

Stormwater Pollution Prevention Plan for:

Bradford Industries
75 Rogers Street
Lowell, MA 01852
Facility telephone: (978) 459-4100

SWPPP Contact(s):

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Contents

SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION	1
1.1 Facility Information.....	1
1.2 Contact Information/Responsible Parties.....	2
1.3 Stormwater Pollution Prevention Team.....	3
1.4 Activities at the Facility.....	4
1.5 General Location Map.....	6
1.6 Site Map.....	6
SECTION 2: POTENTIAL POLLUTANT SOURCES	9
2.1 Industrial Activity and Associated Pollutants.....	9
2.2 Spills and Leaks.....	9
2.3 Non-Stormwater Discharges Documentation.....	11
2.4 Salt Storage.....	13
2.5 Sampling Data Summary.....	13
SECTION 3: STORMWATER CONTROL MEASURES	13
3.1 Minimize Exposure.....	13
3.2 Good Housekeeping.....	15
3.3 Maintenance.....	15
3.4 Spill Prevention and Response.....	16
3.5 Erosion and Sediment Controls.....	19
3.6 Management of Runoff.....	19
3.7 Salt Storage Piles or Piles Containing Salt.....	19
3.8 MSGP Sector-Specific Non-Numeric Effluent Limits.....	20
3.9 Employee Training.....	21
3.10 Non-Stormwater Discharges.....	22
3.11 Waste, Garbage and Floatable Debris.....	22
3.12 Dust Generation and Vehicle Tracking of Industrial Materials.....	23
SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING	23
SECTION 5: INSPECTIONS	25
SECTION 6: DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS	29
6.1 Documentation Regarding Endangered Species.....	29
6.2 Documentation Regarding Historic Properties.....	29
6.3 Documentation Regarding NEPA Review.....	29
SECTION 7: SWPPP CERTIFICATION	30
SECTION 8: SWPPP MODIFICATIONS	32

Attachment A – Site Location Map
Attachment B – Site Map
Attachment C – 2008 MSGP

- Attachment D – Reportable Quantity (RQ) List
- Attachment E – Release Notification Form (RNF)
- Attachment F – Inspection Forms and Training Documentation
- Attachment G – Stormwater Monitoring Data

SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Bradford Industries

Street: 75 Rogers Street

City: Lowell

State: MA ZIP Code: 01852

County or Similar Subdivision: Middlesex County

Permit Tracking Number: _____ (if covered under a previous permit)

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude:

Longitude:

1. ° ' " N (degrees, minutes, seconds)

1. ° ' " W (degrees, minutes, seconds)

2. 42° 38.00.0' N (degrees, minutes, decimal)

2. 71° 17.57.6' W (degrees, minutes, decimal)

3. _____ ° N (decimal)

3. _____ ° W (decimal)

Method for determining latitude/longitude (check one):

USGS topographic map (specify scale: _____)

EPA Web site

GPS

Other (please specify): Google Earth Web-site

Is the facility located in Indian Country? Yes No

Yes

No

If yes, name of Reservation, or if not part of a Reservation, indicate "not applicable."

Is this facility considered a Federal Facility?

Estimated area of industrial activity at site exposed to stormwater: 9.49 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? Yes No

If yes, name of MS4 operator: Lowell Regional Wastewater Utility

Name(s) of water(s) that receive stormwater from your facility Concord River

Are any of your discharges directly into any segment of an "impaired" water? Yes No

If Yes, identify name of the impaired water (and segment, if applicable): Concord River

Identify the pollutant(s) causing the impairment: Metals, Nutrients

For pollutants identified, which do you have reason to believe will be present in your discharge? None

For pollutants identified, which have a completed TMDL? None Do you discharge into a receiving water designated as a Tier 2 (or Tier 2.5) water? Yes

No

Are any of your stormwater discharges subject to effluent guidelines? Yes No

If Yes, which guidelines apply? _____

Primary SIC Code or 2-letter Activity Code: 2295
(refer to Appendix D of the 2008 MSGP). A copy of the 2008 MSGP is provided as Attachment C.

Identify your applicable sector and subsector: Sector V Subsector V1; SIC Codes 2211-2299; Textile Mill Products

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: John Bernier
Address: 75 Rogers Street
City, State, Zip Code: Lowell, MA 01852
Telephone Number: (978) 459-4100
Email address: bernier@bradfordind.com
Fax number: (978) 459-8725

Facility Owner (s):

Name: Wembly Enterprises
Address: 931 Briarwoods Road
City, State, Zip Code: Franklin Lakes, NJ 07417
Telephone Number: N/A
Email address: N/A
Fax number: N/A

SWPPP Contact:

Name: John Bernier

Telephone number: (978) 459-4100
 Email address: bernier@bradfordind.com
 Fax number: (978) 459-8725

1.3 Stormwater Pollution Prevention Team

The Pollution Prevention Team for the Bradford Industries facility consists of the following personnel:

Name	Title	Date(s) Assigned to Stormwater Pollution Prevention Team
Mr. John Bernier	Manufacturing Manager	July 2019
	Environmental Engineer	
Mr. Charlie Lojek	Maintenance Supervisor	August 2015
Mr. Luis Sousa	Environmental Technician	August 2015

This team is responsible for implementing, maintaining, and updating the Stormwater Pollution Prevention Plan. Each member will be familiar with this plan and will be responsible for those issues described below.

- Identifying potential new sources of stormwater pollution from industrial activities as they occur or are planned due to facility upgrades or routine maintenance activities.
- Initiating revision of the Stormwater Pollution Prevention Plan, or any component thereof, if substantial changes have been made with respect to stormwater discharges from industrial activities.
- Reviewing and improving best management practices to minimize sources of stormwater pollution and taking corrective actions where required.

Staff Names	Individual Responsibilities
Mr. John Bernier Manufacturing Manager	<input type="checkbox"/> Assures appropriate funding to implement and maintain stormwater pollution prevention control measures and best management practices. <input type="checkbox"/> Designates and/or makes changes to personnel assigned to the stormwater pollution prevention team.
Environmental Engineer	<input type="checkbox"/> Performs a periodic review and revision of the Stormwater Pollution Prevention Plan, as required by regulation, site conditions, inspections, or stormwater monitoring results.

	<ul style="list-style-type: none"> <input type="checkbox"/> Ensures completion of, and documents annual stormwater management training. <input type="checkbox"/> Ensures stormwater pollution prevention team members conduct required monthly inspections, quarterly visual assessments and annual comprehensive site inspections as well as required annual stormwater sampling and analysis. <input type="checkbox"/> Performs a technical review of stormwater monitoring data and ensures electronic submittal of stormwater results within 30 days of receipt of analytical data. <input type="checkbox"/> Serves as the point-of-contact for plant personnel and regulatory personnel for assuring compliance with the Industrial Stormwater General Permit.
	<ul style="list-style-type: none"> <input type="checkbox"/> Reviews and update facility procedures and work practices related to stormwater management, and validate the proper handling and storage of product material, chemicals, and waste that may be exposed to stormwater.
Mr. Charlie Lojek Maintenance Supervisor	<ul style="list-style-type: none"> <input type="checkbox"/> Conducts quarterly visual inspections and representative annual stormwater sampling. <input type="checkbox"/> Provides notification of planned changes in facility operations to the Environmental Manager that may impact stormwater quality.
Mr. Luis Sousa Environmental Technician	<ul style="list-style-type: none"> <input type="checkbox"/> Conducts quarterly visual inspections and representative annual stormwater sampling. <input type="checkbox"/> Provides notification of planned changes in facility operations to the Environmental Manager that may impact stormwater quality.

1.4 Activities at the Facility

Bradford occupies a 9.49 acre property at 75 Rogers Street in Lowell, Massachusetts. Bradford manufactures industrial polymer coated textiles. Specifically, the company manufactures silicone coated automotive airbag materials for the automotive industry; trim materials for truck manufacturers; fabrics for fashion, marine, home furnishings, and leather goods markets; and man-made leathers. It also provides silicone coated nylon and polyester for airbag textiles; polyurethane coated nylon and polyester for inflatable curtains, tubes, and side impact bags; and PVC and polyurethane coated fabrics for automotive seating and door panel applications. In addition, the company manufactures foams for earplugs, polymer coated fabrics used in industrial work products.

Industrial activities performed at the site involve application of coatings onto substrate polymer and fabric materials. Bradford Industries operates under a Standard Industrial Classification (SIC) Code of 2295. The activities covered under this SIC code are summarized below.

2295 Coated Fabrics, Not Rubberized

Establishments primarily engaged in manufacturing coated, impregnated, or laminated textiles, and in the special finishing of textiles, such as varnishing and waxing. Establishments primarily engaged in rubberizing purchased fabrics are classified in Industry 3069, and those engaged in dyeing and finishing textiles are classified in Industry Group 226 or Industry 2231.

- Buckram: varnished, waxed, and impregnated
- Cambric: varnished, waxed, and impregnated
- Cloth, varnished glass
- Coating and impregnating of fabrics, except rubberizing
- Fabrics, coated and impregnated: except rubberized
- Laminating of fabrics
- Leather, artificial or imitation
- Mats, varnished glass
- Metallizing of fabrics
- Oilcloth
- Plastics coated fabrics
- Pyroxylin coated fabrics
- Resin coated fabrics
- Sealing or insulating tape for pipe, fiberglass coated with tar or
- Sleeving, textile: saturated
- Tape, varnished: plastics and other coated: except magnetic-mfpm
- Tubing, textile: varnished
- Waxing of cloth
- Yarns, plastics coated: made from purchased yarns

Unit processes and/or operational practices at the facility that have the potential to impact stormwater quality include the following:

- Bulk delivery of commodity chemicals to fill ports on the western side of the building by commercial tanker trucks.
- Delivery of commodity chemicals in containers (55-gallon drums and 275 gallon totes) by commercial vendors.
- Periodic removal of waste materials including liquid hazardous waste and used oils by licensed hazardous waste transport and/or disposal vendors.
- Discharges of air pollutants to stacks and vents via permitted discharge vents/exhausts.

- Discharges of particulate matter from air filtration equipment.
- Delivery of bulk diesel fuel to a 175-gallon above ground storage tank that supports the emergency fire pump at the facility.
- Maintenance of dielectric oil filled electrical transformers.
- General plant air discharge to exhaust vents from the facility.
- Storage of trash and solid wastes in covered roll-off containers.
- Wintertime ice and snow control (e.g., sand and salt storage and application).
- Runoff from facility paved surfaces and portions of the building roof which discharge to the pavement.

1.5 General Location Map

Please see Attachment A for a site location map identifying the location of this facility and the location of the receiving water for stormwater discharges from this facility; the Concord River.

1.6 Site Map

Please see Attachment B for a detailed site map identifying the following site features.

Section 5.1.2 Parameter	Response
<input type="checkbox"/> the size of the property in acres;	9.49 acres
<input type="checkbox"/> the location and extent of significant structures and impervious surfaces;	Multi-part building and paved areas shown in Attachment B Site Map
<input type="checkbox"/> directions of stormwater flow (use arrows);	Shown in the Attachment B Site Map
<input type="checkbox"/> locations of all existing structural control measures;	Stormwater drains, paved areas, and bulk chemical unloading areas are shown in the Attachment B Site Map
<input type="checkbox"/> locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired and, if so, whether the waters have TMDLs established for them;	The location of the Concord River is shown in the Attachment A General Location Map. The Concord River from the Billerica Water Supply intake, Billerica to the Rogers Street bridge in Lowell is listed as impaired for metals, nutrients and exotic species which include Eurasian Water Milfoil and Non-Native Plants.

<p><input type="checkbox"/> locations of all stormwater conveyances including ditches, pipes, and swales;</p>	<p>Stormwater drains are shown in the Attachment B Site Map. No significant ditches or swales are present on the property. Note that several of the discharge conveyances are of undetermined origin, but are not anticipated to discharge significant quantities of stormwater runoff. Stormwater runoff is primarily via sheet flow from paved surfaces.</p>
<p><input type="checkbox"/> locations of potential pollutant sources identified under Part 5.1.3.2;</p>	<p>Locations identified in the Attachment B Site Map</p>
<p><input type="checkbox"/> locations where significant spills or leaks identified under Part 5.1.3.3 have occurred;</p>	<p>No spills or leaks reported or known to exist since 1987 at the time of Bradford Industries, Inc., incorporation.</p>
<p><input type="checkbox"/> locations of all stormwater monitoring points;</p>	<p>Sampling monitoring locations SW-1 to SW-4 are shown in the Attachment B Site Map</p>
<p><input type="checkbox"/> locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc), indicating if you are treating one or more outfalls as “substantially identical” under Parts 4.2.3, 5.1.5.2, and 6.1.1, and an approximate outline of the areas draining to each outfall;</p>	<p>A total of seven (7) discharge points labeled “A” through “G” were field identified along the embankment of the Concord River. With the exception of outfall “G”, no other outfalls are known to discharge stormwater runoff. The location and orientation of each outfall is provided in the Attachment B Site Map. Four drainage basins have been identified as DA-001, DA-002, DA-003, and DA-004 and are shown in the Attachment B Site Map. Stormwater drainage from the facility roof is directed to a combined storm and sanitary sewer drainage system underneath the facility.</p>
<p><input type="checkbox"/> municipal separate storm sewer systems, where your stormwater discharges to them;</p>	<p>Stormwater drainage from the majority of the facility roof is directed to the Lowell Regional Wastewater Utility sanitary sewer system. Areas where roof runoff may enter the stormwater drainage system on-site is shown in the Attachment B Site Map.</p>

<input type="checkbox"/> locations and descriptions of all non-stormwater discharges identified under Part 2.1.2.10;	Location of discharge conveyances that may receive groundwater and/or building footing/foundation drainage are shown in the Attachment B Site Map.
<input type="checkbox"/> locations of the following activities where such activities are exposed to precipitation:	N/A
<input type="checkbox"/> fueling stations;	Location of 175-gallon diesel fuel tank and emergency fire pump is provided in the Attachment B Site Map.
<input type="checkbox"/> vehicle and equipment maintenance and/or cleaning areas;	No vehicle maintenance or cleaning is conducted on the property.
<input type="checkbox"/> loading/unloading areas;	Bulk chemical loading and unloading locations and loading docks are shown in the Attachment B Site Map.
<input type="checkbox"/> locations used for the treatment, storage, or disposal of wastes;	With the exception of fully covered trash compactors/roll-off containers, no treatment, storage or disposal of wastes occurs at the facility in areas exposed to stormwater.
<input type="checkbox"/> liquid storage tanks;	The location of the 175-gallon diesel fuel AST, exterior electrical transformers, and hot oil systems are provided in the Attachment B Site Map.
<input type="checkbox"/> processing and storage areas;	The location of a trash compactors and roll-off containers are shown in the Attachment B Site Map. No other processing or storage areas are located in areas subject to stormwater impact.
<input type="checkbox"/> immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or byproducts used or created by the facility;	Location of paved areas and roadways in the immediate vicinity of the facility is provided in the Attachment B Site Map.
<input type="checkbox"/> transfer areas for substances in bulk; and	Two primary bulk transfer areas are located at the facility along the western side of the facility building. Each area is shown in the Attachment B Site Map.

<input type="checkbox"/> machinery; and	With the exception of transformers, the regenerative oxidizer no significant equipment is located at the plant in areas exposed to stormwater.
<input type="checkbox"/> locations and sources of run-on to your site from adjacent property that contain significant quantities of pollutants.	Stormwater run-on from Perry Street to the east of the property has the potential to impact stormwater quality. No other significant stormwater run-on occurs at the facility.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Bulk chemical loading/unloading areas	Plasticizers, nitrile latex
Commercial product delivery and hazardous waste disposal (inadvertent spills)	Mineral spirits, dyes, inks, solvents, petroleum oils, fabrics, resins and polymers, paper, commercial cleaning and janitorial products
Fuel delivery	Oil
Air filtration	Particulate matter
Exterior roll-off storage	Oil and grease, total suspended solids, nitrates/nitrites
Electrical Transformers	Dielectric fluid/oil
Roof-top vents and exhausts	Same as air filtration, also may include minute quantities of VOCs
Wintertime snow and ice control	Total suspended solids, sodium, chloride

As required for the Textile Mills, Apparel, and Other Fabric Product manufacturing sector Bradford has evaluated sector-specific sources and activities that have potential pollutants and has determined that either the following sources and/or activities are not present at the facility or are not subject to stormwater influence: backwinding, beaming, bleaching, backing bonding, carbonizing, carding, cut and sew operations, desizing, drawing, dyeing locking, fulling, knitting, mercerizing, opening, packing, plying, scouring, slashing, spinning, synthetic-felt processing, textile waste processing, tufting, turning, weaving, web forming, winging, yarn spinning, and yarn texturing.

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls: Sampling Point
Fire pump building fuel port	Sheet flow off pavement: SW-1
Trash compactor/roll-off container (leaks)	Sheet flow off pavement: SW-1
Exhaust vents	Sheet flow off pavement: SW-1
Spills in roadway during bulk product (tanker or container) delivery or during waste disposal events and from routine vehicular traffic and wintertime snow/ice control (sand/salt)	Sheet flow off pavement: SW-1
Spills from leaks/failures of electrical transformers	Sheet flow off pavement: SW-1
Bulk plasticizer chemical loading ports	To 3,000 gallon spill containment tank
Trash compactor/roll-off container (leaks)	Sheet flow off pavement: SW-2
Exhaust vents	Sheet flow off pavement: SW-2
Spills in roadway during bulk product (tanker or container) delivery or during waste disposal events and from routine vehicular traffic	Sheet flow off pavement: SW-2
and wintertime snow/ice control (sand/salt)	
Nitrile Latex Bulk Fill Port	Sheet flow off pavement: SW-3
Sand/salt storage	Sheet flow off pavement: SW-3
Spills at main loading dock	Sheet flow off pavement: SW-3
Exhaust vents	Sheet flow off pavement: SW-3
Spills in roadway during bulk product (tanker or container) delivery or during waste disposal events and	Sheet flow off pavement: SW-3

from routine vehicular traffic and wintertime snow/ice control (sand/salt)	
Exhaust vents	Sheet flow to ground: SW-4
Spills from C2K hot oil system heat exchanger	Sheet flow to ground: SW-4

Description of Past Spills/Leaks

There are no records of significant spills or leaks in the past 3 years at the site of oil or toxic or hazardous pollutants that actually occurred at exposed areas, or that drained to a stormwater conveyance.

2.3 Non-Stormwater Discharges Documentation

The General Permit requires that the SWPP Plan include a certification that the stormwater discharges authorized by the General Permit have been tested or evaluated for the presence of non-stormwater discharges or the presence of floor drains, which are connected to stormwater conveyances. The following are allowable non-stormwater discharges.

- Discharges from fire-fighting activities;
- Fire hydrant flushings;
- Potable water, including water line flushings;
- Uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling;
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed);
- Routine external building washdown that does not use detergents;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of your facility, but not intentional discharges from the cooling tower (e.g., “piped” cooling tower blowdown or drains).

Bradford discharges groundwater from a trench drain in the basement of the facility to two locations. The first is to a six-inch diameter PVC pipe at the southern end of the building in drainage area DA-003. This discharge point receives groundwater infiltration from the southern portion of the trench drain while the groundwater infiltration from the northern portion of the trench is hypothesized to discharge to outfall "F". In addition, as noted in Section 1.6 Bradford maintains several discharge conveyances along the embankment of the Concord River which are of undetermined origin. Bradford personnel indicate the discharge conveyances (pipes) are likely to be remnants from historic development of the 100 plus year old industrial property. While several of the pipes were observed to discharge water following a period of no precipitation, this discharge is inferred to be from groundwater dewatering which may originate from historic building drains and/or buried pipes on the property. The water quality of the groundwater has not been quantified as of the date of this report.

The certification must include the following information for each authorized discharge:

Criteria	Response
Date of evaluation:	December 2009
Description of the evaluation criteria used:	Review of available facility drawings, interview of Facility representatives and tour of plant to validate presence/absence of floor drains shown on the plan. Review and inspection of pavement surfaces and drainage features surrounding the facility.
List of the outfalls or onsite drainage points that were directly observed during the evaluation:	Outfalls "A", "B", "C", "D", "E", "F", and "G", pavement along entire western edge of the facility bordering the Concord River, visible floor surfaces inside facility.
Different types of non-stormwater discharge(s) and source locations:	Ground water intrusion potential at several outfalls due to flowing water conditions observed following at least three days of no precipitation (no stormwater) in November 2009.
Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. For example, a floor drain was sealed, a sink drain was re-routed to sanitary, or an NPDES permit application was submitted for an unauthorized cooling water discharge:	Prior to the 2009 stormwater review, Bradford personnel surveyed interior plant areas and sealed or bermed existing floor drains to prevent any inadvertent spills from entering the storm drainage system.

2.4 Salt Storage

Bradford maintains a small (<5 cubic yard) accumulation of salt for seasonal ice and snow control at its facility immediately adjacent and partially under the main loading dock at the facility. The location of the salt storage is shown in the Attachment B Site Map. Snow and ice removal (plowing) is provided by contract vendors.

2.5 Sampling Data Summary

Bradford will conduct the stormwater quality sampling during the first or second quarter of 2010.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

Bulk tank truck and container deliveries will be coordinated and monitored by assigned personnel to reduce the potential for a spill during unloading. Adequate spill containment, absorbent, and neutralizing materials will be made available at the facility to reduce the potential for stormwater contamination in the event of a bulk chemical or fuel oil spill. Procedures for loading/unloading of bulk chemicals and containerized materials are described in the Bradford Industries Spill Prevention Control and Countermeasure (SPCC) Plan. However, bulk deliveries of non-petroleum chemicals, such as nitrile latex is described below.

Deliveries of nitrile latex are presently conducted at a relatively infrequent basis; once every few months. To minimize the potential for spill events Bradford will deploy a portable spill containment berm in advance of each unloading event as follows.

General

1. Prevent persons from smoking and other fire hazards.
2. Obtain and deploy a portable spill containment berm that completely surrounds the bulk tanker truck.
3. Park vehicle as close as possible to the fill pipe receiving the product and use the minimum length of hose practicable.
4. Verify the entire vehicle is located within the portable containment berm.
5. The driver and a facility employee shall remain at the fill location during fueling.

Prior to Transfer:

6. Check all transfer hoses for leaks and wet spots. Only use hoses in good condition.
7. Verify that sufficient volume is available in the storage tank to receive the product.

8. Secure the loading vehicle wheel chocks. Make sure that the parking brakes of the truck are set.
9. Keep hose ends tightly capped while moving hoses.

During Transfer:

10. Shut off motors when making and breaking hose connections.
11. Monitor all hoses and hose couplings for leaks.
12. Monitor the liquid level in the receiving tank during filling operations to prevent overflow.
13. Do not top off tank. Provide free space within the tank to prevent leakage due to thermal expansion. Close valve connections if an overfill condition occurs and withdraw sufficient liquid from the tank, if possible, to permit complete drainage of the vent pipe and hose fill.

After Transfer:

14. Close all tank and loading valves before disconnecting.
15. Close all vehicle internal, external, and dome cover valves before disconnecting.
16. Make sure that all transfer operations are complete before disconnecting any transfer lines.
17. Remove any wheel chocks that have been used.
18. Prior to vehicle departure make sure that all connections, and fill lines are disconnected.
19. After the transfer lines are disconnected and prior to vehicle departure, inspect the outlets for evidence of leakage.
20. Make sure that the hoses or other connecting devices are drained, vented, or blown down to remove any liquid before moving them away from their connections.
21. Use a drip pan, pail, and/or absorbent pads when breaking a hose connection.
22. Cap the end of the hose or other connecting devices before moving them to prevent uncontrolled fuel leakage.
23. Cap associated hose risers.
24. Close all hose riser valves not in use.
25. Soak up any spilled oil in or around the fill box and secure the cover.
26. Collect any sorbent material generated for proper disposal.
27. Remove and store temporary containment

In the event of a fluid spill, hydrophobic, oil absorbent booms and pads will be available in adequate quantities to be deployed around the spill material on the pavement as a precautionary measure until the spill has been fully remediated. Specific spill containment and absorption materials are specified for both oil and chemical materials in the Bradford SPCC Plan.

Repairs or maintenance activities on portable equipment shall be performed, where possible, in an area of the plant outside of the influence of stormwater. When repair or maintenance procedures are performed in the open, work shall be done in such a manner so as to minimize spillage of fluids onto the ground.

Materials handled during operations shall be transferred directly to/from the vehicles at appropriate offloading areas. The potential for stormwater to contact handled materials will be minimized. A supply of absorbent materials shall be readily accessible at the site 24 hours a day to help contain spills. Materials shall be stored away from direct traffic routes to reduce the potential for accidental spills. In addition, materials shall be located with adequate aisle space to allow ease of movement and reduce the potential for spills.

3.2 Good Housekeeping

Good housekeeping and preventative maintenance is essential to ensure that the stormwater drainage system will function as designed and to reduce the potential for stormwater pollution. The recommended housekeeping and maintenance items listed below provide the foundation for an effective SWPP Plan.

- Sweeping of the grounds and litter control will be performed on an as needed basis.
- Motor vehicle fluids leaked from employee vehicles and/or vehicle traffic will be removed, the area decontaminated, and materials disposed of promptly in accordance with applicable regulations.
- Regular pickup and disposal of hazardous wastes and used oils will occur on a less than 90-day schedule to maintain status as a large quantity generator of hazardous waste.

3.3 Maintenance

Bradford has implemented a preventive maintenance program that ensures that air filtration and handling equipment are maintained to provide for proper continued operation. Bradford relies upon contract vendors to supply and replace covered roll-off containers for the temporary storage of trash and waste materials in the compactors at the facility. Additionally, the facility is staffed with well-trained personnel who keep the equipment in proper working order in accordance with normal equipment operation and maintenance procedures. This includes proper preventive maintenance, repairs, and operation of the equipment in the manner that was intended by the manufacturer. It also includes the proper operation and maintenance of the stormwater pollution prevention and control equipment located at the facility such as maintenance of adequate spill containment and absorbent supplies. The facility's preventive maintenance schedule is intended to ensure that the equipment remains in good working order and that pollution prevention objectives are achieved.

3.4 Spill Prevention and Response

Bradford maintains an emergency containment underground storage tank (UST) at the plasticizer bulk chemical fill port. Specifically, the UST consists of a concrete tank of approximate capacity of 3,000 gallons which is connected to a 10-inch diameter drain directly under the fill port. The outlet of the 10-inch diameter drain is fitted with a ball valve to allow drainage to the UST during fill events. At times where no bulk deliveries are on-going the ball valve is placed in the closed position to restrict stormwater accumulation in the UST.

In the event of a spill of a material that could be a potential source of stormwater pollution, trained facility personnel will perform emergency response actions to the extent the spilled material is known (e.g., oil), the spill is not beyond the capability of trained facility personnel and spill response supplies, and potential risk to human health and the environment is minimal. To the extent that a spill cannot be addressed by trained Facility staff, the Facility will contract with a licensed spill response contractor to respond to the spill. Section 2.2 of this Plan describes the potential pollutant sources at the Facility and identifies areas at the site where spills or leaks of significant materials could be exposed to stormwater. The following spill reporting procedures shall be implemented if a spill or release of oil or hazardous material is discovered.

1. Contact emergency services (911) if imminent threat of fire or other life-threatening situation.
2. Contact ambulance (Trinity at 978-441-9999) and Saints Memorial Hospital (978-458-1411) as necessary.
3. Immediately contact the Bradford Environmental Team at 978-459-4100 or the Production Manager at 978-459-4100 xt 368. After hours contact Luis Sousa at 978-770-7724 or Mr. Charlie Lojek at 978-423-7211. Identify the source of the leak or spill and attempt to stop the flow of oil, if practicable without endangering personnel.
4. Place sorbent materials and/or booms to prevent oil from reaching navigable waters. Sorbent materials and/or booms shall be placed at catch basins and drainage openings. Sorbent materials and/or booms should also be placed across down gradient pathways if necessary to impede the flow of oil.
5. Spill response supplies are stored at the approximate locations indicated in the Attachment B Site Map.
6. Spill cleanup materials shall be managed as oily debris and shall be removed off-site by a transporter licensed by the State of Massachusetts.

7. A discharge of oil into a waterway that results in a film or sheen upon the surface of the water must be reported immediately to the National Response Center (NRC) at (800) 424-8802.

An adequate supply of spill containment, absorbent, and neutralizing materials, consisting of pads, booms, granular absorbents, etc. will be maintained on-site in strategic locations. Specifically, Bradford will maintain spill response materials near the loading dock and will identify the location of the spill response materials to personnel in the event of a spill at other locations throughout the plant. Reportable spills will be documented and records retained at the facility. Spill reports will include the date and time of the incident, location, estimated volume and contents of spill, weather conditions, response procedures, and parties notified, as well as recommended revisions to the Best Management Practices (BMP) program, operating procedures, and/or equipment needed to prevent recurrence.

Hazardous Substance Reportable Quantity (RQ) Discharge

If a spill of a listed hazardous substance occurs to the environment (surface water, ground water, land, subsurface strata, or ambient air) in a quantity above CERCLA reportable quantities or if any quantity of such a release contacts navigable waters or wetlands, the facility will immediately report the incident to the MADEP. A summary of typical chemicals and reportable quantities are provided as Attachment D.

Discharges of reportable quantities require that any person in charge of the facility notify the National Response Center (NRC) [800-424-8802] in accordance with the requirements of 40 CFR 110, 40 CFR 302 and 40 CFR 355 as soon as they have knowledge of the discharge.

Immediate Response Actions

Releases triggering a 2 hour or 72 hour notification to the Massachusetts DEP require that an Immediate Response Action (IRA) be performed in accordance with the MCP. IRAs include response actions to assess or clean up the release including activities to contain, isolate, remove or secure a release or threat of release in order to abate, prevent or eliminate an Imminent Hazard and/or respond to other time-critical conditions. At the time of initial notification to DEP, notification of the intention to perform an IRA will be given. IRA's must be performed under the direction of a Licensed Site Professional (LSP).

Discharge of Oil

Title 40 of the Code of Federal Regulations at Part 110, Discharge of Oil, requires that any person in charge of the facility, as soon as he/she has knowledge of a discharge that violates Part 110, Section 110.6, Prohibited Discharge, must "immediately" notify the NRC in Washington, DC. Alternatively, if a direct report to the NRC cannot be made, the report can be made to the NRC through the Coast Guard.

The NRC must still be notified as soon as possible.

A prohibited discharge to the waters of the U.S. or its adjoining shoreline is defined to be a discharge in harmful quantities. Harmful quantities are defined at 40 CFR Part 110 to include discharges that:

- Violates water quality standards; or
- Causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or causes sludge or emulsion to be deposited beneath the surface of the water or upon the adjoining shoreline.

Other External Notifications

Other external notifications can include:

- City of Lowell Fire Department in the event of a spill or release with the potential to impact public safety,
- cleanup contractors to initiate a response IMMEDIATELY,
- a Licensed Site Professional (LSP) who is needed to provide Waste Site Cleanup Opinions in response to response actions taken to assess or abate a release of oil or hazardous materials to the environment and to prepare Bills of Lading to dispose of contaminated soil,
- Local Emergency Planning Committees (LEPC) if the situation has potential to affect neighboring communities, □ the Massachusetts Department of Public Health if the situation threatens the surrounding community.

Massachusetts DEP, Two Hour and Seventy Two Hour Releases

Following the two-hour and seventy-two hour oral notification (described above) of a release, in accordance with the Massachusetts Contingency Plan (310 CMR 40.0000) a Release Notification Form (RNF), providing written notification of releases or threats of releases shall be submitted to the DEP Northeast Regional Office in Boston on the form developed by DEP for that purpose. The RNF shall be submitted within sixty days of knowledge of the release. The RNF is downloadable from <http://www.mass.gov/dep/cleanup/approvals/bwsc-103.pdf>. Included with this submittal will be a written IRA Plan or IRA Completion Report (if the response actions are complete) including a transmittal form stamped by a LSP. A copy of this form is provided as Attachment E.

Written Notification to DEP for Hazardous Waste Incidents

The owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within seven days after the incident, the owner or operator shall submit a written report of the incident to the Department.

The report shall include:

- the name, address, and telephone number of the owner or operator,
- the name, address, and telephone number of the facility,
- the date, time, and type of incident (e.g., fire, explosion),
- the name and quantity of material(s) involved,
- the extent of injuries, if any,
- *an assessment of actual or potential hazards to public health, safety, welfare, or the environment, when this is applicable,*
- the estimated quantity and the disposition of recovered material that resulted from the incident,
- all differences between the emergency response activities actually taken and those prescribed in the contingency plan and the reasons for each such difference, and proposed measures to prevent similar incidents in the future.

3.5 Erosion and Sediment Controls

The entire property area is paved, roofed, vegetated, or otherwise stabilized to minimize the potential for erosion. To ensure that erosion and sedimentation do not occur, Bradford will periodically inspect the site during monthly inspections to note any signs of erosion and/or sediment collection. During the inspections, specific attention will be paid to areas near discharge conveyances along the Concord River. In areas where erosion or exposed soil is evident, corrective measures may include soil replacement and reseeding; the repair of pavement; and the placement of gravel, crushed stone, or pavement in erosion-prone areas.

3.6 Management of Runoff

Stormwater from facility building roofs is primarily directed to a series of downspouts which discharge to a combined sanitary stormwater drainage system at the site. However, select portions of the facility building in areas recently constructed and/or renovated, discharge stormwater to the pavement to the west of the Building. Stormwater flows via sheet flow over the paved parking area and discharges to the soil off the edge of the pavement.

3.7 Salt Storage Piles or Piles Containing Salt

Bradford maintains a small (<5 cubic yard) accumulation of salt for seasonal ice and snow control at its facility immediately adjacent and partially under the main loading dock at the facility. The location of the salt storage is shown in the Attachment B Site Map. Snow and ice removal (plowing) is provided by contract vendors.

Bradford will enclose or cover the seasonal salt material to minimize exposure resulting from adding to or removing materials from the pile. The enclosure will consist of a weather and rain resistant tarp which completely covers the entire pile and directs precipitation away from contact with the salt.

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

Bradford operates under SIC Code 2295 and is subject to the sector-specific requirements for Sector V Subsector V1; SIC Codes 2211-2299; Textile Mill Products. Additional control measures specified for this sector include the following:

Good Housekeeping Measures:

Material Storage Areas. Plainly label and store all containerized materials (e.g., fuels, petroleum products, solvents, and dyes) in a protected area, away from drains. Minimize contamination of the stormwater runoff from such storage areas. Also consider an inventory control plan to prevent excessive purchasing of potentially hazardous substances. For storing empty chemical drums or containers, ensure that the drums and containers are clean (consider triple-rinsing) and that there is no contact of residuals with precipitation or runoff. Collect and dispose of washwater from these cleanings properly.

Material Handling Areas. Minimize contamination of stormwater runoff from material handling operations and areas. Consider the following (or their equivalents): use of spill and overflow protection; covering fueling areas; and covering or enclosing areas where the transfer of material may occur. When applicable, address the replacement or repair of leaking connections, valves, transfer lines, and pipes that may carry chemicals, dyes, or wastewater.

Fueling Areas. Minimize contamination of stormwater runoff from fueling areas. Consider the following (or their equivalents): covering the fueling area, using spill and overflow protection, minimizing run-on of stormwater to the fueling areas, using dry cleanup methods, and treating and/or recycling stormwater runoff collected from the fueling area.

Above-Ground Storage Tank Area. Minimize contamination of the stormwater runoff from aboveground storage tank areas, including the associated piping and valves. Consider the following (or their equivalents): regular cleanup of these areas; including measures for tanks, piping and valves explicitly in your SPCC program; minimizing runoff of stormwater from adjacent areas; restricting access to the area; inserting filters in adjacent catch basins; providing absorbent booms

in unbermed fueling areas; using dry cleanup methods; and permanently sealing drains within critical areas that may discharge to a storm drain.

Spill Prevention and Response Procedures: Bradford maintains a stock of spill response materials at the facility loading dock to respond to any inadvertent spills or leaks of fluid during product delivery and shipping. This material is also used to address any spills and/or leaks from machinery oils that may occur within the facility. Process chemicals and liquid products are stored inside the facility building, outside the influence of precipitation.

3.9 Employee Training

Bradford SWPPP Team personnel will undergo a training program designed to inform stormwater pollution prevention team members of the components and goals of this Stormwater Pollution Prevention Plan. Training will address spill response, good housekeeping and material management practices.

The portion of the training session related to spill prevention and response procedures would accomplish, at a minimum, the following:

- Clearly identify potential spill areas and drainage routes.
- Identify stormwater discharge outfalls.
- Familiarize employees with potential spill scenarios.
- Introduce spill response coordinators and Pollution Prevention Team members and their responsibilities.
- Familiarize personnel with the locations of spill clean-up equipment and the persons responsible for operating such equipment.
- Raise SWPP personnel awareness of the need to recognize unacceptable debris, scum, or other objectionable matter storm discharge.

The portion of the training session dedicated to materials handling and storage will accomplish, at a minimum, the following objectives:

- Heighten employee awareness of which materials are hazardous, where those materials are stored, and proper storage methods.
- Point out container labels. □ Explain recycling practices.
- Discuss proper loading and unloading practices.
- Discuss proper storage location for any bulk debris and temporary material stockpile areas. The portion of the training session dedicated to good housekeeping practices will cover the following information including information required for the Textile Mills, Apparel, and Other Fabric Product manufacturing sector.

- Identify basic clean-up procedures
- Clearly define proper disposal locations
- Familiarize personnel with the locations of routine clean-up equipment
- use of reused and recycled waters,
- solvents management,
- proper disposal of dyes,
- proper disposal of petroleum products and spent lubricants, □ spill prevention and control, and □ fueling procedures.

Employee training will take place at least once per year, or more frequently as required by employee involvement with stormwater management. Training will be conducted under the supervision of the Stormwater Pollution Prevention Plan Team Members and will cover the objectives of this Plan. Particular emphasis will be placed on bulk chemical loading and unloading as well as chemical container receipt and handling. Personnel involved in the handling of regulated materials and other personnel working in the areas covered by this plan should be involved in training. Employee training records will include names and signatures of trainers and personnel date of training, and topics covered. The facility shall maintain training records for five years.

3.10 Non-Stormwater Discharges

See Section 2.3 above.

3.11 Waste, Garbage and Floatable Debris

Waste and garbage at the Facility is managed in trash compactors and covered roll-off containers fitted with water tight lids. Bradford will continue to use and maintain roll-off containers for this purpose and will request change-out of any roll-off containers that are rusty or outfitted with poorly fitting lids such that stormwater passing through the container contents could enter the stormwater drainage system. Roll-off containers associated with the trash compactors are fully covered. On an infrequent basis (several times per year), Bradford may use a roll-off container for the disposal of debris from renovation and/or upgrade projects. This roll-off container is typically on-site for a period of 24-hours or less. Bradford has elected to maintain the short duration of any project-specific roll-off containers to the 24-hour period to minimize the accumulation of trash and/or debris from after-hours disposal or drop-off of debris. Additionally, facility personnel will periodically remove any garbage and floatable debris (especially wind-blown papers and trash) that may enter stormwater drainage from the surrounding environment.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

Dust control at the Facility is addressed through industrial filtration systems to remove particulate matter from significant exhaust streams. Maintenance and proper operation of the commercial air filtration systems achieves control of dust at the facility.

Materials received at the Bradford facility generally include either commercial bulk chemical delivery or packaged commercial products or industrial parts. Vehicle tracking of industrial materials is limited to wintertime sand and/or salt used for ice and snow control.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

1. Sample Location(s).

Bradford personnel will collect a representative sample of stormwater at sampling locations SW-1, SW-2, SW-3, and SW-4 identified on the Attachment B Site Map which represent each of the four drainage basins identified below.

- DA-001 estimated at 131,100 square feet
- DA-002 estimated at 122,000 square feet
- DA-003 estimated at 42,300 square feet
- DA-004 estimated at 65,400 square feet

2. Pollutant Parameters to be Sampled.

As a facility which may discharge stormwater to an impaired water (Concord River) without an EPA approved or established TMDL, the facility must conduct periodic monitoring. Beginning in the first full quarter following April 1, 2009 or your date of discharge authorization, whichever date comes later, you must monitor once per year at each outfall (except substantially identical outfalls) discharging stormwater to impaired waters without an EPA approved or established TMDL. This monitoring requirement does not apply after one year if the pollutant for which the waterbody is impaired is not detected above natural background levels in your stormwater discharge, and you document that this pollutant is not expected to be present above natural background levels in your discharge.

In accordance with the requirements for Subsector V Textile Mills, Apparel, and Other Fabric Products no sector-specific benchmark monitoring is required. However, annual stormwater monitoring is required for stormwater discharges to the Concord River for the following parameters:

- Metals, and □ Nutrients.

Specific metals and nutrients to be monitored would include the following as listed in the December 2008 Final Listing of the Condition of Massachusetts' Waters Pursuant to Sections 303(d) and 305(b) of the Clean Water Act.

- Arsenic
- Cadmium
- Chromium (total)
- Copper
- Lead
- Nickel
- Zinc
- Nitrogen (Total)
- Phosphorus (Total)

In addition, Bradford will initially monitor the outfall in Drainage Area DA-002 for the presence of volatile organic compounds (VOCs) using EPA Method 8260. Analysis for VOCs is recommended due to the use of this class of chemicals in the facility operations and due to the potential for discharge in stormwater runoff. Analysis is recommended for the outfall SW-2 in DA-002 as representative of the other drainage areas at the facility. Outfall SW-2 was selected to be representative due to the presence of the unloading area and the loading docks.

3. Monitoring Schedules.

Monitoring will be conducted once per year. Results will be evaluated following the initial round of sampling and recommendations for further monitoring and/or discontinuation of monitoring will be documented and placed with analytical results in Attachment G.

4. Numeric Limitations.

Numeric limitations are not applicable to Bradford. In addition, no benchmark monitoring concentrations are applicable to the monitoring.

5. Procedures.

Stormwater samples will be collected once per year from a discharge resulting from a storm vent that results in stormwater runoff to SW-1 to SW-4 and that occurs at least 72 hours after the preceding measurable storm event. Run-off events resulting from snow or ice melt cannot be used to meet the annual monitoring requirements. Grab sampling techniques will be used for all monitoring. Collection of grab samples will begin during the first 30 minutes of a storm event discharge and will be completed as soon as possible.

The samplers name, date, rainfall pH, time of the start of the discharge, time of sampling, and magnitude (in inches) of the storm event sampled shall be monitored and recorded on log sheets maintained by the Facility. The date between the storm event sampled and the end of the previous measurable storm event must also be logged.

All pollutant parameters will be determined according to methods prescribed in Title 40, CFR Part 136, promulgated pursuant to Section 304(h) of the Federal Water Pollution Control Act.

Inactive and unstaffed sites exception

The Bradford Facility is staffed during normal business hours. This exemption is not applicable.

Substantially identical outfall exception

As indicated in the Attachment B Site Map, only two of the discharge conveyances "A" and "G" are expected to receive stormwater discharge. Discharge at drainage area DA-002 will be from the edge of the pavement as no discrete stormwater discharge exists within this drainage area.

SECTION 5: INSPECTIONS

Facility personnel are committed to conducting site inspections necessary to identify, prevent, and minimize, impacts to stormwater quality at the plant. Facility personnel who are familiar with the facility operations, the BMPs and this SWPP Plan will inspect areas of the facility where industrial materials or activities are exposed to storm water. Stormwater inspections will only be performed by stormwater pollution prevention team members identified in Section 1.3 of this plan. The 2008 MSGP requires the following three types of stormwater inspections:

- Routine facility inspections (2008 MSGP, Part 4.1);
- Quarterly visual assessment of stormwater discharges (2008 MSGP, Part 4.2); and
- Comprehensive site inspections (2008 MSGP, Part 4.3).

Each type of inspection is described below.

Routine facility inspections are performed at all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the effluent limits contained in this permit. Routine facility inspections are typically conducted at least quarterly (i.e., once each calendar quarter). However, industries in the Textile Mills, Apparel, and Other Fabric Product manufacturing sector require inspections to be conducted at least monthly. Inspections will be conducted while the facility is in operation, with at least one inspection conducted during a period when stormwater discharge is occurring.

Routine facility inspections will be conducted at the following locations:

- Outfalls "A" through "G",
- Bulk chemical fill ports,

- loading docks,
- trash compactors and roll-off containers
- air handling and filtration systems,
- fire pump building, and
- any other potential sources or controls of stormwater pollution identified at the facility for evidence of, or the potential for, pollutants entering the stormwater drainage system.

Quarterly visual assessments of stormwater will be conducted in accordance with Part 4.2 of the 2008 MSGP. Inspections will be conducted at the same locations as the routine facility inspections. During the visual inspection a sample of stormwater will be collected from each of the four outfalls identified in Figure 2 and a visual assessment conducted. The visual assessment must be made:

- Of a sample in a clean, clear glass, or plastic container, and examined in a well-lit area;
- On samples collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and you must document why it was not possible to take samples within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge from your site; and
- For storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if you document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period.

You must visually inspect the sample for the following water quality characteristics:

- Color;
- Odor;
- Clarity;
- Floating solids;
- Settled solids;
- Suspended solids;
- Foam;
- Oil sheen; and
- Other obvious indicators of stormwater pollution.

Documentation of the visual assessment will include:

- Sample location(s)

- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination,
- If applicable, why it was not possible to take samples within the first 30 minutes.

Comprehensive Site Inspections will be performed at the same locations as the routine facility inspections. These inspections will be conducted on an annual basis during each of the following periods:

- Year 1: No completed Notice of Intent (NOI) seeking coverage under EPA's Industrial Multi-Sector General Permit (MSGP)
- Year 2: September 29, 2009 – September 29, 2010
- Year 3: September 29, 2010 – September 29, 2011
- Year 4: September 29, 2011 – September 29, 2012
- Year 5: September 29, 2012 – September 29, 2013

Comprehensive site inspections must be conducted by qualified personnel with at least one member of your stormwater pollution prevention team participating in the comprehensive site inspections. Inspectors must consider the results of the past year's visual and analytical monitoring when planning and conducting inspections. Inspectors must examine the following:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas; and
- Control measures needing replacement, maintenance, or repair.

Inspections cover all storm water systems, structural control equipment as well as the facility in general for effective implementation of the BMPs. The condition (or status) of the following items should be noted in the inspection report:

- Evidence of non-storm water discharges to storm water system;
- Outdoor equipment storage areas;
- Verify no oil products are stored outdoors without secondary containment, this includes drums and totes;

- Loading/unloading areas;
- Drum storage areas;
- Storm drainage system, and outfalls;
- Storm drain inlets;
- Unstabilized soil subject to erosion; and
- Spill response equipment

The evaluations will include visual inspection of the bulk chemical fill ports, roll-off compactor/container areas, transformers, loading docks, air handling and filtration systems, emergency fire pump building/ storage tank, and any other potential sources or controls of stormwater pollution identified at the facility for evidence of, or the potential for, pollutants entering the stormwater drainage system. These areas and stormwater control features may include the following:

- Evidence of non-storm water discharges to storm water system;
- Outdoor equipment storage areas;
- Verify no oil products are stored outdoors without secondary containment, this includes drums and totes;
- Loading/unloading areas;
- Drum storage areas;
- Storm drainage system, and outfalls;
- Storm drain inlets;
- Unstabilized soil subject to erosion; and
- Spill response equipment

Inspections will be conducted, when possible, during rainfall events. The tentative schedule for quarterly visual assessments will be as follows with the first assessment expected on or before April 1, 2010.

Quarter	On or before date
1 st Quarter	January 1
2 nd Quarter	April 1
3 rd Quarter	July 1
4 th Quarter	October 1

The team will use the inspection form included in Attachment F to ensure a complete evaluation. The evaluation must include:

- Inspections for evidence of, or potential for, pollutants entering the storm drainage system;

- Evaluation of the measures and controls that were implemented to reduce pollutant discharges to determine if they are adequate;
- Observation of the installed structural controls to determine if they are performing as needed to achieve the requirements of the General Permit; and
- Evaluation of the facility's overall compliance with the General Permit.

At the completion of each Site Compliance Evaluation, an inspection report will be prepared. The report must be signed by the permittee and may be inserted into Attachment G of this SWPP Plan to assist with recordkeeping. The reports shall be retained for at least five years. Each report must include:

- The date of the inspection;
- The names of the personnel who participated in the inspection;
- Observations made;
- Changes made to the Stormwater Pollution Prevention Plan as a result of the Site Compliance Evaluation; and
- A discussion of non-compliance situations observed and responses taken.

The permittee must amend the SWPP Plan as necessary to address any sources or potential sources of pollution identified as a result of each Site Compliance Evaluation.

SECTION 6: DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

6.1 Documentation Regarding Endangered Species.

No endangered species are known to exist at the Bradford Industries Facility property.

6.2 Documentation Regarding Historic Properties

The facility is located in an industrial area of Lowell, Massachusetts. No known impacts of site stormwater to historic properties have been identified.

6.3 Documentation Regarding NEPA Review

Bradford does not maintain any discharges subject to any New Source Performance Standards (NSPS) identified in Table 1-1 below.

Regulated Discharge	40 CFR Section	MSGP Sector	New Source Performance Standard (NSPS)	New Source Date
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	Part 429, Subpart I	A	Yes	1/26/81
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	Part 418, Subpart A	C	Yes	4/8/74
Runoff from asphalt emulsion facilities	Part 443, Subpart A	D	Yes	7/28/75
Runoff from material storage piles at cement manufacturing facilities	Part 411, Subpart C	E	Yes	2/20/74
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	Part 436, Subparts B, C, and D	J	No	N/A
Runoff from hazardous waste and non-hazardous waste landfills	Part 445, Subparts A and B	K, L	Yes	2/2/00
Runoff from coal storage piles at steam electric generating facilities	Part 423	O	Yes	11/19/82 (10/8/74)

SECTION 7: SWPPP CERTIFICATION

The following certification statement must be signed and dated by a person who meets the requirements of the 2008 MSGP.

- For a corporation: By a responsible corporate officer. For the purpose of this subsection, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which

govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

- For a partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this subsection, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for

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

Name:	John Bernier	Title:	Manufacturing Manager
Signature:		Date:	

Note that this certification must be re-signed in the event of a SWPPP modification described in this SWPPP (see Section 8.0 below).

Name:		Title:	
Signature:		Date:	

SECTION 8: SWPPP MODIFICATIONS

The 2008 MSGP requires revisions to the SWPPP whenever there is a change in design construction, operation or maintenance which has a significant effect on the potential for the discharge of pollutants to surface waters.

The facility will review the SWPPP following each quarterly visual inspection to verify the need for any amendments or updates. If any of the following conditions occur, you must review and revise the selection, design, installation, and implementation of your control measures to ensure that the condition is eliminated and will not be repeated in the future:

1. an unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit) occurs at the facility;
2. a discharge violates a numeric effluent limit;
3. the facility becomes aware, or EPA or the DEP determines, that your control measures are not stringent enough for the discharge to meet applicable water quality standards;
4. an inspection or evaluation of your facility by an EPA official, or local, State, or Tribal entity, determines that modifications to the control measures are necessary to meet the non-numeric effluent limits in this permit; or
5. It is found during routine facility inspections, quarterly visual assessments, or comprehensive site inspections that control measures are not being properly operated and maintained.

The facility will document discovery of any of the conditions listed above within 24 hours of making such discovery. Subsequently, within 14 days of such discovery, the facility will document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. If it is determined that changes are necessary following your review, any modifications to your control measures must be made before the next storm event if possible, or as soon as practicable following that storm event. These time intervals are not grace periods, but are schedules considered reasonable for documenting your findings and for making repairs and improvements. They are included to ensure that the conditions prompting the need for these repairs and improvements are not allowed to persist indefinitely.

If any of the following conditions occur, you must review the selection, design, installation, and implementation of your control measures to determine if modifications are necessary to meet the effluent limits in this permit:

- construction or a change in design, operation, or maintenance at your facility significantly changes the nature of pollutants discharged in stormwater from your facility, or significantly increases the quantity of pollutants discharged; or

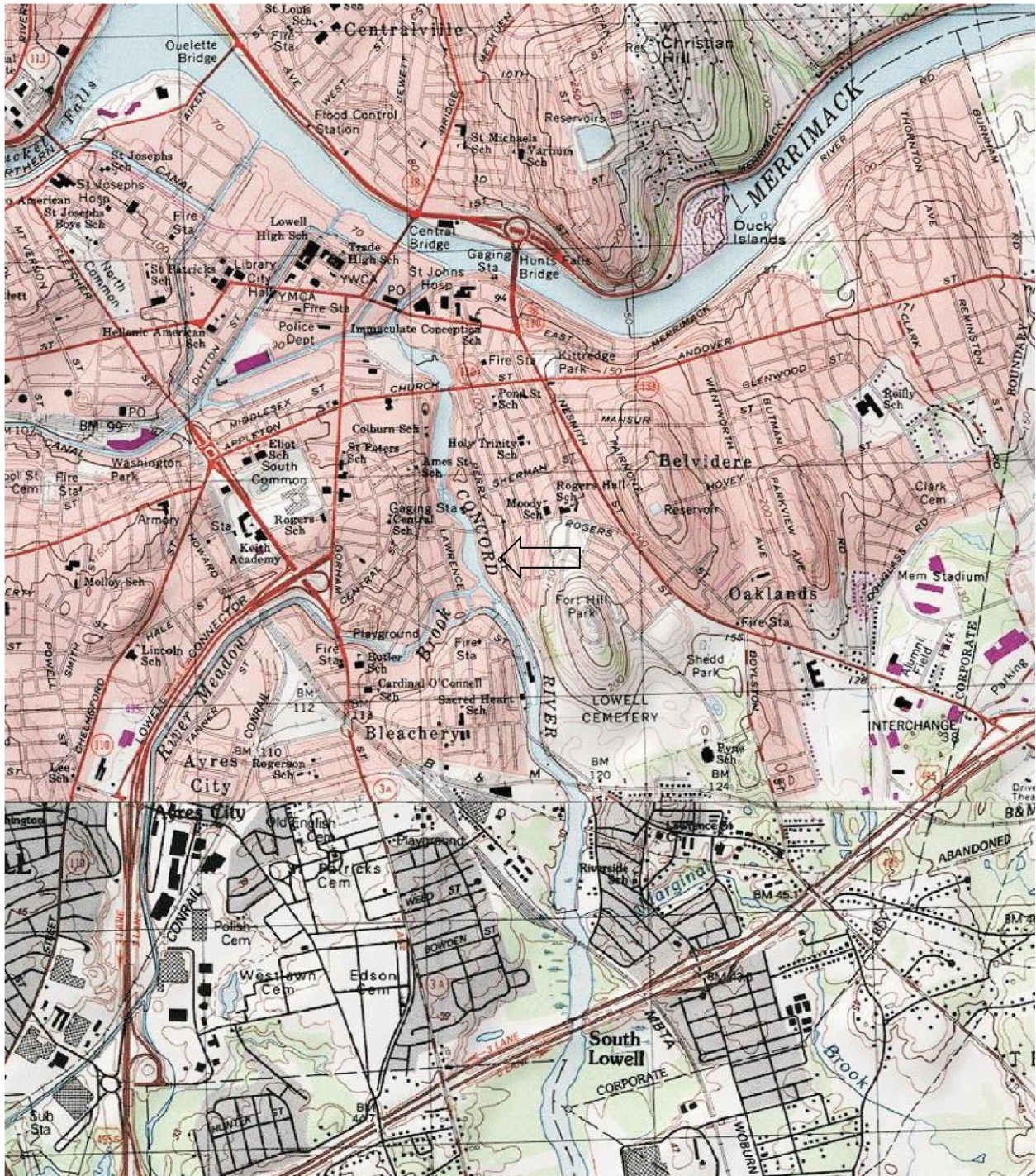
In accordance with Appendix B, Subsection 11.C. of the 2008 MSGP, the following log will be completed and maintained to document any modifications to this SWPPP.

Date	Description of Modification	Name of Person Modifying Plan	Signature
1/15/2017	Company Ownership Change; Employee Title changes	Ivy Muchuma	I.M.
/31/2019	Employee Changes	Stephanie Tuzzolo	S.T.

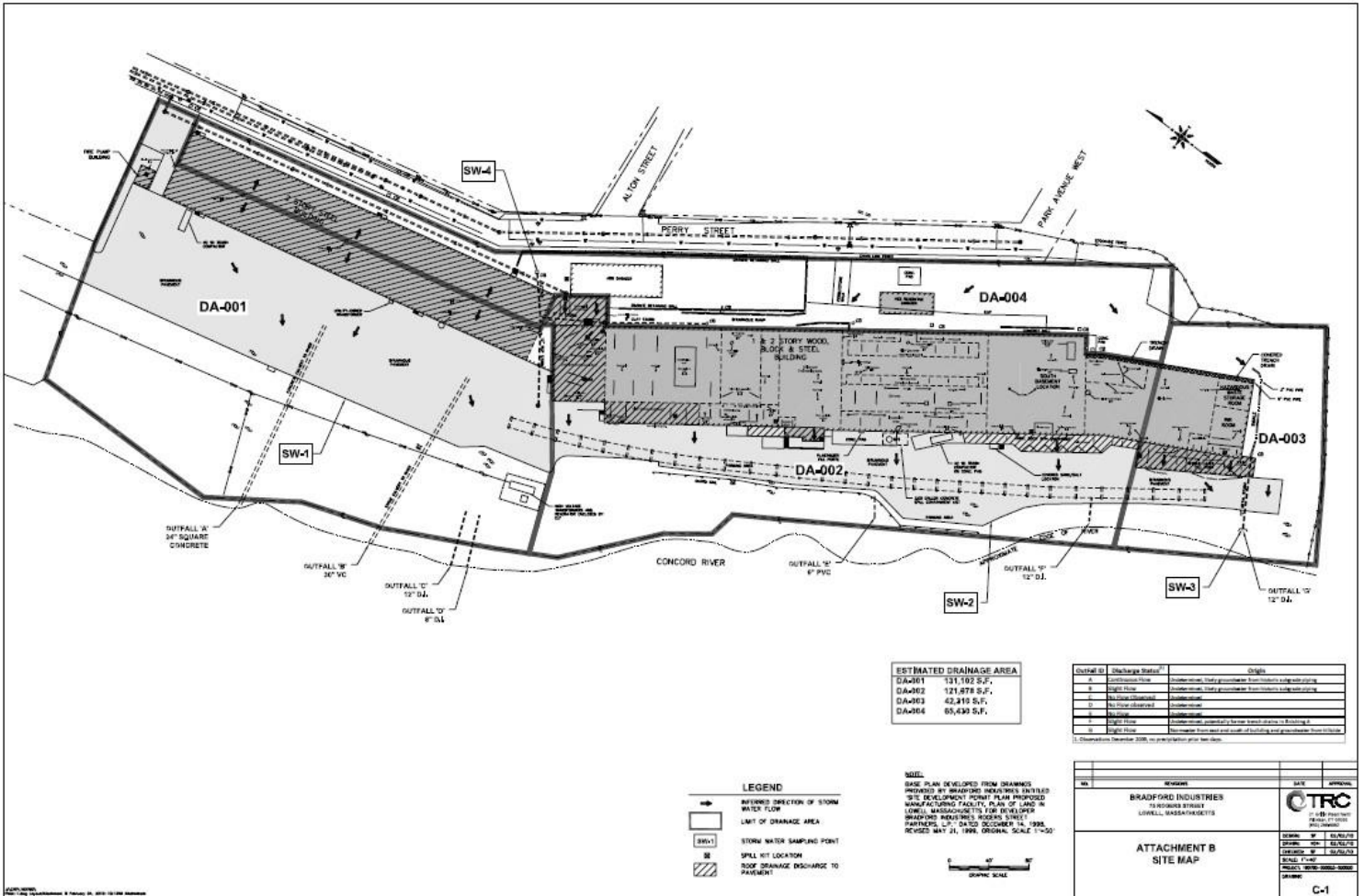
Note that if the SWPPP is modified in response to a corrective action required by Part 3.1 of the 2008 MSGP, then the certification statement in section 7 of this SWPPP template must be re-signed in accordance with 2008 MSGP Appendix B, Subsection 11.A or 11.B.

Site Location Map

Attachment 34



Attachment B Site Map



2008 MSGP

Attachment C
Attachment D
Reportable Quantity (RQ)
List

NAME	CAS/ 313 Category Codes	Section 302 (EHS) TPQ	Section 304 EHS RQ	CERCLA RQ	Section 313	RCRA CODE	CAA 112(r) TQ
2-Nitropropane	79469			10	313	U171	
Acetone	67641			5,000		U002	
Aluminum (fume or dust)	7429905				313		
Ammonia	7664417	500	100	100	313		
Ammonium hydroxide	1336216			1,000	313		
Antimony trioxide	1309644			1,000	313c		
Arsenic	7440382			1	313		
Barium	7440393				313		
Barium Compounds	N040				313		
Benzene	71432			10	313	U019	
Bis(2-ethylhexyl)phthalate	117817			100	X	U028	
Butyl acetate	123864			5,000			
Butyl benzyl phthalate	85687			100			
Cadmium	7440439			10	313		
Cadmium Compounds	N078			***	313		
Chlorobenzene	108907			100	313	U037	
Chromium	7440473			5,000	313		
Chromium Compounds	N090			***	313		
Copper	7440508			5,000	313		
Copper Compounds	N100			***	313		
Cumene	98828			5,000	313	U055	
Decabromodiphenyl oxide	1163195				313		
DEHP	117817			100	X	U028	
Di(2-ethylhexyl) phthalate	117817			100	313	U028	
Diglycidyl ether	2238075	1,000	1,000				
Dimethylformamide	68122			100	X		
Ethene, chloro-	75014			1	X	U043	10,000
Ethyl acetate	141786			5,000		U112	

Ethylene glycol	107211			5,000	313		
Formaldehyde	50000	500	100	100	313	U122	15,000
Formaldehyde (solution)	50000	500	100	100	X	U122	15,000
Furan, tetrahydro-	109999			1,000		U213	
Glycol Ethers	N230			***	313		
Hexamethylene-1,6diisocyanate	822060			100	313#		
iso-Butyl acetate	110190			5,000			
Isobutyl alcohol	78831			5,000		U140	
Isopropyl alcohol (mfg-strong acid process)	67630				313		
Lead	7439921			10	313^		
Lead				10		D008	
Lead Compounds	N420			***	313^		
Methanol	67561			5,000	313	U154	
Methyl ethyl ketone (MEK)	78933			5,000		U159	
Methyl isobutyl ketone	108101			5,000	313	U161	
N,N-Dimethylformamide	68122			100	313		
n-Butyl alcohol	71363			5,000	313	U031	
Nickel Compounds	N495			***	313		
Toluene	108883			1,000	313	U220	
Triethylamine	121448			5,000	313	U404	
Vinyl acetate	108054	1,000	5,000	5,000	313		15,000
Vinyl acetate monomer	108054	1,000	5,000	5,000	X		15,000
Vinyl chloride	75014			1	313	U043	10,000
Xylene (mixed isomers)	1330207			100	313	U239	
Zinc	7440666			1,000			
Zinc Compounds	N982			***	313		
(a) Xylene (CAS No. 1330-20-7, RCRA Waste No. U239)				1,000			
(b) Acetone (CAS No. 67-64-1, RCRA Waste No. U002)				5,000			
(b) Methyl ethyl ketone (CAS No. 78-93-3, RCRA Waste No. U159)				5,000			
(c) Ethyl acetate (CAS No. 14178-6, RCRA Waste No. U112)				5,000			

*** Indicates that no RQ is assigned to this generic or

broad class

Attachment E
Release Notification Form
(RNF)

MSGP Quarterly Visual Assessment Form

(Complete a separate form for each outfall you assess)

Name of Facility:		Permit No.:	
Street Address:		City:	State: Zip Code:
Outfall Number:	"Substantially Identical Outfall"? <input type="checkbox"/> No <input type="checkbox"/> Yes (identify substantially identical outfalls):		
Quarter/Year:	Substitute Sample?: <input type="checkbox"/> No <input type="checkbox"/> Yes (identify quarter/year when sample was originally scheduled to be collected):		
Person(s)/Title(s) collecting sample:			
Person(s)/Title(s) examining sample:			
Date & Time Storm or Snowmelt Began:	Date & Time Sample Collected: _____	Date & Time Sample Examined: _____	
Nature of Discharge: <input type="checkbox"/> Rainfall <input type="checkbox"/> Snowmelt			
Rainfall Amount: _____ inches	Previous Storm Ended > 72 hours Before Start of This Storm? <input type="checkbox"/> Yes <input type="checkbox"/> No* (explain):		
Parameter			
Color	<input type="checkbox"/> None <input type="checkbox"/> Other (describe):		
Odor	<input type="checkbox"/> None <input type="checkbox"/> Musty <input type="checkbox"/> Sewage <input type="checkbox"/> Sulfur <input type="checkbox"/> Sour <input type="checkbox"/> Petroleum/Gas <input type="checkbox"/> Solvents <input type="checkbox"/> Other (describe):		
Clarity	<input type="checkbox"/> Clear <input type="checkbox"/> Slightly Cloudy <input type="checkbox"/> Cloudy <input type="checkbox"/> Opaque <input type="checkbox"/> Other (describe):		
Floating Solids	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe):		
Settled Solids**	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe):		
Suspended Solids	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe):		
Oil Sheen	<input type="checkbox"/> None <input type="checkbox"/> Flecks <input type="checkbox"/> Globs <input type="checkbox"/> Sheen <input type="checkbox"/> Slick <input type="checkbox"/> Other (describe):		
Foam (gently shake sample)	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe):		
Other Obvious Indicators of Storm Water Pollution	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe): _____		

* The 72-hour interval can be waived when the previous storm did not yield a measurable discharge or if you are able to document (attach applicable documentation) that less than a 72-hour interval is representative of local storm events during the sampling period.

** Observe for settled solids after allowing the sample to sit for approximately one-half hour.

Sampling not performed due to adverse conditions: No Yes (explain): _____

Sampling not performed due to no measurable storm event occurring that resulted in a discharge during the monitoring quarter:
 No Yes (explain): _____

Detail any concerns, additional comments, descriptions of pictures taken, and any corrective actions taken below (attach additional sheets as necessary).

Certification by Facility Responsible Official (Refer to MSGP Subpart 11 Appendix B for Signatory Requirements)

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

A. Name _____

B. Title _____

C. Signature _____

D. Date Signed _____

Attachment G
Stormwater Monitoring
Data