipitation into surface runoff in this small area. The runoff from these stockpiles is either contained by roads or railroads, resulting in evaporation or infiltration, or is diverted to nearby storm water inlets. Ferrochrome stockpiles 54A and 63C are uncovered. These stockpiles are located on impervious concrete, resulting in almost complete conversion of all precipitation into surface runoff in these small areas. Some storm water runoff may enter storm water inlets and be discharged offsite.

3.1.4 Other Outfalls at Point Pleasant Depot

The former SWPPP/GPP for this depot indicated that four vegetated ditches were located in areas along the western fenceline that receive drainage from localized grassy areas and that no significant materials are stored in the limited drainage areas of these ditches. Also, runoff from the grassy area in the extreme northeast corner of the depot discharges directly through the fence as overland flow; however, the runoff appeared localized and not likely to contain contamination from nearby stockpiles, as drainage was not in this direction.

A consultant observed at least six unmonitored outfalls during an April 2004 site visit, in addition to the three outfalls outlined in Section 3.1.3. The six unmonitored outfalls are described below, and it is likely that the four above-mentioned vegetated ditches discharge into these additional outfalls.

- **Outfalls 004 and 005:** Two culverts are located along the roadway at the fence opposite Pile 61, one at each corner of the fence; a steel pipe referred to as Outfall 004 (southern-most) and a concrete pipe designated as Outfall 005. A railroad separates both culverts and their drainage swales from Pile 61; however, storm water runoff from Pile 61 likely contributes to these outfalls. The total drainage area for Outfall 004 is approximately 25,000 square feet; the total drainage area for Outfall 005 is approximately 75,000 square feet. Most surfaces in both drainage areas are pervious soils or gravel with surface vegetation, with less than ten percent of the total drainage area covered with an impervious surface. This results in a low runoff coefficient for each drainage area.
- **Outfall 006:** A clay discharge pipe located along the western fence, west of the south end of a former Pile B. Swales connecting with this outfall collect runoff from Pile 61 and convey it to this outfall. The total drainage area for Outfall 006 is approximately 50,000 square feet. Most surfaces in the drainage area are pervious soils or gravel with surface vegetation, with less than ten percent of the total

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drainage area covered with an impervious surface. This results in a low runoff coefficient.

- **Outfall 007:** This outfall consists of a PVC pipe, located directly west of old Stockpile A. The total drainage area for Outfall 007 is approximately 30,000 square feet. Most surfaces in the drainage area are pervious soils or gravel with surface vegetation, with less than ten percent of the total drainage area covered with an impervious surface. This results in a low runoff coefficient.
- **Outfall 008:** This outfall consists of a clay pipe located near the fence gate opposite old Pile 36. At the time of the April 2004 site visit, the outfall was approximately 50% blocked by vegetation and sediment. Runoff from old former nearby stockpiles A, C, D and 36 likely were contributing storm water runoff to this outfall. The total drainage area for Outfall 008 is approximately 30,000 square feet. Most surfaces in the drainage area are pervious soils or gravel with surface vegetation, with less than ten percent of the total drainage area covered with an impervious surface. This results in a low runoff coefficient.
- **Outfall 009:** A pipe outfall located along the northwest fenceline of the depot, north of Outfall 008 and at the base of the hillside adjacent to the perimeter fence. At the time of the site visit, this outfall appeared (in 2004) entirely blocked by vegetation and sediment; therefore, it likely conveys very little to no runoff from the depot. The total drainage area for Outfall 009 is approximately 25,000 square feet. Most surfaces in the drainage area are pervious soils or gravel with surface vegetation, with less than ten percent of the total drainage area covered with an impervious surface. This results in a low runoff coefficient.

3.1.5 Substantially Identical Effluents

Discharge from two outfalls (002 and 003) are sampled bi-annually, per WV/NPDES regulations. The discharge from each of the unmonitored outfalls (001, 004, 005, 006, 007, 008 and 009) at the Point Pleasant Depot is considered substantially identical to the discharge from Outfall 002. Thus, discharge monitoring data from Outfall 002 applies to Outfalls 001, 004, 005, 006, 007, 008 and 009, because the industrial activity, stored materials and management practices are substantially similar for each drainage area. Outfall 002 potentially receives runoff from manganese stockpile 61. The unmonitored outfalls potentially receive runoff from corresponding areas as follows:

- Outfall 001 – Pile 62.
- Outfalls 004 thru 009 – Pile 61.

Additionally, the observed discharge from each Outfall 004 through 009 is substantially less than the discharge from Outfall 002. Often, there is little to no measurable runoff observed from Outfalls 004 through 009 due to the limited size of their respective drainage areas.

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3.1.6 Additional Drainage Features

Two storm drains inlets are present along the perimeter road on the north side of the depot. These inlets are located northeast of old Pile D and northwest of Building 102, and are not depicted on other available depot maps. These inlets are believed to connect to the storm sewer system near old stockpiles A and D that drained into Outfall 002. Contribution of runoff from stockpiles to these storm drain inlets is not likely. Discharge at the northeast corner of the depot may exist as discussed in the previous SWPPP/GPP.

3.1.7 Storm Water Runoff / Groundwater Contamination

Storm water runoff gradually infiltrates into the soil, recharging shallow groundwater. The Point Pleasant Depot has no underground storage tanks (USTs) or other buried structures that could pose a threat to groundwater. Any contamination entering the shallow groundwater is expected to eventually end up in nearby streams and rivers, potentially affecting the quality of water which is a resource for both wildlife and humans. Groundwater is not used for drinking water purposes at the depot. Additionally, there are no groundwater wells onsite to act as potential pathways or conduits to groundwater were a release to occur at the depot facility.

3.2 POLLUTION PREVENTION COMMITTEE

Each SWPPP/GPP must identify a specific individual or individuals within the facility organization as members of a storm water Pollution Prevention Committee (PPC) that are responsible for developing the SWPPP/GPP and assisting the DFM in its implementation, maintenance and revision. The SWPPP/GPP 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/GPP.

When establishing a PPC, 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 PPC 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 PPC Organization

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

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

The Point Pleasant Depot PPC is identified in Table 3.1.

In the event that a member of the PPC 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 PPC member's position.

3.3 FORMS

Appendices A and B contain three forms that will be completed by the PPC:

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- Quarterly Site Compliance Report (Appendix B - completed every three months, as required by WV/NPDES permit)
- Spills and Leaks Form (Appendix A - completed as required, and at least annually)
- Storm water visual examination form (Appendix B - completed bi-annually).

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

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**Table 3.1
 POLLUTION PREVENTION TEAM**

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

Member	Responsibilities
<p>John Eller, Facility Manager, Team Leader (W): (330) 652-1456</p>	<ul style="list-style-type: none"> · Coordinates all stages of SWPPP/GPP development and implementation. · Coordinates employee training programs. · Conducts or contracts inspection and certification of non-storm water discharges, as required. · Manages and oversees SWPPP activities. · Coordinates SWPPP/GPP updates as needed. · Maintains all records and submits reports, as necessary. · Maintains updated spill records and updates the SWPPP/GPP to reflect any spills that occurs onsite.
<p>Jason Boynton, Safety & Health Manager (W): (703) 767-7592</p>	<ul style="list-style-type: none"> · Provides HQ support to SWPPP activities. · Assists in tracking and sampling efforts.

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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 AOC, if there is the potential for storm water or groundwater quality to be impacted. Areas of Concern at the Point Pleasant Depot (Figure 3.2) include the following:

Commodity Storage - The following AOCs are outfall drainage areas containing one or more stockpiles of ferrochrome or ferromanganese. All stockpiles are exposed to precipitation.

Commodities exposed to precipitation are stored on concrete. Runoff from these stockpiles may pick up precipitates and dissolved constituents 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 and dissolved constituents from the commodity, and potentially cause contamination of the groundwater; runoff containing precipitates and dissolved constituents that discharge to outfalls at the depot may also carry these contaminants into the receiving body of water.

The following AOCs, E, F and G, each contain several commodity stockpiles. Storm water runoff from the stockpiles may infiltrate into the ground, or flow into swales that empty into the outfalls. Table 3.2 lists each stockpile, drainage outfall, stockpile number and material, approximate stockpile dimensions, and surrounding surfaces.

- E. Areas draining to Outfall 001:** Includes ferrochrome stockpile Numbers 62, , 63c,. These stockpiles consist of ferrochrome, are uncovered and are located on concrete pads and gravel pads, as noted on Table 3.2. Two gravel piles are also present in the drainage area, near Building 104.
- F. Areas draining to Outfall 002:** Includes uncovered ferromanganese stockpile 61 and ferrochrome stockpile Numbers 63a, 63b and 54b.
- G. Areas draining to Outfall 003:** Includes uncovered stockpile 61 (ferromanganese), and ferrochrome stockpile 54A.

3.4.1 Former Stockpile Locations

Several stockpiles have previously been removed from the depot. Table 3.3 lists the stockpiles and the commodities formerly stored onsite at the depot, along with the outfall drainage area in which they were located.

3.4.2 BMPs at Areas of Concern

Best management practices (BMPs) are discussed in Section 4, and BMPs utilized for the above-mentioned AOCs are detailed on the quarterly site compliance report forms, presented in Appendix B. Briefly, the following BMPs are in effect at each Point Pleasant 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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- **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** – No pesticide or herbicide use is permitted.

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Table 3.2 Outdoor Commodity Stockpiles and Miscellaneous Materials Point Pleasant Depot, Point Pleasant, WV							
Pile No.	Material	Approximate Dimensions			Covered or uncovered	Surrounding Surface	Outfall
		Width (feet)	Length (feet)	Height (feet)			
54*	Ferrochrome (2)	250	50	25	uncovered	Concrete	002, 003
61	Ferromanganese	600	140	40	uncovered	Concrete	002, 003
62	Ferrochrome	350	150	50	uncovered	Concrete	001
63*	Ferrochrome (3)	120	115	30	uncovered	Concrete	002, 003
	Gravel	(2 piles near Bldg. 104)			uncovered	Gravel	001

Stockpile dimensions estimated April 2010

Diameter indicates diameter in feet.

* - These piles have been split up and relocated as noted on Figure 3.2.

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Table 3.3 Former Commodity Stockpiles Point Pleasant Depot, Point Pleasant, WV		
Pile No.	Commodity	Outfall
A	Manganese	002
B	Manganese	002
C	Manganese	002
2	Chrome	001
3	NA	001
6	NA	002
6A	NA	002
6B	(Drum disposal area)	002
8	Chrome	001
8A	Chrome	001
8B	Chrome	001
10	NA	003
11	Manganese	002
15	Manganese	003
17	NA	001
18	NA	003
19	Manganese	003
20	Manganese	003
24	NA	003
29	Manganese	003
30	NA	003
36	Manganese	002
38A	Manganese	002
50	NA	002
51	NA	002
52	Ferrochrome	002
53	Ferrochrome	002
58	NA	002
Temp. 61	Ferromanganese	002

NA indicates Not Available

- **Illicit Discharge Connections** - There are no known illicit discharge connections to the storm water drainage system. According to information obtained from the depot in April 2010, a review of facility drawings, and discussions with depot personnel, illicit connections to the storm sewer system are not present.
- **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.

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- **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

The WV/NPDES permit requires that records of all preventative maintenance inspections, employee training sessions, quarterly site compliance reports, bi-annual visual reports, and bi-annual storm water monitoring be retained for a minimum of three years after the expiration date of the permit.



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SECTION 4

BEST MANAGEMENT PRACTICES

Operators of regulated MS4s are required by the terms of the WV/NPDES permit to develop and implement a SWPPP/GPP 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 facilities with storm water drainage systems, including the Point Pleasant Depot.

4.1 EXISTING SOURCE CONTROLS

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

- **Good Housekeeping** – A clean and orderly work area reduces the possibility of accidental spills and can reduce safety hazards to everyone. Well-maintained material storage areas will reduce the possibility of storm water mixing with pollutants. Some simple procedures applicable to promote good housekeeping include:
 - Prompt clean up of spills and debris
 - 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** – Removal of vehicles formerly kept on the depot has eliminated the impact of vehicle maintenance activities on storm water discharge.

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Commodity Stockpile Maintenance and Outloading – Commodity stockpiles present significant potential for impacting storm water and groundwater quality. **Whenever commodities are moved** certain measures are in place to prevent contaminants from entering storm water runoff. Prior to beginning outloading operations:

- Workers 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, are to 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.
 - Surface runoff that flows towards nearby drainage ditches, swales, streams, etc., should also be similarly blocked.
 - These activities are to 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 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** – Applying a painted notice on or nearby storm drain inlets can increase awareness that the storm drainage system flows to a body of water, and not to a treatment facility. Lettering (i.e., “Dump No Waste, Drains to River” or “Only Rain in the Drain”) or graphics placed at the curb or pavement adjacent to storm drains can lead people to refrain from dumping wastes into the storm drainage system by informing the community of where the drain discharges.
 - **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 and of groundwater. 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 the "I Am The Key" link located at <https://www.dnsc.dla.mil/iamthekey/>.

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- **Illicit discharge connections** – There are no known illicit discharge connections at the Point Pleasant depot. According to information obtained from the depot during a site visit in April 2004, a review of facility drawings, and discussions with depot personnel, there do not appear to be any illicit connections to the storm sewer system.
- **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 our SPCC Plan. The methods by which chemicals are stored, handled and used at the facility can contribute to storm water contamination. Recommendations for the proper management of chemicals include the following:

- Storage of ice-melting salt indoors or within covered areas
- Maintaining adequate spill control equipment and supplies onsite
- Training facility personnel in materials management, and spill control and response
- Reduce, reuse and recycle all materials whenever possible



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4.2.2 Structural BMPs

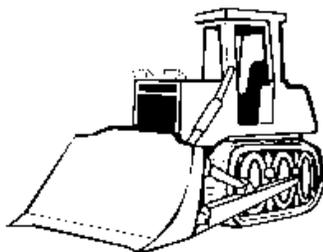
In addition to the non-structural BMPs listed above, structural BMPs can be implemented when new or completely rebuilt systems are installed. Structural BMPs such as the ones listed below are designed to allow runoff to gradually infiltrate into the ground instead of being released into a body of water.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

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

Minimizing directly connected impervious surfaces (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

No construction is foreseen at the depot.



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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 is discharged to a storm water drainage system. The following are examples of non-storm water discharges typically authorized by a SPDES or NPDES permit:

- 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 POINT PLEASANT DEPOT

There are no non-storm water discharges at the Point Pleasant.

5.3 INSPECTION OF STORM WATER DRAIN INLETS

According to information obtained from the depot in April 2010, a review of facility drawings, and discussions with depot personnel, there do not appear to be any illicit connections to the storm sewer system.

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APPENDIX A

SPILLS AND LEAKS FORM

SPILLS AND LEAKS FORM

DLA Point Pleasant 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: _____

APPENDIX B

QUARTERLY SITE COMPLIANCE REPORT

DIRECTIONS FOR COMPLETION OF QUARTERLY SITE COMPLIANCE REPORT

POINT PLEASANT DEPOT

There are two elements you must consider to fulfill the DNSC and WV/NPDES quarterly reporting requirement:

1. Routine visual inspection of your storm water system and all areas of the depot where potential exposure of AOCs exists; and
2. Completion of the Quarterly Site Compliance Report. (*Note:* DNSC policy requires an annual compliance report, but WVDEC regulations mandate quarterly reporting.)

1. ROUTINE VISUAL INSPECTIONS

The routine visual inspections are not meant to be a comprehensive evaluation of the entire storm water and groundwater 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 groundwater and/or storm water runoff from pollutants at the depot.

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 storm water drainage 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 quarterly site compliance report and inspection, and the bi-annual visual inspections required by the WV/NPDES permit.

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/GPP. If you see a situation that requires immediate action, act responsibly. Fix the problem or contact personnel who can.

2. COMPLETION OF THE QUARTERLY SITE COMPLIANCE REPORT

Information for this report should be collected every three months. The completed forms should be submitted to [Chief Environmental Management Division](#) (currently Steve Surface) within two weeks of the completion of each quarterly form.

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

1. The evaluator should be the Pollution Prevention Committee 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 Quarterly 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 groundwater or storm water runoff. Include issues from neighboring non-DNSC 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.

Mention any other issue or recommendation relating to storm water runoff. Include knowledge of any issues relating to contamination of storm water runoff from non-DNSC property that may affect the depot's drainage system.

QUARTERLY SITE COMPLIANCE REPORT

DLA / DNSC POINT PLEASANT DEPOT

WV/NPDES requires completion every three months. Use additional sheets if necessary.

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

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

3. INCIDENTS: Address compliance with the SWPPP/GPP, 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 groundwater and 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/GPP. Copies must also be furnished to [Chief Environmental Management Division](#).

EVALUATION FORM FOR THE QUARTERLY SITE COMPLIANCE REPORT

Areas of Concern A, B and C: ASTs at Vehicle Fueling Area (VFA) and pump house (Building 12); stored fluids in maintenance garage (Building 38).

DNSC Point Pleasant Depot

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

<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If “No”, Add Comments, Explanations (additional space on page 2)
Pollutants of Concern	Fuel products (gasoline and diesel fuel) at VFA and Bldg. 38; oil and anti-freeze in Bldg. 12.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storage Type and Location	Two (2) ASTs at VFA situated on concrete pad, one AST located inside Bldg. 38. Fluids in drums in Bldg. 12.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Existing Storm Water Management Controls	ASTs at VFA have secondary containment and overhead cover; spill kits in Bldg. 20, Bldg. 38 and at VFA.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Material Exposed to Storm Water Runoff?	Potentially	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Visual Observations of Site Drainage	Runoff infiltrates ground or flows into storm water drainage inlets or 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	Storm drains are or will be clearly marked.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

EVALUATION FORM FOR THE QUARTERLY SITE COMPLIANCE REPORT

Areas of Concern A, B and C - DNSC Point Pleasant Depot. Page 2 of 2

<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If "No", Add Comments, Explanations (additional space at bottom)
Proper Herbicide and Pesticide Use	Applications are in compliance with DNSC 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	Areas are kept swept and free of debris.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/>
Ditch Cleaning	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: _____

This form completed by: _____

Signature: _____ Date: _____

Completed copies of this report, the Quarterly Site Compliance Report and the evaluation form for each area of concern must be kept with the SWPPP/GPP. Copies must also be furnished to **Chief Environmental Management Division**.

EVALUATION FORM FOR THE QUARTERLY SITE COMPLIANCE REPORT

Area of Concern D

Solid Waste Bins (Dumpsters)

DNSC Point Pleasant Depot

The purpose of this form is to document 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>	If “No”, Add Comments, Explanations (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 between buildings 100 and 101.	<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. Dumpster does not have a lid.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Material Exposed to Storm Water Runoff?	In a water-tight container	<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	_____
<i>Best Management Practices In Place</i>			
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	Storm drains are or will be clearly marked.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Proper Herbicide and Pesticide Use	Applications are in compliance with DNSC Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

EVALUATION FORM FOR THE QUARTERLY SITE COMPLIANCE REPORT

Area of Concern D - Solid Waste Bins - DNSC Point Pleasant Depot. Page 2 of 2

<i>Physical Characteristics</i>	<i>Existing Status</i>	<i>Current Status the Same?</i>	If "No", Add Comments, Explanations (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	<hr/> <hr/> <hr/> <hr/> <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/> <hr/> <hr/> <hr/> <hr/>
Ditch Cleaning	Ditches are free of debris and proper flow is maintained in ditches.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<hr/> <hr/> <hr/> <hr/> <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/> <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/> <hr/> <hr/> <hr/> <hr/>

Additional Comments: _____

This form completed by: _____

Signature: _____ Date: _____

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

EVALUATION FORM FOR THE QUARTERLY SITE COMPLIANCE REPORT

Areas of Concern E – G

Commodity Stockpiles and Storage Locations - DNSC Point Pleasant Depot

The purpose of this form is to document the pre-existing conditions at these AOCs, and to document 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 (i.e., 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, Explanations (use page 2 or extra sheet if needed)
Pollutants of Concern	Ferrochrome, manganese and ferromanganese stockpiles; tin and zinc ingots. Gravel and wood pallet storage.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Storage Type and Location	24 stockpiles & two storage pads as detailed on Table 3.2.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Existing Storm Water Management Controls	Railroad ties provide containment.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Material Exposed to Storm Water Runoff?	Yes, except covered Piles 54 and 55.	<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	_____
<i>Best Management Practices In Place</i>			
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	Storm drains are or will be clearly marked.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
Proper Herbicide and Pesticide Use	Applications are in compliance with DNSC Pest Management Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

