MOVE YOUR ENVIRONMENT FORWARD

May 28, 2021

Mr. Peter Angelini
Aaron Industries Corp.
8 & 20 Mohawk Drive
Leominster, Massachusetts 01453

RE: STORMWATER POLLUTION PREVENTION PLAN, AARON INDUSTRIES CORP., LEOMINSTER, MA (HRP # AAR2006.GW)

Dear Mr. Angelini:

Please see the attached Stormwater Pollution Prevention Plan completed for compliance with the June 2021 EPA Multi-Sector General Permit for your facility located at 8 & 20 Mohawk Drive in Leominster, MA.

Please note that the certification in Section 8 of the plan must be signed and dated by the responsible corporate officer of Aaron Industries Corp.

If you have any questions or require additional information, please feel free to contact HRP at (800) 246-9021 or me directly at (860) 682-0275.

Sincerely,

Arek Myszka
Arek Myszka
Project Consultant

Attachments

MOVE YOUR ENVIRONMENT FORWARD

STORMWATER POLLUTION PREVENTION PLAN

AARON INDUSTRIES CORP.
8 & 20 Mohawk Drive
Leominster, Massachusetts 01453

Prepared For:

AARON INDUSTRIES CORP.
Peter Angelini
8 & 20 Mohawk Drive
Leominster, Massachusetts 01453
Telephone Number: (978) 534-6135 x40

Prepared By:

HRP Associates, Inc.
197 Scott Swamp Road
Farmington, CT 06032

HRP #: AAR2006.WM

Issued On: May 28, 2021

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Attachments

General Information

Project/Site Information:
AARON INDUSTRIES CORP.
8 & 20 Mohawk Drive
Leominster, Massachusetts 01453

Consultant Information:
HRP Associates, Inc.
197 Scott Swamp Road
Farmington, CT 06032
Phone: 800-246-9021
E-mail: Arek.myszka@hrpassociates.com
Project Number: AAR2006.GW

Client Information:
AARON INDUSTRIES CORP.
8 & 20 Mohawk Drive
Leominster, Massachusetts 01453

Inspection Date: 5/10/2021

Report Date: 5/28/2021

Report Author: Arek Myszka

Arek Myszka Project Consultant

Qualified Person: Thomas Battles

Thomas Battles, P.E., Engineering Practice Leader

1.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information
Name of Facility: Aaron Industries Corp.
Street: 8 & 20 Mohawk Drive
City: Leominster State: MA ZIP Code: 01453
County or Similar Subdivision: Worcester
NPDES ID (i.e., permit tracking number): NA (if covered under a previous permit)
Primary Industrial Activity SIC code, and Sector and Subsector
(2021 MSGP, Appendix D and Part 8): SIC 3087, Sector Y, Subsector Y2
Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (2021 MSGP, Appendix D): There are no co-located facilities
Is your facility presently inactive and unstaffed and are there no industrial materials or activities exposed to stormwater? ☐ Yes ☒ No

Latitude/Longitude
Latitude: Longitude:
42.5267º N (decimal degrees) -71.7347º W (decimal degrees)

Method for determining latitude/longitude (check one):
☐ USGS topographic map (specify scale:) ☐ GPS
☒ Other (please specify): OLIVER: MassGIS's Online Mapping Tool

Horizontal Reference Datum (check one):
☐ NAD 27 ☒ NAD 83 ☐ WGS 84
Is the facility located in Indian country?
☐ Yes ☒ No
If yes, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if applicable). Not Applicable

Are you considered a "federal operator" of the facility?
Federal Operator – an entity that meets the definition of "operator" in this permit and is either any department, agency or instrumentality of the executive, legislative and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.
☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 6.3 (acres) Includes both properties, 8 & 20 Mohawk combined

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)?
☒ Yes ☐No

If yes, name of MS4 operator: City of Leominster MS4

Name(s) of surface water(s) that receive stormwater from your facility: North Nashua River

Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2021 MSGP, Appendix A)? ☒ Yes ☐ No

If Yes, identify name of the impaired water(s) (and segment(s), if applicable):
North Nashua River (MA81-03)

Identify the pollutant(s) causing the impairment(s): Escherichia coli (E. coli)

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?
E. coli is not anticipated to be present in the stormwater from the site.

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? NO.
If yes, please list the TMDL pollutants:

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water (see definitions in 2021 MSGP, Appendix A)? ☐ Yes ☒ No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2021 MSGP Table 1-1)? ☒ Yes ☒ No

If Yes, which guidelines apply?

1.2 Contact Information/Responsible Parties

Facility Operator(s):

Name: Aaron Industries Corp.
Address: 8 & 20 Mohawk Drive
City, State, Zip Code: Leominster, Massachusetts 01453
Telephone Number: (978) 534-6135 x40
Email address: luisr@Aaroninc.com
Fax number: (978) 537-7360

Facility Owner(s):

Name: TC Realty LLC
Address: 8 Mohawk Drive
City, State, Zip Code: Leominster, MA 01453
Telephone Number: (978) 534-6135
Email address: Not available

Name: AH Realty Trust
Address: 20 Mohawk Drive
City, State, Zip Code: Leominster, MA 01453
Telephone Number: (978) 534-6135
Email address: Not available

SWPPP Contact(s):

SWPPP Contact Name (Primary): Luis Rivera
Telephone Number: (978) 534-6135 x40
Email Address luisr@aaroninc.com
Fax Number: (978) 537-7360

SWPPP Contact Name (Backup): Robert M. Tocci
Telephone Number: (978) 534-6135
Email Address: robertt@aaroninc.com
Fax Number: (978) 537-7360

1.3 Stormwater Pollution Prevention Team

The stormwater pollution prevention team is responsible for overseeing development of the facility's SWPPP, any modifications to it, and for implementing and maintaining control measures, taking corrective action and or additional implementation measure (AIM) responses when required.

Each member of the stormwater pollution prevention team will have ready access to the 2021 MSGP, the most updated copy of the SWPPP, and other relevant documents that must be kept with the SWPPP.

- Identify the staff members (by name and/or title) that comprise the facility's stormwater pollution prevention team as well as their individual responsibilities.
- EPA recommends, but does not require, the stormwater pollution prevention team include at least one individual from each shift to ensure that there is always a stormwater pollution prevention team member on-site.

Staff Names	Individual Responsibilities
Luis Rivera, Plant Manager	Overall responsibility for plan development and implementation; conduct stormwater inspections; maintain record keeping; sampling; and submission of reports.
Bob Oakes, Maintenance Manager	Oversee fixes to equipment as needed to prevent stormwater contamination.
Robert M. Tocci, Vice President	Oversee plan development and implementation; coordination of employee training program; stormwater sampling, record keeping; and submission of reports.

1.4 Site Description

The Aaron Industries Corp. plant is located at 8 & 20 Mohawk Drive, Leominster, Massachusetts. The facility is a supplier of thermoplastic custom compounds and resins. Aaron Industries produces recycled resins through specialty compounding of reprocessed resins, additives and fillers. The facility also produces reinforced resins which include various grades of polypropylene filled with short glass, talc, calcium and other minerals, recycled compounds, and generic off-grade resins. The most common generic resins produced include polypropylene (homopolymer/copolymer), polystyrene (GPPS/HIPS), and polyethylene (HDPE/LDPE). Outfall 001

and Outfall 002 have been switched to Outfall 003 and Outfall 004. The locations of the Outfalls have changed, requiring new surnames with corresponding latitudes/longitudes.

On-site industrial activities potentially exposed to stormwater include:

- Receiving of raw materials to on-site buildings and silos;
- Shipping of produced resin pellets;
- Storage of raw plastic pellet in silos;
- Storage and transfer of raw material and final resin product in truck trailers;
- Storage and transfer of scrap into an on-site dumpster; and
- Storage and transfer of state regulated hazardous waste.

Industrial activities are performed on both 8 & 20 Mohawk Drive, and encompass approximately 60% of the site, with the remaining being parking and undeveloped spaces.

The main building is located at 20 Mohawk Drive and is the location where most of the industrial operations take place. The property includes multiple material silos, a baghouse, material, and waste storage and loading docks. A transformer is located on the west side of the property.

8 Mohawk Drive has ancillary industrial operations and has its own loading dock. The property also includes a wooded area on the southeastern portion of the property. A transformer is located on the north side of the property.

The two combined sites are approximately 9.56 acres, with approximately 50% impervious surfaces. The surrounding area is primarily industrial/commercial with open space and the North Nashua River to the west.

1.5 General Location Map

The general location map for this facility can be found in Attachment A.

1.6 Site Map

The site map for this facility can be found in Attachment B.

The total size of the site and the percent of the site which is impervious:

Total Size of Site: 9.56 Acres (Includes both 8 & 20 Mohawk Drive)
Percent Impervious: Approximately 50%

There is no run-on of stormwater to this site from adjacent properties. Therefore, the quality of the stormwater discharges from the Aaron Industries Corp. facility is not impacted by run-on from surrounding areas.

2.0 POTENTIAL POLLUTANT SOURCES

2.1 Potential Pollutants Associated with Industrial Activity

A list of the potential pollutants or pollutant constituents (e.g., motor oil, fuel, and cleaning solvents) for each industrial activity on-site is listed below. All known significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the three years prior to the date of this SWPPP are also included.

Material	Name	Location	Pollutant	Discharge Point	Activity
Municipal Solid Waste (MSW) and plastic pellet scrap	Municipal Solid Waste Dumpster/ Compactor	Off south side of 20 Mohawk Dr.	TSS	Outfall 003	On-site waste disposal practices, loading and unloading operations
Mineral and other oils	Shipping and Receiving	Off south side of 20 Mohawk Dr	Oil & Grease; TPH	Outfall 003	Loading and unloading operations
Plastic pellets	Silos	Silos south of 20 Mohawk Dr building	TSS	Sheet flow off-site or to Outfall 003	Loading operations
Plastic pellets	Shipping	Off south side of 20 Mohawk Dr	TSS	Outfall 003	Loading finished product
Plastic pellets/resin	Shipping and Receiving	Off north side of 8 Mohawk Dr	TSS	Sheet flow off-site or to Outfall 005	Loading and unloading operations
Waste Oil	Waste oil tote in Maintenance / Shipping and Receiving	Off south side of 20 Mohawk Dr	Oil & Grease; TPH	Outfall 003	On-site waste disposal practices, loading and unloading operations
Oil (Dielectric fluid)	Pad Mounted Transformer	West side of 20 Mohawk Dr.	TPH	Sheet flow off-site or to Outfall 005	Transformer (located outdoors)
Oil (Dielectric fluid)	Pad Mounted Transformer	North side of 8 Mohawk Dr.	TPH	Sheet flow off-site or to Outfall 005	Transformer (located outdoors)

2.2 Spills & Leaks

2.2.1 Areas of Site Where Potential Spills/Leaks Could Occur

Refer to the table in Section 2.1 above for areas on-site where potential spills/leaks could occur and the discharge points to where those spills would flow. The likelihood that a spill/leak would reach one of these discharge points is low.

2.2.2 Description of Past Spills/Leaks

No known spills/leaks of oil or toxic or hazardous substances have occurred at exposed areas, or that drained to a stormwater conveyance, in the three years prior to the date of this SWPPP. If any significant spill or leaks do occur on-site, the following information will be collected and added to this SWPPP in the table below.

Note: Significant spills and leaks include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under CWA Section 311 (see 40 CFR 110.6 and 40 CFR 117.21) or Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC §9602.

Date	Description	Discharge Points
Insert date of spill/leak	*Insert description of spill/leak (where it occurred, what happened, types of pollutants, extent of damage)*	*Specify which discharge point(s) would be affected*

2.3 Unauthorized Non-Stormwater Discharges Documentation

Description of this facility's unauthorized non-stormwater discharge evaluation:

Date of evaluation: May 10, 2021

Description of the evaluation criteria used: A comprehensive visual inspection of all outdoor storage areas was conducted to note any wastewater discharges during a non-stormwater event. The City of Leominster lifted catchbasin and manhole covers to inspect the interiors for debris.

Very little debris was found in in the manhole assigned as Outfall 003 located at the southern end of the site, in the driveway.

During the inspection three pipes were found and noted going into the Outfall 005 catch basin, located in front of the 20 Mohawk Drive. One pipe had a consistent trickle of water coming out of it. Notingthat it had rained the day prior, the Aaron Industry personnel reviewed the drain again after aprolonged dry period. During this follow-up inspection, flow was still observed. The City ofLeominster Department of Public Works has previously noted that groundwater infiltration has been

found in the area storm sewer system. Improvements to the City of Leominster system are planned for the summer of 2021. Uncontaminated groundwater is an authorized non-stormwater discharge. It is recommended that during these improvements the source of the pipe be determined to ensure an unauthorized non-stormwater discharge is not occurring.

List of the drainage points that were directly observed during the evaluation: Outfalls 003, 004, and 005 were observed during the inspections. No flow was noted from any of these outfalls except for the above-mentioned pipe entering Outfall 005.

Under a previous plan revision and associated non-stormwater discharge evaluation, Aaron Industries noted flow from the extruder process. As a result, in 2015, Aaron Industries installed a fabricated stainless steel sump box below their concrete floor to accommodate and recycle the process water from extruder machines on-site. It is now collected, pumped back into the holding tank in the building and recycled back in the process loop. No further industrial discharges have been noted during subsequent inspections. Aaron Industries representative noted that all floor drains had been previously capped.

2.4 Salt Storage

Aaron Industries does not store bulk quantities salt or sand on-site for deicing, commercial uses, or industrial uses.

2.5 Sampling Data Summary

Aaron Industries had no historical sampling data available during the time of this report. Aaron Industries will amend this report if any data is obtained.

3.0 STORMWATER CONTROL MEASURES

3.1 Non-Numeric Technology-based Effluent Limits (BPT/BAT/BCT)

Aaron Industries will institute the following non-numeric effluent limits and best practices as detailed herein.

3.1.1 Minimize Exposure

The following is a description of any structural controls or practices used to minimize the exposure of industrial activities to rain, snow, snowmelt and runoff on-site.

- All deliveries and transfers are overseen by Aaron Industries personnel.
- A spill kit is maintained in the maintenance area.
- Best management practices for material storage are followed, such as storing materials indoors. If necessary, materials stored outdoors will be stored under roof or covered bay or be provided covered containers to minimize contact with stormwater (such as the onsite silos).
- All materials are stored in containers that are compatible with their contents.
- All areas of significant stormwater pollution sources are inspected quarterly.
- Inspection procedures are in place for the cleanout of the silos on-site to reduce contact with stormwater.
- The waste dumpster/compactor is covered and waste can be added from within the building.
- Liners are placed in the catchbasins on site and included in regular inspections.
- Daily visual inspections of the dumpster/compactor and surrounding area are conducted to clean up any debris or plastic pellets that escape the containment.

3.1.2 Good Housekeeping

The following practices are being implemented on-site to keep exposed areas clean:

1. Collect and dispose of all existing waste, debris and trash present on the site on a regular schedule and as needed throughout the facility.

2. Daily visual inspections of the dumpster/compactor and surrounding area are conducted and employees are directed to clean up any debris or plastic pellets that escape the containment

3. Maintain clean surfaces by broom cleaning, sweeping, shoveling, etc. Regularly pick up and dispose of/recycle waste material throughout the facility especially plastic pellets on the ground at and around the waste dumpster and silos.

4. Material inventory practices, such as labeling of all containers throughout the facility.

5. Perform quarterly inspections of onsite tanks to identify leaks or conditions that could lead to the discharge of toxic or hazardous chemicals to the stormwater system.

6. Report spills to the appropriate individuals and familiarize personnel with spill prevention and response procedures.

7. Provide spill response equipment in easily accessible locations near potential spill areas and familiarize personnel with equipment locations and uses. Spill equipment is currently located in the maintenance area.

8. Familiarize plant personnel with the locations of storm drains and catchbasins around the facility.

9. Keep catchbasins grates free of leaves and debris accumulation throughout the facility.

10. Incorporate information sessions on good housekeeping practices into the employee's training program; and discuss good housekeeping practices at employee meetings.

3.1.3 Maintenance

The following describe the procedures used on-site to (1) maintain all control measures in effective operating condition; and (2) maintain industrial equipment and systems in order to minimize pollutant discharges.

- Inspecting and maintaining stormwater management devices regularly;
- Inspection procedures are in place for the cleanout of the silos on-site to minimize contact with stormwater;
- All areas of significant stormwater pollution sources are inspected quarterly;
- Inspecting and testing facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in the discharge of pollutants to surface waters; and
- Ensuring appropriate maintenance of such equipment or systems.

The following elements of the stormwater collection and conveyance system shall be inspected and, if necessary, have excessive debris removed from them on at least a quarterly basis:

- Stormwater catchbasins will be maintained by the City of Leominster as they are located within the right of way/and or roadway.
- Dry wells located on 20 Mohawk Drive will be inspected at least quarterly and cleaned out as needed.
- Catchbasin liners are switched out 4-6 times per year on an as needed basis based on inspections.
- Aaron Industries calls the City of Leominster Department of Public Works to have the catchbasins cleaned out with a vac truck when changing the liner.

Equipment and systems which could fail and result in discharges of pollutants to stormwater shall be properly maintained and be inspected or observed on a quarterly basis and during normal site rounds or in the course of routine operations. Formal inspections will include a written log of observations made. In areas where observations are made and areas needing cleaning or maintenance will be reported and acted upon in a timely manner.

Quarterly Inspections will also be conducted of the following equipment and will be recorded on the forms included in Attachment D:

- Material storage areas included the mineral oil totes, raw plastic pellet silo and other storage, transformers, and associated secondary containment,
- Loading and unloading areas,
- Used oil accumulation and storage areas, and
- Spill response equipment/supplies (i.e. absorbent materials, spill mats for catchbasins, etc.) to maintain an adequate supply.

Inspection Guidelines:

The previously listed Good Housekeeping and Preventative Maintenance inspections shall be recorded. Inspection records shall be retained for five years. Any location which does not meet inspection criteria or appears to be a potential problem will be reported to the Pollution Prevention Team Leader. Personnel will immediately take all reasonable steps to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented, including cleaning up any contaminated surfaces so that the material will not be discharged during subsequent storm events. Final repairs/replacement of stormwater controls will be completed as soon as feasible but must be no later than within 14 days or, if that is infeasible, within 45 days. If the completion of stormwater control repairs/replacement will exceed the 45 day timeframe, the facility may take the minimum additional time necessary to complete the maintenance, provided that the facility notifies the EPA Regional Office of its intention to exceed 45 days, and document in this SWPPP the rationale for the modified maintenance timeframe. If a control measure was never installed, was installed incorrectly or not in accordance with the general permit, or is not being properly operated or maintained, the facility must conduct corrective action as specified in Part 4 of MSGP.

Note: In this context, the term "immediately" requires you to, on the same day you identify that a control measure needs to be maintained, take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. However, if a problem is identified at a time in the work day when it is too late to take action, the initiation of action must begin no later than the following work day. "All reasonable steps" means that the permittee has undertaken initial actions to assess and address the condition causing the corrective action, including, for example, cleaning up any exposed materials that may be discharged in a storm event (e.g., through sweeping, vacuuming) or making arrangements (i.e., scheduling) for a new best management practice (BMP) to be installed at a later date. "All reasonable steps" for purposes of complying with Part 4.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Necessary, when you conclude a corrective action is, in fact, not necessary, could include documenting why a corrective action is unnecessary.

3.1.4 Spill Prevention and Response Procedures

Spill prevention and response measures are used to minimize the amount of material lost due to spills and also to minimize the residue from spills. For spills which occur in areas exposed to stormwater, this also serves to minimize the pollution of stormwater.

Areas where potential spills can contribute to pollutants to stormwater discharges and their accompanying drainage points are identified on the site plan included in Attachment B.

Aaron Industries will ensure:

- Containers of oil and all hazardous products are plainly labeled in accordance with OSHA requirements to encourage proper handling and facilitate rapid response if spills or leaks occur,
- Plant personnel are familiar with the locations of storm drains and catchbasins around the facility,
- Best practices for material inventories, such as labeling of all containers throughout the facility are followed,
- All deliveries and transfers are overseen by Aaron Industries personnel,
- Aaron Industries employees are trained on procedures to quickly stop, contain and clean up incidental leaks, spills, and other releases,
- Spill kits are located in the Maintenance Area, and all other areas on-site where hazardous materials are stored so that if a spill occurs a rapid response can be made, and
- Appropriate facility personnel are notified when a leak, spill or other release occurs.

Good housekeeping and preventative maintenance practices are used to prevent spills. These practices are described in the above in Section 3.1.1 - 3.1.3. Other spill prevention and response measures that must be followed include:

- Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur,
- Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas,
- Develop training and train all staff on procedures to quickly stop, contain and clean up leaks, spills, and other releases. Staff should be trained to, as appropriate, execute such procedures as soon as possible,
- Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made; and
- Notify appropriate facility personnel when a leak, spill or other release occurs.

Where a leak, spill or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302, occurs during a 24-hour period, the facility must notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as facility personnel have knowledge of the discharge. Contact information must be in locations that are readily accessible and available.

Spill containment and cleanup procedures:

- Dry Material Spills: Spill area to be thoroughly cleaned using brooms, industrial vacuums, or other similar equipment. Material resulting from cleanup to be properly disposed of or recycles as appropriate.

- Liquid Spills: Spill area to be contained using adsorbent booms, if necessary to prevent spill from spreading or reaching stormwater conveyance systems. Spill area to be thoroughly cleaned using adsorbents, mops, industrial vacuums, or other similar equipment. Material resulting from cleanup (including adsorbents) to be properly disposed.
- If spilled material presents a safety concern, proper safety equipment to be used, including gloves, respirators, safety glasses, and protective clothing and boots.
- The spill shall be documented accordingly in the table included in Section 2.2.2 and a record of spill documentation shall be kept in a Spills File within the main facility at 20 Mohawk Drive.

Federal and State spill reporting obligations are included in Section 4.3.

In the event of a spill, an evaluation of the SWPPP must be conducted to determine if the spill could have been prevented, and to ensure similar spills do not occur in the future. If revisions to procedures within the SWPPP are warranted, then the plan will be amended as necessary.

3.1.5 Erosion and Sediment Controls

The following describes the activities and processes for stabilizing exposed soils to minimize erosion on-site.

- If necessary, grass or other vegetation is planted on ground exposed by construction or other activities.
- To reduce erosion, every effort will be made to minimize land disturbance and preserve existing vegetation. If land disturbance is unavoidable, and soil erosion is expected, devices such as straw bales, sod, straw and seed, or silt fencing will be used to minimize transport of eroded soil.
- Curbing will be maintained and repaired as necessary to direct stormwater to the on-site catchbasins and drywells.

Due to the layout and topography of the site, erosion due to stormwater is a minimal concern.

3.1.6 Management of Stormwater

Due to the grading and nature of the site layout at 8 & 20 Mohawk Drive, all stormwater runoff associated with industrial activity would be captured by Outfall 003 and Outfall 005. Outfall 004 captures runoff that is primarily associated with the parking area on 8 Mohawk Drive, rather than any industrial activities. The catchbasins in the street on Lock Drive and Mohawk Drive discharge into the City of Leominster Municipal Separate Storm Sewer System (MS4). The MS4 drains directly into the North Nashua River, located west of the site.

The majority of the roof drains send stormwater to the ground where it is directed to the stormwater system or runs off site as sheet flow. Stormwater that flows onto the grassy area on the northern side of the manufacturing building would infiltrate into the ground and remain on-site.

Stormwater runoff associated with industrial activities on 20 Mohawk Drive, including the baghouse filters, loading areas and truck and trailer parking is generally directed to Outfall 003, located at the

southern end of the site. This stormwater is directed to the MS4 system on Lock Drive where it ultimately flows westward to the North Nashua River.

Stormwater which comes in contact with the silos on 20 Mohawk Drive is contained within the asphalt bermed area. This berm serves to prevent material on the surrounding ground from entering the stormwater system. Additionally, runoff is directed to the two drywells located in this area, where stormwater is held and either infiltrated to ground.

Stormwater runoff associated with industrial activity at the loading docks at 8 Mohawk Drive has potential to flow to Outfall 003 on Mohawk Drive via sheet flow. Stormwater from Outfall 005 discharges to the North Nashua River. Outfall 004 on the east side of 8 Mohawk Drive is in a parking lot and is not in an area of industrial activity. Stormwater from Outfall 004 discharges to the wooded area south of the site.

3.1.7 Salt Storage Piles or Piles Containing Salt

Aaron Industries does not maintain any salt or sand containing storage piles on-site.

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials

No dust generating activities are noted onsite. If dust generating activities are introduced to the site (construction, etc.) adequate inspection, maintenance, and good housekeeping practices will be incorporated to minimize the potential for contamination of any stormwater from the facility. No vehicle tracking is required for the vehicles on site. If any material is spilled during loading and unloading it will be promptly cleaned up before vehicle departure. Vehicles stay on pavement the entire time while on site. Good housekeeping procedures are used when trucks get loaded and unloaded.

3.2 Sector-Specific Non-Numeric Effluent Limits

Aaron Industries will comply with the following sector-specific non-numeric effluent limits for Sector Y, Subsector Y2.

Minimize the discharge of plastic resin pellets in stormwater discharges through implementation of controls measures such as the following (as deemed feasible):

- Minimizing spills;
- Cleaning up of spills promptly and thoroughly;
- Sweeping thoroughly and other good housekeeping procedures;
- Pellet capturing;
- Employee training; and
- Disposal precautions

3.3 Numeric Effluent Limitations Based on Effluent Limitations Guidelines (ELGs)

Aaron Industries Corp. is not in an industrial category subject to one of the effluent limitations guidelines identified in the table below (Table 2-1 of the 2021 MSGP).

Regulated Activity	40 CFR Part/Subpart	Effluent Limit
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	Part 429, Subpart I	See Part 8.A.8
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	See Part 8.C.5
Runoff from asphalt emulsion facilities	Part 443, Subpart A	See Part 8.D.5
Runoff from material storage piles at cement manufacturing facilities	Part 411, Subpart C	See Part 8.E.6
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	Part 436, Subparts B, C, or D	See Part 8.J.10
Runoff from hazardous waste landfills	Part 445, Subpart A	See Part 8.K.7
Runoff from non-hazardous waste landfills	Part 445, Subpart B	See Part 8.L.11
Runoff from coal storage piles at steam electric generating facilities	Part 423	See Part 8.O.8
Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	Part 449	See Part 8.S.9

3.4 Water Quality-based Effluent Limitations and Water Quality Standards

The following describes the measures that will be implemented on-site to control industrial stormwater discharge as necessary to meet applicable water quality standards of all applicable states, tribes, and U.S. territories.

EPA expects that compliance with the conditions in this permit will control discharges as necessary to meet applicable water quality standards. If at any time the facility becomes aware, or EPA determines, that any discharge does not meet applicable water quality standards, the facility must take corrective action(s) as required in Part 5.1 of the 2021 MSGP and document the corrective actions as required in Part 5.3 of the 2021 MSGP. The facility must also comply with any additional requirements required by MassDEP.

EPA may also require that the facility undertake additional control measures (to meet the narrative water quality-based effluent limit above) on a site-specific basis or require the facility to obtain coverage under an individual permit, if information in the NOI, required reports, or from other sources indicates that facility discharges are not controlled as necessary to meet applicable water quality standards. The facility must implement all measures necessary to be consistent with an available waste load allocation in an EPA-established or approved TMDL.

A facility is considered to discharge to an impaired water if the first water of the U.S. to which it discharges is identified by a state, tribe or EPA as not meeting an applicable water quality standard, and:

- Requires development of a TMDL (pursuant to section 303(d) of the CWA);
- Is addressed by an EPA-approved or established TMDL; or
- Is not in either of the above categories but the waterbody is covered by a pollution control program that meets the requirements of 40 CFR 130.7(b)(1).

Note: For discharges that enter a separate storm sewer system prior to discharge, the first water of the U.S. to which it discharges is the waterbody that receives the water from the storm sewer system.

Outfall 003 and Outfall 005 discharge to the Leominster MS4. The MS4, in this area, discharges to the North Nashua River to the west. The North Nashua River (MA81-03) is designated in 314 CMR 4.06 Basin Classification as a Class B waterway with warm water and Combined Sewer Outfall (CSO) qualifiers. This segment of the North Nashua River is listed on the Massachusetts Year 2016 Integrated List of Waters under Category 5, "Waters requiring a TMDL." The river's impairment cause is Escherichia coli (E. coli). No EPA TMDL number has been established for this river's pollutants.

The following are existing structural and non-structural measures to reduce pollutants in stormwater discharges.

- Absorbent material is stored on site and accessible for use in control and containment of incidental spills.
- Routine inspection of outdoor storage and clean up as needed.
- Routine visual inspection of the silos to note any visible signs of structural defects such as rust or corrosion.
- Outdoor areas of the facility is cleaned using a street sweeper biannually and as needed.
- Minimal use of ice-melting salt.

- Sanitary and process wastewater is directed to the local sanitary sewer system.

Based on these control measures and the operations on-site, it is not anticipated that the stormwater discharge from Aaron Industries will lower the water quality of the North Nashua River. As noted in Section 4.7 of this plan, however, impaired water monitoring is required annually from Outfall 003 and Outfall 005.

4.0 SCHEDULES AND PROCEDURES

SWPPP IMPLEMENTATION SCHEDULE Aaron Industries Corp. 8 & 20 Mohawk Drive Leominster, MA	
Task/Item	**Schedule Date of Implementation**
Indicator Monitoring – Sampling for pH, TSS and COD at Outfalls 003 and 005	Quarterly basis for entirety of permit coverage beginning July 1, 2021 - January – March - April – June - July – September - October - December
Impaired Waters Monitoring – Sampling for E. coli at Outfalls 003 and 005	Requires sampling for E-Coli annually in the first year of permit coverage and again in the fourth year of permit coverage, unless E. coli is detected in the discharge. Sampling must begin July 1st, 2021 for first year.
Visual Monitoring – Inspecting for water quality characteristics including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other indicators	Quarterly basis for entirety of permit coverage beginning July 1, 2021 - January – March - April – June - July – September - October - December
Employee Training	Within first 3 months of hire and annual refresher training for all applicable employees.

4.1 Good Housekeeping

Aaron Industries personnel will perform quarterly inspections of onsite tanks, dumpsters, and waste storage containers to identify leaks or conditions that could lead to the discharge of toxic or hazardous chemicals to the stormwater system.

Weekly inspections of all waste storage areas are also conducted to determine when pickup and disposal of waste materials (i.e. dumpsters, compactors, hazardous waste storage containers) should occur.

Routine visual inspections of the storage silos are conducted for signs of structural defects including rust or corrosion.

4.2 Maintenance

Stormwater catchbasins are maintained and cleaned out by the City of Leominster due to the location within the right of way/roadway and off Aaron Industries property. Catchbasin liners are also replaced several times a year.

The outdoor pavement areas of the facility are swept biannually and more frequently if needed. Quarterly Inspections will be conducted of the following:

- Transformers,
- Loading and unloading areas,
- Used oil accumulation, outside storage areas, and waste storage areas.

Daily inspections of the silos and dumpster areas will be completed to ensure that any pellets that may have been released to the ground have been captured and swept, as needed.

4.3 Spill Prevention and Response Procedures

The members of the facility Spill Management Team are listed below.

Emergency Response Coordinator:
Name: Luis Rivera
Title: Plant Manager
Telephone No.: (978) 855-0381

Alternate:
Name: Robert M. Tocci
Title: Vice President
Telephone No.: (978) 534-6135

SPILL AND/OR RELEASE FLOW CHART

CONTACT EMERGENCY COORDINATOR AND/OR ALTERNATE EMERGENCY COORDINATOR: 24-hour phone
1) Emergency Coordinator – Luis Rivera (978)696-1926
2) Alternate Emergency Coordinator – Robert M. Tocci (978)534-6135

EMERGENCY COORDINATOR OR ALTERNATE EC OBTAINS THE FOLLOWING INFORMATION:
1) What Spilled 2) Location of Spill
3) Size and Extent of Spill 4) Whether Any Personnel are injured or other hazardous situations

PERSONNEL INJURED?

YES

EMERGENCY COORDINATOR OR ALTERNATE EC CONTACTS THE FOLLOWING:
AMBULANCE: 911
BE PREPARED TO GIVE: NAME, ADDRESS, EXTENT OF INJURIES, EXTENT OF EMERGENCY, POSSIBLE CHEMICALS INVOLVED AND QUANTITY.

NO

THE EMERGENCY COORDINATOR OR ALTERNATE EC WILL NOTIFY THE PROPERTY MANAGEMENT COMPANY OF THE SPILL. IF NECESSARY, THE EMERGENCY COORDINATOR WILL ACTIVATE INTERNAL FACILITY ALARMS AND/OR COMMUNICATIONS SYSTEMS TO NOTIFY ALL PERSONNEL OF EVACUATION

IS THE SPILL AN INCIDENTAL RELEASE THAT CAN BE ABSORBED, NEUTRALIZED, OR OTHERWISE CONTROLLED AT THE TIME OF RELEASE BY EMPLOYEES IN THE IMMEDIATE RELEASE AREA OR BY MAINTENANCE PERSONNEL UTILIZING EQUIPMENT ON-HAND WITHOUT JEOPARDIZING THEIR HEALTH OR SAFETY (APPROXIMATELY 1 LITER OR LESS)?

YES

BEGIN CONTAINING SPILL, CLEAN-UP SPILLED MATERIAL, AND STORE PROPERLY FOR DISPOSAL.

NO

EMERGENCY COORDINATOR OR ALTERNATE CONTACTS SPILL CONTRACTOR: Clean Harbors 800-645-8265

HAS SPILL REACHED OR THREATENED NORTH NASHUA RIVER OR HAS ENTERED THE SOIL, WATER OR VOLITILIZED TO THE AIR?

YES

EMERGENCY COORDINATOR OR ALTERNATE EC IMMEDIATELY CONTACT AGENCIES LISTED IN SECTION 4.3 OF SWPPP AS APPROPRIATE

NO

SPILL CONTAMINATED MATERIAL CLEANED-UP AND STORED PROPERLY FOR DISPOSAL

REPORTING REQUIREMENTS MET (SECTION 4.3)

In the event of any spill of hazardous materials employees are instructed to contact their supervisor who will in turn contact the Emergency Coordinator or alternate emergency coordinator.

Upon being notified, the Emergency Coordinator will obtain the following information:

1. Location of spill;
2. Size and Extent of spill;
3. Hazardous materials involved (if any); and
4. Injury to personnel.

The Emergency Coordinator will then use his professional judgment and experience to determine the action that will be taken, in accordance with the Emergency and Control Procedures. The phone number of the plant to be used by persons outside the facility (e.g. fire, police, spill contractors, etc.) is (978) 534-6135.

It should be noted that Aaron Industries personnel will not assist in handling hazardous materials spills, except minor spills which present no risk to plant personnel and can be cleaned up easily using absorbent materials. For all other spills of hazardous substances, the Emergency Coordinator will contact Clean Harbors, a contracted emergency clean-up firm at 800-645-8265.

After a spill occurs, an evaluation of the SWPPP must be conducted to determine if the spill could have been prevented, and to ensure similar spills do not occur in the future. If revisions to procedures within the SWPPP are warranted, then the plan will be amended.

If a Massachusetts Oil/Hazardous Material (OHM) is released, the Commonwealth requires:

1. Immediate containment of the spill shall be initiated such as blocking of adjacent drains, constructing dikes, etc., using all available containment materials on-hand.

2. Contact the Emergency Coordinator.

3. Contained materials shall be removed as soon as possible and placed into proper containers. All equipment and manpower shall be utilized to remove spilled materials promptly and in a safe manner.

4. In the event that the spill is beyond the means of available manpower and materials on-hand, the Emergency Coordinator will contact the nearest available clean-up contractor.

   Aaron Industries contracted clean-up firm is Clean Harbors, 800-645-8265.

5. Releases in quantities equal to or greater than the Massachusetts Reportable Quantity (RQ) of any OHMs stored on-site (the RQ value for petroleum based oils is 10 gallons and mineral oil is 25 gallons); the RQ value for petroleum products is 10 gallons); or a release that causes a sheen on a surface water; or poses an imminent hazard shall be reported to the Massachusetts Department of Environmental Protection (DEP) within two (2) hours of the actual or threaten release:

Massachusetts DEP, Boston - Phone: (888) 304-1133

Discharge Reporting

At the time the discharge is reported, the following information must be provided to the MADEP (Telephone 888-304-1133):

- Exact address or location and phone number of the facility;
- The date and time of the discharge;
- Type of material discharged;
- Estimated total quantity discharged;
- The source of the spill;
- Description of all affected media;
- Cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove and mitigate the effects of the discharge,
- Whether any evacuation may be needed; and
- Names of individuals/organizations who have been contacted.

After a spill or release above the reportable quantity for a hazardous material listed in 310 CMR 40.1600, the Emergency Coordinator must make a written notification of the event on a Release Notification Form within sixty (60) days to the following agency:

State of Massachusetts
Department of Environmental Protection
Bureau of Waste Site Clean-Up
627 Main St.,
Worcester, MA 01608

In the event that a spill of material of any amount threatens to reach navigable waters, the National Response Center in Boston, MA shall be contacted.

National Response Center (NRC) (800) 424-8802

The Emergency Coordinator should be ready to report the following information to the NRC:

- Your name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Location of the incident;
- Source and cause of the release or spill;
- Types of material(s) released or spilled;
- Quantity of materials released or spilled;
- Danger or threat posed by the release or spill;
- Number and types of injuries (if any);
- Weather conditions at the incident location; and
- Any other information that may help emergency personnel respond to the incident.

Navigable waters of United States are defined in 40 CFR Part 110.1 to include interstate waterways or intrastate waterways including lakes, rivers and streams which may be utilized by interstate

travelers for recreational purposes. Navigable waters also include lakes, rivers and streams from which fish or shellfish are taken. The complete definition may be found in Section 502(7) of the Federal Water Pollution Control Act. In the event of a large volume release, oil products could potentially enter the wetland or municipal storm sewer system.

4.4 Erosion and Sediment Control

No polymers and/or chemical treatments are used for erosion and sediment control on-site.

4.5 Employee Training

At Aaron Industries, all employees who may cause, detect, or respond to a spill or leak shall receive training within their first three months of employment and refresher training annually. At a minimum, the following personnel must receive training:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become pollutants discharged via stormwater;
- Personnel who are responsible for conducting and documenting monitoring and inspections as required in Parts 3 and 4 of the MSGP; and
- Personnel who are responsible for taking and documenting corrective actions as required in 2021 MSGP Part 5.

Specific employees/departments that may be involved in the training include maintenance, production, shipping and receiving personnel.

Training topics include the following:

- Spill Response:
  - Review past spill events, including how they happened and ways to avoid similar spills.
  - For applicable employees, review and demonstration of basic clean-up procedures, including notification of proper personnel.
  - Review locations of spill clean-up equipment and materials.
- Good Housekeeping Practices:
  - Review locations where good housekeeping practices are necessary.
  - Review and demonstration of basic clean-up procedures.
  - Review locations of routine clean-up equipment.
- Maintenance Requirements & Procedures
- Material Management Practices:
  - Review which materials are hazardous and the locations of these materials.
  - Review proper labeling of various materials.
  - Review proper handling practices for various materials.
- Unloading/Loading Practices (select maintenance and shipping/receiving personnel):
  - Review proper unloading/loading practices.
  - Review proper handling practices for various materials.
- Outdoor Storage Areas

  - Review proper storage techniques (i.e. cover materials, store material under covered areas).
  - Review proper removal methods and time periods.
- Waste Management Practices
  - Review proper waste disposal methods.
- Improper Connections to the Storm Sewer (no known on site)

Training will consist of periodic meetings to briefly review the above topics and review recent spill or stormwater issues. More comprehensive training sessions will be held annually in conjunction with the Emergency Action Plan training, which includes topics referenced in this SWPPP. Training documentation is maintained in on-site EHS files.

4.6 Inspections and Assessments

The following sections describe the procedures for performing the required types of inspections for this permit:

4.6.1 Routine Facility Inspections

Routine facility inspections are conducted quarterly by qualified personnel ("persons with the knowledge and skills to assess conditions and activities that could impact stormwater quality, and who can also evaluate the effectiveness of control measures") with at least one member of the stormwater pollution prevention team. These quarterly inspections will be recorded on the form found in Attachment D of this plan.

The findings of the facility inspections will be documented and maintained with the SWPPP. The routine facility inspection report does not need to be submitted to EPA, unless specifically requested to do so. However, the findings must be summarized in the annual report per Part 7.4 of the MSGP. Document all findings, including but not limited to, the following information:

- The inspection date and time;
- The name(s) and signature(s) of the inspector(s);
- Weather information;
- All observations relating to the implementation of control measures at the facility, including:
  - A description of any discharges occurring at the time of the inspection;
  - Any previously unidentified discharges from and/or pollutants at the site;
  - Any evidence of, or the potential for, pollutants entering the drainage system;
  - Observations regarding the physical condition of and around all outfalls, including any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water;
  - Any control measures needing maintenance, repairs, or replacement;
- Any additional control measures needed to comply with the permit requirements;
- Any incidents of noncompliance; and
- A statement, signed and certified in accordance with Appendix B, Subsection 11 of the MSGP (i.e. by responsible official of company).

Any corrective action required as a result of a routine facility inspection must be performed consistent with Part 4 of general permit.

For routine facility inspections to be performed on-site:

1. Person(s) or positions of person(s) responsible for inspection.

   Luis Rivera, Plant Manager
   Bob Oakes, Maintenance Manager
   Robert M. Tocci, Vice President

Note: Inspections must be performed by qualified personnel with at least one member of your stormwater pollution prevention team participating. Inspectors must consider the results of visual and analytical monitoring (if any) for the past year when planning and conducting inspections. Qualified personnel are those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility, and who can also evaluate the effectiveness of control measures.

2. Schedules for conducting inspections.

Routine facility inspections are conducted quarterly. At least once per year, the routine facility inspection must be conducted during a period when a stormwater discharge is actively occurring.

Note: Inspections must be conducted at least quarterly (i.e., once each calendar quarter), or in some instances more frequently (e.g., monthly), as appropriate. Increased frequency may be appropriate for some types of equipment, processes and stormwater control measures, or areas of the facility with significant activities and materials exposed to stormwater. At least one of your routine inspections must be conducted during a period when a stormwater discharge is occurring.

3. Areas where industrial materials or activities are exposed to stormwater.

All areas of industrial activity that are exposed to stormwater are listed in Attachment D in the inspection checklist form and in Section 1.4 and 1.6 of this SWPPP.

4. Areas identified in the SWPPP that are potential pollutant sources (see Part 6.2.3 of the MSGP). See section 2.1 of this plan.

5. Areas where spills and leaks have occurred in the past 3 years.

According to Aaron Industries personnel, no reportable spills have occurred in the past 3 years.

6. Inspection information for discharge points. Each discharge point is depicted on the site plan located in Attachment B.

Outfall ID	Latitude	Longitude
003	42.5256	-71.7352
004	42.5274	-71.7337
005	42.5270	-71.7361

7. Control measures used to comply with the effluent limits contained in this permit.

No numeric effluent limits apply to this site.

8. Other site-specific inspection objectives.

Aaron Industries will conduct routine inspections to look for spilled pellets outside near the loading docks, trash/compactor and silos so that they can be cleaned up promptly and thoroughly.

4.6.2 Quarterly Visual Assessment of Stormwater Discharges

Once each quarter for the entire permit term, the facility must collect a stormwater sample from each outfall and conduct a visual assessment of each of these samples. These samples must be collected in such a manner that the samples are representative of the stormwater discharge.

The visual assessment must be made:

- Of a discharge sample contained in a clean, colorless glass or plastic container, and examined in a well-lit area;
- Of 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 it must be documented why it was not possible to take the sample within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge from the site; and
- For storm events, on discharges that occur at least 72 hours (three days) from the previous discharge. The 72-hour (three-day) storm interval does not apply if it is documented that less than a 72-hour (three-day) interval is representative for local storm events during the sampling period.

The facility must visually inspect or observe the sample for the following water quality characteristics:

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

Whenever the visual assessment shows evidence of stormwater pollution, the facility must initiate the corrective action procedures.

For quarterly visual assessments to be performed at your site, the SWPPP must include a description of the following:

1. Person(s) or positions of person(s) responsible for assessments include:

   Luis Rivera, Plant Manager
   Bob Oakes, Maintenance Manager
   Robert M. Tocci, Vice President

2. Schedules for conducting assessments.

Quarterly visual monitoring samples must be taken once per quarter from Outfalls 003 and 005 for the entire duration of this permit. The samples should be collected in such a manner that samples are representative of the stormwater discharge.

3. Specific assessment activities.

The samples for the quarterly visual monitoring will be obtained from the following locations with the first event occurring between July 1 – September 30, 2021:

- Outfall 003: Manhole located on Lock Drive near the rear driveway
- Outfall 005: Catch basin located on 20 Mohawk Drive next to employee parking lot

Outfall 004 discharges stormwater in a location where no industrial activity occurs. This outfall will not be sampled.
All Visual Assessments will be documented on the forms in Attachment D.

4.6.3 Exception to Routine Facility Inspections and Quarterly Visual Assessments for Inactive and Unstaffed Sites

Not Applicable.

4.7 Monitoring

The following describes the procedures for conducting the applicable types of analytical monitoring specified by the 2021 MSGP:

Check the following monitoring activities applicable to this facility:

☐Benchmark monitoring
☒Indicator monitoring
☐Effluent limitations guidelines monitoring
☐State- or tribal-specific monitoring
☒Impaired waters monitoring
☐Other monitoring required by EPA

4.7.1 Indicator monitoring

1. Sample locations: Outfall 003 is the manhole near Lock Drive near the rear driveway. Outfall 005 Catch basin located on 20 Mohawk Drive next to employee parking lot.

2. Pollutants to be sampled: pH, TSS and COD sampled from both Outfall 003 and Outfall 005 quarterly
3. Monitoring Schedules: Quarterly
4. Numeric limitations: No numeric limitations are applicable
5. Procedures: The Plant Manager and/or his designee will be responsible for taking the stormwater sample from Outfall 003 and Outfall 005 shown on the map. Assistance with the removal of the manhole cover and someone to monitor traffic in this area will be needed.

Facility personnel should be sure to collect only the stormwater discharging from the facility. Do not enter underground locations to collect samples. Use a pole with a sampling container attached at the end or a rope and clean bucket to collect the sample.

Collected samples will be taken to a Massachusetts certified laboratory for analysis of pH, TSS and COD.

All required monitoring must be performed on a storm event that results in an actual discharge from the site ("measurable storm event") that follows the preceding measurable storm event by at least 72 hours (three days). The 72-hour (3-day) storm interval does not apply if facility personnel are able to document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period. In the case of snowmelt, the monitoring must be performed at a time when a measurable discharge occurs on-site.

For each monitoring event, except snowmelt monitoring, the facility must identify the date and duration (in hours) of the rainfall event, rainfall total (in inches) for that rainfall event, and time (in days) since the previous measurable storm event. For snowmelt monitoring, the facility must identify the date of the sampling event.

Facility personnel must take a minimum of one grab sample from a discharge resulting from a measurable storm event. Samples must be collected within the first 30 minutes of a discharge associated with a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample must be collected as soon as practicable after the first 30 minutes and documentation must be kept with the SWPPP explaining 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.

4.7.2 Impaired waters monitoring

1. Sample locations: Outfall 003 is the manhole near Lock Drive near the rear driveway. Outfall 005 Catch basin located on 20 Mohawk Drive next to employee parking lot.
2. Pollutant to be sampled: E. coli sampled from both Outfall 003 and Outfall 005 once per year.
3. Monitoring Schedule: Sampling for E. coli annually in the first year of permit coverage and again in the fourth year of permit coverage, unless the E. coli is detected in the discharge, or is outside the acceptable range, in which case annual monitoring must continue.
4. Numeric Limitations: No numeric limitations are applicable.

5. Procedures: The Plant Manager and/or his designee will be responsible for taking the stormwater sample from Outfall 003 and Outfall 005. Assistance with the removal of the manhole cover and someone to monitor traffic in this area will be needed.

Facility personnel should be sure to collect only the stormwater discharging from the facility. Do not enter underground locations to collect samples. Use a pole with a sampling container attached at the end or a rope and clean bucket to collect the sample.

Collected samples will be taken to a Massachusetts certified laboratory for analysis of E. coli.

All required monitoring must be performed on a storm event that results in an actual discharge from the site ("measurable storm event") that follows the preceding measurable storm event by at least 72 hours (three days). The 72-hour (3-day) storm interval does not apply if facility personnel are able to document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period. In the case of snowmelt, the monitoring must be performed at a time when a measurable discharge occurs on-site.

For each monitoring event, except snowmelt monitoring, the facility must identify the date and duration (in hours) of the rainfall event, rainfall total (in inches) for that rainfall event, and time (in days) since the previous measurable storm event. For snowmelt monitoring, the facility must identify the date of the sampling event.

Facility personnel must take a minimum of one grab sample from a discharge resulting from a measurable storm event. Samples must be collected within the first 30 minutes of a discharge associated with a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample must be collected as soon as practicable after the first 30 minutes and documentation must be kept with the SWPPP explaining 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.

4.7.3 Discontinuing Monitoring

If the pollutant of concern is not detected and not expected to be present in the discharge, or it is detected but the facility has determined that its presence is caused solely by natural background sources, the facility may discontinue monitoring for that pollutant. To support a determination that the pollutant's presence is caused solely by natural background sources, the facility must document and maintain the SWPPP:

- An explanation of why the facility believes that the presence of the pollutant of concern in the discharge is not related to the activities or materials at the facility; and
- Data and/or studies that tie the presence of the pollutant of concern in the discharge to natural background sources in the watershed.

Natural background pollutants include those that occur naturally as a result of native soils, and vegetation, wildlife, or ground water. Natural background pollutants do not include legacy pollutants from earlier activity on-site, or pollutants in run-on from neighboring sources that are not naturally occurring. However, the facility may be eligible to discontinue annual monitoring for pollutants that

occur solely from these sources and should consult the appropriate EPA Regional Office for related guidance.

4.7.4 Monitoring Reports

Monitoring data must be reported using EPA's electronic NetDMR tool at https://cdxnodengn.epa.gov/net-netdmr/ no later than 30 days after receiving complete laboratory results for all monitoring outfalls for the reporting period. Monitoring requirements (i.e., parameters required to be monitored and sample frequency) will be prepopulated on the electronic Discharge Monitoring Report (DMR) form based on the information reported on the facility's NOI form (through the NDPES eReporting tool (NeT)). Accordingly, the following changes to the facility's monitoring frequency must be reported to EPA through the submittal of a "Change NOI" form in NeT, which will trigger changes to the monitoring requirements in NetDMR:

- All benchmark monitoring requirements have been fulfilled for the permit term;
- All impaired waters monitoring requirements have been fulfilled for the permit term;
- Benchmark and/or impaired monitoring requirements no longer apply because the facility is inactive and unstaffed;
- Benchmark and/or impaired monitoring requirements now apply because the facility has changed from inactive and unstaffed to active and staffed;
- A numeric effluent limitation guideline has been exceeded;
- A numeric effluent limitation guideline exceedance is back in compliance.

Once monitoring requirements have been completely fulfilled, the facility is no longer required to report monitoring results using NetDMR. If the facility has only partially fulfilled its benchmark monitoring and/or impaired waters monitoring requirements (e.g., some, but not all, impairment pollutants), the facility must continue to use NetDMR to report sampling results, but the facility must report a "no data" or "NODI" code for any monitoring parameters that have been fulfilled.

5.0 DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

5.1 Documentation Regarding Endangered Species Act (ESA) Listed Species and Critical Habitat Protection

According to a review of the National Marine Fisheries Service (NMFS) mapping no listed species or critical habitats are in the facility's action area. However, according to the U.S. Fish and Wildlife Service (FWS) on-line mapping tool IPaC (the Information, Planning, and Consultation System), the Northern long-eared Bat is a threatened species that may occur on-site. Aaron Industries is not proposing any activities on-site that should affect these threatened species.

A copy of the IPAC report and Criterion C Eligibility Form are included as Attachment E.

5.2 Documentation Regarding National Historic Preservation Act (NHPA)-Protected Properties

Aaron Industries does not anticipate constructing or installing any new stormwater control measures and as such, has met eligibility Criterion A of the MSGP.

6.0 CORRECTIVE ACTIONS

6.1 Conditions Requiring SWPPP Review and Revision

When any of the following conditions occur or are detected during an inspection, monitoring or other means, or EPA or the operator of the MS4 through which the facility discharges informs the facility that any of the following conditions have occurred, the facility must review and revise, as appropriate, this SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of your control measures) so that the general permit's effluent limits are met and pollutant discharges are minimized:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the U.S.) occurs at the facility.
- Control measures in place are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.
- A required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained.
- Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

6.2 Immediate Actions

If corrective action is needed, the facility must immediately take all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.

Note: In this context, the term "immediately" requires facility personnel to, on the same day a condition requiring corrective action is found, take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action, the initiation of corrective action must begin no later than the following work day. "All reasonable steps" means that the permittee has undertaken initial actions to assess and address the condition causing the corrective action, including, for example, cleaning up any exposed materials that may be discharged in a storm event (e.g., through sweeping, vacuuming) or making arrangements (i.e., scheduling) for a new BMP to be installed at a later date.

6.3 Subsequent Actions

If facility personnel determine that additional actions are necessary beyond those implemented, the facility must complete the corrective actions (e.g., install a new or modified control and make it operational, complete the repair) before the next storm event if possible, and within 14 calendar days from the time of discovery of the corrective action condition. If it is infeasible to complete the corrective action within 14 calendar days, the facility must document why it is infeasible to complete the corrective action within the 14-day timeframe. The facility must also identify the schedule for completing the work, which must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. If the completion of corrective action will exceed the 45-day

timeframe, the facility may take the minimum additional time necessary to complete the corrective action, provided that facility personnel notify the EPA Regional Office of the facility's intention to exceed 45 days, the rationale for an extension, and a completion date, which the facility must also include in corrective action documentation (see Part 5 of 2021 MSGP). Where corrective actions result in changes to any of the controls or procedures documented in this SWPPP, the facility must modify this SWPPP accordingly within 14 calendar days of completing corrective action work.

These time intervals are not grace periods, but are schedules considered reasonable for documenting any findings and for making repairs and improvements. They are included in the MSGP to ensure that the conditions prompting the need for these repairs and improvements do not persist indefinitely.

6.4 Corrective Action Documentation

The facility must document the existence of any of the conditions listed in Section 6.1 within 24 hours of becoming aware of such condition. The facility is not required to submit the corrective action documentation to EPA, unless specifically requested to do so. However, facility personnel must summarize the findings in the annual report. Include the following information in the facility's documentation:

- Description of the condition triggering the need for corrective action review. For any spills or leaks, include the following information: a description of the incident including material, date/time, amount, location, and reason for spill, and any leaks, spills or other releases that resulted in discharges of pollutants to waters of U.S., through stormwater or otherwise;
- Date the condition was identified;
- Description of immediate actions taken pursuant to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date/time clean-up completed, notifications made, and staff involved. Also include any measures taken to prevent the reoccurrence of such releases; and
- A statement, signed and certified by a responsible official.

The facility must also document the corrective actions taken or to be taken as a result of the conditions listed in Section 6.1 of this SWPPP within 14 days from the time of discovery of any of those conditions. Provide the dates when each corrective action was initiated and completed (or is expected to be completed). If applicable, document why it is infeasible to complete the necessary installations or repairs within the 14-day timeframe and document the schedule for installing the controls and making them operational as soon as practicable after the 14-day timeframe. If the facility notifies EPA regarding an extension of the 45 day timeframe, the facility must document the rationale for an extension.

CORRECTIVE ACTION REPORT
Aaron Industries Corp.
Leominster, MA

Date:_____ Time:_____ CA Tracking Number:_____

Name/Title:_____

COMPLETE WITHIN 24-HOURS OF DISCOVERY

Condition Requiring Review:

☐ Unauthorized release or discharge
☐ Discharge violates effluent limit
☐ Control measures require modification
☐ Control measures not properly operated /maintained
☐ Failed benchmark sampling
☐ Control measures inadequate
☐ Routine inspection issue
☐ Facility changes

Describe problem identified:

Date problem identified:

COMPLETE WITHIN 14-DAYS OF DISCOVERY

Summary of Corrective Action(s):

Date initiated: Date completed:

Summary of any necessary modifications to SWPPP:

Date Completed:

Date Corrective Action Closed: Closed by:

7.0 RECORDKEEPING AND REPORTING

7.1 Recordkeeping

The following information will be retained for a period of three years after the coverage of this permit expires (March 1, 2024):

- A copy of the SWPPP (including all modifications)
- A copy of the NOI and data used to complete the NOI and all correspondence with the EPA
- A copy of the acknowledgment receive from the EPA assigning the facility's NPDES ID;
- A copy of the MSGP (an electronic copy easily available to SWPPP personnel is also acceptable);
- Documentation of maintenance and repairs of control measures, including the date(s) of regular maintenance, date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure(s) returned to full function, and the justification for any extended maintenance/repair schedules (see Part 2.1.2.3 of the MSGP);
- All inspection reports, including the Routine Facility Inspection Reports (see Part 3.1 of the MSGP) and Quarterly Visual Assessment Reports (see Part 3.2 of the MSGP);
- Description of any deviations from the schedule for visual assessments and/or monitoring, and the reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first 30 minutes of a measurable storm event) (see Part 3.2.3 of the MSGP);
- Description of any corrective action taken at the facility, including triggering event and dates when problems were discovered.
- If applicable, documentation to support any determination that pollutants of concern are not expected to be present above natural background levels if you discharge directly to impaired waters, and that such pollutants were not detected in your discharge or were solely attributable to natural background sources;
- All reports, certifications, and monitoring data.

Activity/Report Type	Frequency
Visual Assessment	Quarterly
Routine Inspections	Quarterly
Impaired Waters Monitoring And Discharge Monitoring Report	Annually
Annual Report	Annually
Corrective Actions	As Needed

** Copies of all reports and monitoring data must be maintained with the SWPPP for at least three years after coverage under the permit terminates (March 1, 2024).*

7.2 Reporting

The following reports must be documented and retained on-site and submitted to either US-EPA, or where applicable, MassDEP:

Reports Submitted to US-EPA		
Report Type	**Frequency**	**Submission Deadline**
Annual Reporting	Annually	Must submit Annual Reporting electronically via NeT by **January 30th** of each year
Monitoring Data	Annually	Must submit the results of impaired water monitoring to EPA via netDMR within 30-days of receiving the results.
Noncompliance that may endanger health or the environment	As Needed	Must notify EPA and the MS4, as applicable, within 24 hrs of the event and submit a follow up report within 5 days
Reportable Quantity Spills	As Needed	Must notify as soon as possible

You must submit all Notice of Intents, Notice of Terminations, NOEs, Annual Reports, Discharge Monitoring Reports (DMRs), and other reporting information as appropriate electronically.

Information required to be submitted to EPA via the electronic NPDES eReporting tool (NeT). NeT:

- Notice of Intent (NOI);
- No Exposure Certification (NOE);
- Notice of Termination (NOT); and
- Annual Report.

To access NeT, go to https://cdxnodengn.epa.gov/netmsgp/action/login

7.2.1 Monitoring Data

All monitoring data (i.e. impaired water sampling results) collected must be submitted to EPA using EPA's NetDMR system (available at https://cdxnodengn.epa.gov/net-msgp/action/login) no later than 30 days after you have received your complete laboratory results for all monitoring outfalls for the reporting period.

7.2.2 Annual Report

The facility must submit an Annual Report to EPA electronically by **January 30th** for each year of permit coverage containing information generated from the past calendar year. The following information must be included:

- A summary of the past year's routine facility inspection documentation required.
- A summary of your past year's quarterly visual assessment documentation;
- A summary of the past year's corrective action documentation. If corrective action is not yet completed at the time of submission of your annual report, the facility must describe the status of any outstanding corrective action(s). Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that the facility is in compliance with the permit.

The Annual Report must also include a statement, signed and certified by a responsible corporate official of Aaron Industries.

8.0 SWPPP CERTIFICATION

The following certification statement must be signed and dated by a person who meets the requirements of Appendix B, Subsection11.A of the 2021 MSGP.

Note: this certification must be re-signed in the event of a SWPPP modification in response to a Part 5.1 trigger for corrective action or a Part 5.2 AIM triggering event.

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: Luis Rivera

Title: Plant Manager

Signature:

Date 5-26-21

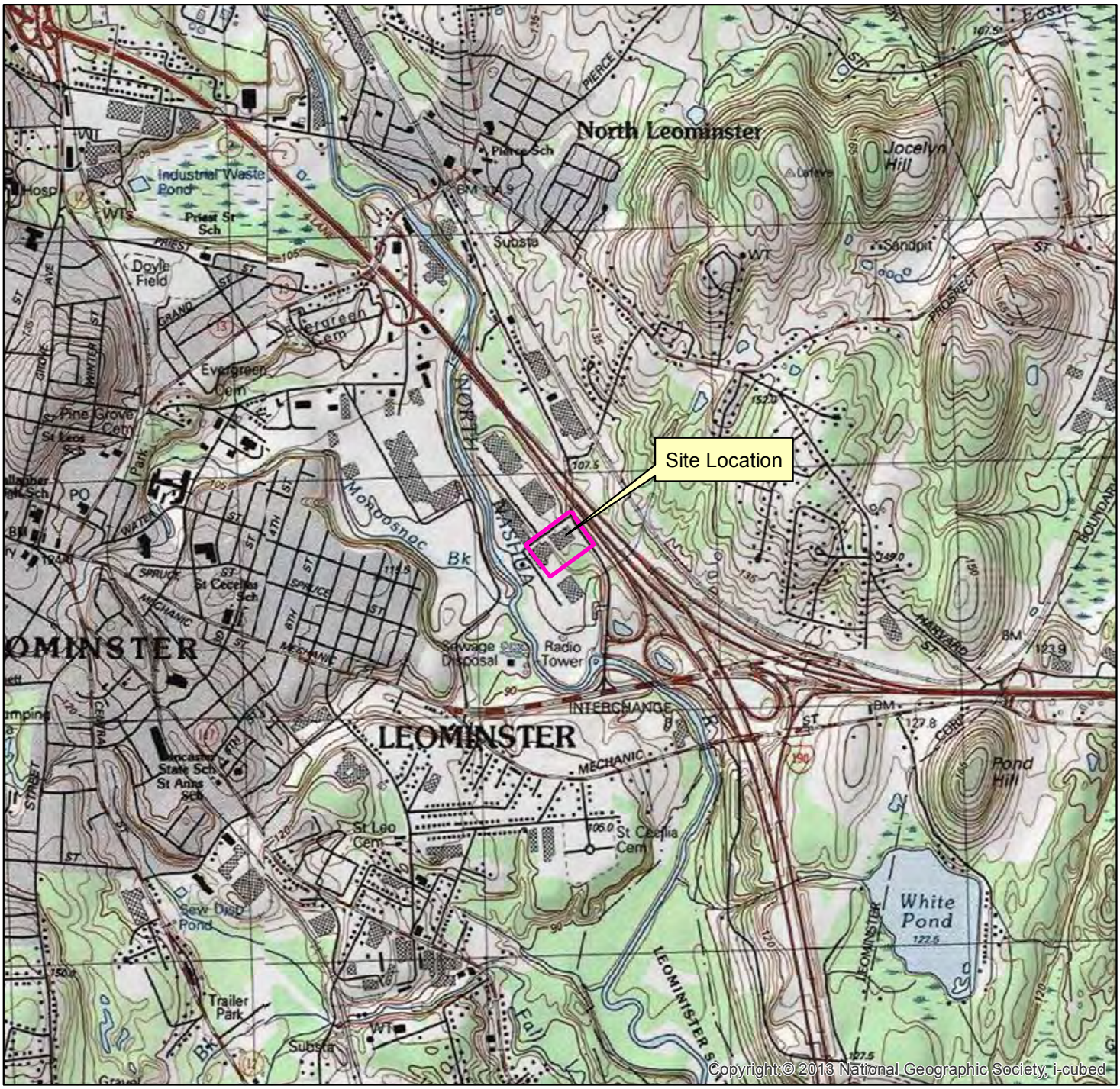
9.0 SWPPP MODIFICATIONS

This SWPPP is a "living" document and is required to be modified and updated, as necessary, in response to corrective actions. See Part 5 of the 2021 MSGP.

- If the facility needs to modify the SWPPP in response to a corrective action required by Part 5.1 or AIM required by Part 5.2 of the 2021 MSGP, then the certification statement in section 7 of this SWPPP must be re-signed in accordance with 2021 MSGP Appendix B, Subsection 11.A.
- Note SWPPP Amendments in the table below.

SWPPP Amendments				
Review Date	**Recertification Required (Yes/No)**	**Description of Revision**	**Signature**	**Date of Amendment**

Attachment A
General Location Map



0 1,000 2,000 4,000 6,000 8,000 Feet

1 inch = 2,000 feet

N

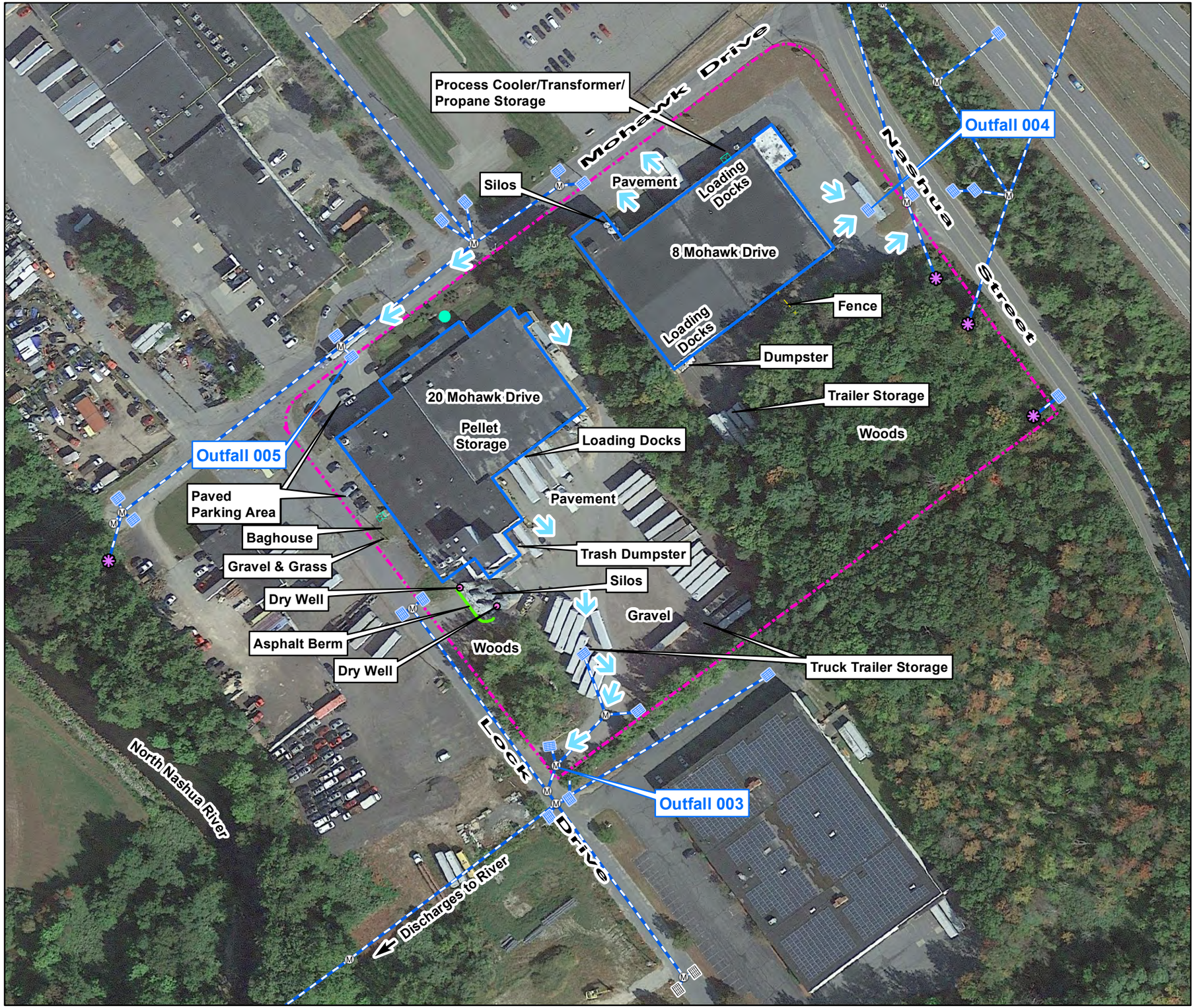
USGS Quadrangle Information
Quad ID: 42071-E6
Name: Shirley, Massachusetts
Date Pub: 1981

Figure 1
Site Location
Aaron Industries
8 & 20 Mohawk Drive
Leominster, MA
HRP# AAR2006.GW
Scale 1" = 2,000'

HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

Path: J:\A\AARIN - AARON INDUSTRIES\20 MOHAWK DRIVE, LEOMINSTER, MA\AAR2006GW\GIS\Figure 1 - Site Location.mxd

Attachment B
Site Map



Legend

- Drain
- Outfall
- Storm Manhole
- Catch Basin
- Transformer
- Stormwater Piping
- Stormwater Direction Arrow
- Approximate Property Boundary

Approximate Area:
9.595578 Acres

HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

North

0 60 120 Feet

Revisions	
No.	Date

Designed By: AM	Drawn By: BOB	Reviewed By: RWS
Issue Date: 05/27/2021	Project No: AAR2006.GW	Sheet Size: 11x17

Site Plan

Aaron Industries
8 & 20 Mohawk Drive
Leominster, MA

FIGURE NO.
2

Path: J:\AAARIN - AARON INDUSTRIES\20 MOHAWK DRIVE, LEOMINSTER, MA\AAR2006GW\GIS\Figure 2 - Site Plan.mxd

Attachment C

2021 MSGP

https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_permit_parts_1-7.pdf

Attachment D
Inspection Checklist/Logs

Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Aaron Industries Corp.		
NPDES Tracking No.			
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications	See Section 1.3 of SWPPP		

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the lastinspection? ❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time ofinspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the site map with you during your inspections. Thislist will ensure that you are inspecting all required control measures at your facility.*
- *Identify if maintenance or corrective action is needed.*
  - *If maintenance is needed, fill out a maintenance record form*
  - *If corrective action is needed, fill out a corrective actions form*

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance or Corrective Action Needed and Notes
1	Catch basin liner at rear entrance driveway	❑ Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Catch basin liner in catch basin west of silo storage on Lock Drive	❑ Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Asphalt berm around silo storage	❑ Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	Loading dock seals Drywell in silo area	❑ Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
5	Drywell in silo area	❑ Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities Exposed to Stormwater

Below are some areas that should be assessed during routine inspections. Identify if maintenance or corrective action is needed. If maintenance is needed, fill out maintenance records form. If corrective action is needed, fill out corrective actions form.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective and operating)?	Maintenance or Corrective Action Needed and Notes
1	**Material loading/unloading and storage areas**	❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
2	**Equipment operations and maintenance areas**	❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
3	**Waste handling and disposal areas (including dumpster/compactor)**	❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
4	**Non-stormwater/ illicit connections**	❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
5	**Silo storage**	❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
6	**Non-stormwater/ illicit connections**	❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
7	**Areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water**	❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
8		❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
9		❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	
10		❑ Yes ❑ No ❑ N/A	❑ Yes ❑ No	

Discharge Points

At discharge points, describe any evidence of, or the potential for, pollutants entering the drainage system. Also describe observations regarding the physical condition of and around all outfalls, including any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water. Identify if any corrective action is needed.

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"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."

Print name and title: _____

Signature:_____**Date:**_____

MSGP Quarterly Visual Assessment Form

(Complete a separate form for each outfall you assess)

Name of Facility: Aaron Industries Corp

NPDES Tracking No.

Outfall Name:

"Substantially Identical Discharge Point"? ☐ Yes ☐ No

Person(s)/Title(s) collecting sample:

Person(s)/Title(s) examining sample:

Date & Time Discharge Began: Date & Time Sample Collected: Date & Time Sample Examined:

Substitute Sample? ☐ No ☐ Yes (identify quarter/year when sample was originally scheduled to be collected):

Nature of Discharge: ☐ Rainfall ☐ Snowmelt

If rainfall: Rainfall Amount (inches): Previous Storm Ended > 72 hours Before Start of This Storm? ☐ Yes ☐ No* (explain):

Pollutants Observed

Color ☐ None ☐ Other (describe): _____

Odor ☐ None ☐ Musty ☐ Sewage ☐ Sulfur ☐ Sour ☐ Petroleum/Gas ☐ Solvents ☐ Other (describe): _____

Clarity ☐ Clear ☐ Slightly Cloudy ☐ Cloudy ☐ Opaque ☐ Other

Floating Solids ☐ No ☐ Yes (describe): _____

Settled Solids** ☐ No ☐ Yes (describe): _____

Suspended Solids ☐ No ☐ Yes (describe): _____

Foam (gently shake sample) ☐ No ☐ Yes (describe): _____

Oil Sheen ☐ None ☐ Flecks ☐ Globs ☐ Sheen ☐ Slick ☐ Other (describe): _____

Other Obvious Indicators of Stormwater Pollution ☐ No ☐ 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.

Identify probably sources of any observed stormwater contamination. Also, include any additional comments, descriptions of pictures taken, and any corrective actions necessary below (attach additional sheets as necessary).

Certification Statement (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:

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Maintenance Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Maintenance Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Date of Maintenance Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Date of Maintenance Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Date of Maintenance Action:

Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Date of Maintenance Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Corrective Action Documentation

Instructions:

Within 24 hours of becoming aware of a condition identified in Parts 5.1 or 5.2 of the 2021 MSGP, document the existence of the condition and subsequent actions. Note that this information must be summarized in the annual report (as required in Part 7.5 of the 2021 MSGP).

Description of Condition:
For Spills and Leaks:
Description of Incident:
Material:
Date/Time:
Amount:
Location:
Reason for Spill:
Discharge to Waters of U.S.:
Date:
Immediate Actions:
Actions Taken within 14 Days:
14 Day Infeasibility:

45 Day Extension:

Description of Condition:
For Spills and Leaks:
Description of Incident:
Material:
Date/Time:
Amount:
Location:
Reason for Spill:
Discharge to Waters of U.S.:
Date:
Immediate Actions:
Actions Taken within 14 Days:
14 Day Infeasibility:

45 Day Extension:

Attachment E

IPAC and Criterion C Forms/Data

NPDES FORM 6100-059	EPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 **Endangered Species Protection - Criterion C3 Eligibility Form**	OMB No. 2040-0300 Exp. Date: 3/31/2024

Instructions:

In order to be eligible for coverage under Criterion C3, **you must complete the Endangered Species Protection section of the Notice of Intent in the NPDES eReporting Tool (NeT-MSGP)**. Per Part 7.1, you must submit your NOI electronically via NeT-MSGP, unless the EPA Regional Office grants you a waiver from electronic reporting, in which case you may use this paper Criterion C3 form. If using the paper form, you must complete the following form and you must submit it to EPA following the instructions in Section VII **a minimum of 30 days prior to filing your NOI for permit coverage**. After you submit your form, you may be contacted by EPA with additional measures (e.g., additional stormwater controls or modifications to your discharge- related activities) that you must implement in order to ensure your eligibility under Criterion C3.

If after completing this worksheet you cannot make a determination that your discharges and discharge-related activities are not likely to adversely affect ESA listed threatened or endangered species or designated critical habitat, you must submit this completed worksheet to EPA, and you may not file your NOI for permit coverage until you receive a determination from EPA that your discharges and/or discharge-related activities are not likely to adversely affect ESA-protected species and critical habitat.

Note: Much of the information needed for this form can be obtained from your draft SWPPP which will be needed when you file your NOI.

Section I. Operator, Facility, and Site Location Information

1) Operator Information:

a) Operator Name: Aaron Industries Corp.

b) Point of Contact: Luis Rivera

Phone: 978-534-6135 Ext. 40

E-mail: luisr@aaroninc.com

2) Facility Information

a) Facility Name: Aaron Industries Corp.

b) Check which of the following applies:

☐ I am seeking coverage under the MSGP as a new discharger or as a new source

☐ I am seeking coverage under the MSGP as an existing discharger and my facility has modifications to its discharge characteristics (e.g., changes in discharge flow or area drained, different pollutants) and/or discharge-related activities (e.g., stormwater controls)

Indicate the number of years the facility has been in operation: _____ years

Provide your NPDES ID (i.e., permit tracking number) from your previous MSGP coverage: _____

☑ I am seeking coverage under the MSGP as an existing discharger and there are no modifications to my facility.

Indicate the number of years the facility has been in operation: 38 years

Provide your NPDES ID (i.e., permit tracking number) from your previous MSGP coverage: MAR053872

c) Facility Address:

Address 1 Street/ Location: 8 & 20 Mohawk Drive

Address 2:

City: Leominster State: MA ZIP Code: 01453-

d) Identify the primary industrial sector to be covered under the 2021 MSGP:

SIC Code 3087 **or** **Primary Activity Code**

Sector Y **and** **Subsector** Y2

e) Identify the sectors of any co-located activities to be covered under the 2021 MSGP:

Sector ____ **and** **Subsector** ____

Sector ____ **and** **Subsector** ____

Sector ____ **and** **Subsector** ____

Sector ____ **and** **Subsector** ____

Sector ____ **and** **Subsector** ____

Sector ____ **and** **Subsector** ____

f) Estimated area of industrial activity exposed to stormwater: 6.3 acres

g) Provide a general description of the industrial activities that are taking place at this facility:

The Facility reporcesses and specialty compounds resins (including polypropylene, polystyrene and polyethylene).

3) Receiving Waters Information

List all the stormwater outfalls from your facility				For each outfall, provide the following receiving water information:	
Discharge Point ID	**Design Capacity (if known)**	**Latitude (decimal degrees)**	**Longitude (decimal degrees)**	**Name of the receiving water that receives stormwater from the discharge point and/or from the MS4 that the discharge point discharges to**	**Type of Waterbody (e.g., lake, pond, river/stream/creek, estuarine/marine water)**
003		42.5256° N	-71.7352° W	NORTH NASHUA RIVER	River
004		42.5274° N	-71.7337° W	NORTH NASHUA RIVER	River
005		42.5270° N	-71.7361° W	NORTH NASHUA RIVER	River
		__.____° N	___.____° W		
		__.____° N	___.____° W		

Section II. Action Area

As required in Step 2 of Section E.4 of Appendix E, you must include a map and a written description of the action area of your facility in Attachment 1 of this appendix.

Section III. Listed Species and Critical Habitat

As required in Step 3 of Section E.4 of Appendix E, attach a copy of the species and critical habitat list(s) from the Service(s) to Attachment 2 of this appendix and use the list(s) to complete the rest of this worksheet. For FWS species, include the full printout from your IPaC query/Official Species List in Attachment 2. You can include the map from your IPaC query in Attachment 1.

Note: For the purposes of this permit, "terrestrial species" would not include animal or plant species that 1) spends any portion of its life cycle in a waterbody or wetland, or 2) if an animal, depends on prey or habitat that occurs in a waterbody or wetland. For example, shorebirds, wading birds, amphibians, and certain reptiles would not be considered terrestrial species under this definition. Please also be aware that some terrestrial animals (e.g., certain insects, amphibians) may have an aquatic egg or larval/juvenile phase.

Review your species list in Attachment 2, choose one of the following three statements, and follow the corresponding instructions:

☑ The species list includes only terrestrial species and/or their designated critical habitat. No aquatic or aquatic- dependent species or their critical habitat are present in the action area. **You may skip to Section IV of this form. You are not required to fill out Section V.**

☐ The species list includes only aquatic and/or aquatic-dependent species and/or their designated critical habitat. No terrestrial species or their critical habitat are present in the action area. **You may skip to Section V of this form and are not required to fill out Section IV.**

☐ The species list includes both terrestrial and aquatic or aquatic-dependent species and/or their designated critical habitat. **You must fill out both Sections IV and V of this form.**

Section IV. Evaluation of Discharge-Related Activities Effects

Note: You are only required to fill out this section if your facility's action area contains terrestrial species and/or their designated critical habitat. If your action area only contains aquatic and/or aquatic-dependent species and/or their designated critical habitat, you can skip directly to Section V.

Most of the potential effects related to coverage under the MSGP are assumed to occur to aquatic and/or aquatic-dependent species. However, in some cases, potential effects to terrestrial species and/or their critical habitat should be considered as well from any discharge-related activities that occur during coverage under the MSGP. Examples of discharge-related activities that could have potential effects on listed terrestrial species or their critical habitat include the storage of materials and land disturbances associated with stormwater management-related activities (e.g., the installation or placement of stormwater control measures).

A. Select the applicable statement(s) below and follow the corresponding instructions:

☐ There are no discharge-related activities that are planned to occur during my coverage under the 2021 MSGP. You can conclude that your discharge-related activities will have no likely adverse effects, and:

- If there are any aquatic or aquatic-dependent species and/or their critical habitat in your action area, you must skip to Section V, Evaluation of Discharge Effects, below.
- If there are no aquatic or aquatic-dependent species, you may skip to Section VI and verify that your activities will have no likely adverse effects. You must submit this form to EPA as specified in Section VII of this form. You may select criterion C on your NOI form and may submit your NOI for permit coverage 30 days after you have submitted this Criterion C Eligibility Form. You must also provide a description of the basis for the criterion you selected on your NOI form, **including the species and critical habitat list(s) in your action area,** as well as any other documentation supporting your eligibility. You must also include this completed Criterion C Eligibility Form in your SWPPP.

☑ There are discharge-related activities planned as part of the proposal. Describe your discharge- related activities in the following box and continue to (b) below.

On-site operations include: Loading and unloading of polypropylene, polystyrene and polyethylene pellets, all materials are stored inside or in silos.

B. In order to ensure any discharge-related activities will have no likely adverse effects on ESA- listed threatened and endangered species and/or their designated critical habitat, you must certify that all the following are true:

☑ Discharge-related activities will occur:

- on previously cleared/developed areas of the site where maintenance and operation of the facility are currently occurring or where existing conditions of the area(s) in which the discharge-related activities will occur precludes its use by listed species (e.g., work on existing impervious surfaces, work occurring inside buildings, area is not used by species), and
- if discharge-related activities will include the establishment of structures (including, but not limited to, infiltration ponds and other controls) or any related disturbances, these structures and/or disturbances will be sited in areas that will not result in isolation or degradation of nesting, breeding, or foraging habitat or other habitat functions for listed animal species (or their designated critical habitat), and will avoid the destruction of native vegetation (including listed plant species).

☑ If vegetation removal (e.g., brush clearing) or other similar activities will occur, no terrestrial listed species that use these areas for habitat would be expected to be present during vegetation removal and these activities will not occur within critical habitat.

If all the above are true, you can conclude that your discharge-related activities will have no likely adverse effects, and:

- If there are any aquatic or aquatic-dependent species and/or critical habitat in your action area, you must skip to Section V, Evaluation of Discharge Effects, below.
- If there are no aquatic or aquatic-dependent species, you may skip to Section VI and verify that your activities will have no likely adverse effects. You must submit this form to EPA as specified in Section VII of this form. You may select criterion C on your NOI and may submit your NOI for permit coverage 30 days after you have submitted this completed form. You must also provide a description of the basis for the criterion you selected on your NOI form, **including the species and critical habitat list(s)**, and any other documentation supporting your eligibility. You must also include this completed Criterion C Eligibility Form in your SWPPP.
- **If any of the above are not true**, you cannot conclude that your discharge-related activities will have no likely adverse effects. You must complete the rest of this form (if applicable) and must submit the form to EPA for assistance in determining your eligibility for coverage.

Section V. Evaluation of Discharge Effects

Note: You are only required to fill out this section if your facility's action area includes aquatic and/or aquatic-dependent species and/or their critical habitat.

In this section, you will evaluate the likelihood of adverse effects from your facility's discharges. The scope of effects to consider will vary with each facility and species/critical habitat characteristics. The following are examples of discharge affects you should consider:

- *Hydrological Effects.* Stormwater discharges may adversely affect receiving waters by causing changes in water quality parameters such as turbidity, temperature, salinity, or pH. Stormwater discharges may adversely affect the immediate vicinity of the discharge point through streambank erosion and scour. These effects will vary with the amount of stormwater discharged and the volume and condition of the receiving water. Where a stormwater discharge constitutes a minute portion of the total volume of the receiving water, adverse hydrological effects are less likely.

- *Toxicity of Pollutants.* Pollutants in stormwater may have toxic effects on listed species and may adversely affect critical habitat. Exceedances of benchmarks, effluent limitation guidelines, or state or tribal water quality requirements may be indicative of potential adverse effects on listed species or critical habitat. However, some listed species may be adversely affected at pollutant concentrations below benchmarks, effluent limitation guidelines, and state or tribal water quality standards due to exposures to multiple stressors at the same time. In addition, stormwater pollutants identified in Part 6.2.3.2 of your SWPPP, but not monitored as benchmarks or effluent limitation guidelines, may also adversely affect listed species and critical habitat.

As these effects are difficult to analyze for listed species, their prey, habitat, and designated critical habitat, this form helps you to analyze your discharges to make a determination of whether your discharges will likely have adverse effects and whether there are any additional controls you can implement to ensure no likely adverse effects.

A. Evaluation of Pollutants and Controls to Avoid Adverse Effects. In this section, you must document **all** of your pollutant sources and pollutants expected to be discharged in stormwater (see Part 8). You must also document the controls you will implement to avoid adverse effects on listed aquatic and aquatic-dependent species and critical habitat. You must include specific details about the expected effectiveness of the controls in avoiding adverse effects to the listed aquatic-and aquatic-dependent species and critical habitat. Attach additional pages if needed.

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species and Critical Habitat. Include information supporting why the control(s) will ensure no adverse effects, including any data you have about the effectiveness of the control(s) in reducing pollutant concentrations. You may also attach photos of your controls to this form
e.g., *vehicle and equipment fueling*	*e.g.,* • *Oil & grease* • *Diesel* • *Gasoline* • *TSS* • *Antifreeze*	*e.g.,* • *Fueling operators (including the transfer of fuel from tank trucks) will be conducted on an impervious or contained pad or under cover* • *Drip pans will be used where leaks or spills of fuel can occur and where making and breaking hose connections* • *Spill kit will be kept on-site in close proximity to potential spill areas* • *Any spills will be cleaned-up immediately using dry clean-up methods* • *Stormwater runoff will be diverted around fueling areas using diversion dikes and curbing*

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species and Critical Habitat.

☐ Check if you are not able to make a preliminary determination that any of your pollutants will be controlled to a level necessary to avoid adverse effects on aquatic and/or aquatic-dependent listed species and their designated critical habitat. You must check in Section VI that you are unable to make a determination of no likely adverse effects and must complete the rest of the form. You must submit your completed form to EPA for assistance in determining your eligibility for coverage.

B. Analysis of Effects Based on Past Monitoring Data. Select which of the following applies to your facility:

☐ I have no previous monitoring data for my facility because there are no applicable monitoring requirements for my facility's sector(s).

☐ I have no previous monitoring data for my facility because I am a new discharger or a new source, but I am subject to monitoring under the 2021 MSGP. You must provide information to support a conclusion that your facility's discharges are not expected to result in benchmark or numeric effluent limit exceedances that will adversely affect listed species or their critical habitat:

☑ My facility has not had any exceedances under the 2015 MSGP of any required benchmark(s) or numeric effluent limits. I comply with the applicable monitoring requirements and have not had any exceedances

☐ My facility has had exceedances of one or more benchmark(s) or numeric effluent limits under the 2015 MSGP, but I have addressed them during my coverage under the 2015 MSGP, or in my evaluation of controls to avoid adverse effects in (A) above. Describe all actions (including specific controls) that you will implement to ensure that the pollutants in your discharge(s) will not result in likely adverse effects from future exceedances.

☐ Check if your facility has had exceedances of one or more benchmarks or numeric effluent limits under the 2015 MSGP and you have not been able to address them to avoid adverse effects from future exceedances, or if you are a new discharger or a new source but you are not sure if you can avoid adverse effects from possible exceedances. You must check in Section VI that you are unable to make a determination of no likely adverse effects. You must submit your completed form to EPA for assistance in determining your eligibility for coverage. You may not file your NOI for permit coverage until you are able to make a determination that your discharges will avoid adverse effects on listed species and designated critical habitat.

Section VI. Verification of Preliminary Effects Determination

Based on Steps I – V of this form, you must verify your preliminary determination of effects on listed species and designated critical habitat from your discharges and/or discharge-related activities:

☑ Following the applicable Steps in I – V above, I have provided information supporting a preliminary determination that my discharges and/or discharge-related activities are not likely to adversely affect listed species and designated critical habitats.

☐ Following the applicable Steps in I – V above, I am **not** able to provide information supporting a preliminary determination that my discharges and/or discharge-related activities are not likely to adversely affect listed species and designated critical habitats.

I. Certification Information

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.

First Name, Middle, Last Name: Luis Rivera

Title: Plant Manager

Signature: [signature]

Date: 05 26 2021

E-mail: luisr@aaroninc.com

Section VII. Criterion C Eligibility Form Submission Instructions

Only if the applicable EPA Regional Office has granted you a waiver from electronic reporting, you must submit this completed form to EPA at msgpesa@epa.govm, including any attachments and any additional information that demonstrates how you will avoid or eliminate adverse effects to listed threatened and endangered species or designated critical habitat (e.g., specific controls you will implement to avoid or eliminate adverse effects). **Any missing or incomplete information may result in a delay of your coverage under the permit.**

If you have made a preliminary determination that your discharges and/or discharge-related activities are not likely to adversely affect listed species and critical habitat, this form must be submitted a minimum of 30 days prior to submitting your NOI for permit coverage under criterion C. Please note that during either the 30-day Criterion C Eligibility Form review period prior to your NOI submission, or within 30 days after your NOI submission and before you have been authorized for permit coverage, EPA may advise you that additional information is needed, or that there are additional measures you must implement to avoid likely adverse effects.

If you are unable to make a preliminary determination that your discharges and/or discharge- related activities are not likely to adversely affect listed species and critical habitat, this worksheet must be submitted to EPA, but you may not file your NOI for permit coverage until you have received a determination from EPA that your discharges and/or discharge-related activities are not likely to adversely affect listed species and critical habitat.

Attachment 1

Include a **map and a written description** of the action area of your facility, as required in Step 2 of Section E.4 of Appendix E. You may choose to include the map that is generated from the FWS' on-line mapping tool IPaC (the Information, Planning, and Consultation System) located at http://ecos.fws.gov/ipac/.

The written description of your action area that accompanies your action area map must explain your rationale for the extent of the action area drawn on your map. For example, your action area written description may look something like this:

> *The action area for the (name of your facility)'s stormwater discharges extends downstream from the outfall(s) in (name of receiving waterbody) (# of meters/feet/kilometers/miles). The downstream limit of the action area reflects the approximate distance at which the discharge waters and any pollutants would be expected to cause potential adverse effects to listed species and/or critical habitat because (insert rationale). The action area does/does not extend to the (name of receiving waterbody)'s confluence with (name of confluence waterbody) because (insert rationale).*

Note that your action area written description will be highly site-specific, depending on the expected effects of your facility's discharges and discharge-related activities, receiving waterbody characteristics, etc.

Attachment 2

List or attach the list(s) of species and critical habitat in your action area on this sheet, as required in Step 3 of Section E.4 of Appendix E. You must include a list for applicable listed NMFS and USFWS species and critical habitat. If there are listed species and/or critical habitat for only one Service, you must include a statement confirming there are no listed species and/or critical habitat for the other Service. For USFWS species, include the USFWS Official Species List full printout from your IPaC query (including the consultation code and event code at the top of the FWS printout). *Note: If your Official Species List from the USFWS indicated no species or critical habitat were present in your action area, include the consultation code and event code that can be found at the top of your Official Species List in your NOI basis statement. If an Official Species List was not available on IPaC, list the contact date, the ecological services field office and the name of the Service staff with whom you corresponded to identify the existence of any USFWS species or critical habitat present in your action area.*

Paperwork Reduction Act Notice

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
http://www.fws.gov/newengland

In Reply Refer To: May 21, 2021
Consultation Code: 05E1NE00-2021-SLI-3420
Event Code: 05E1NE00-2021-E-10305
Project Name: Aaron Industries MSGP

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
(603) 223-2541

Project Summary

Consultation Code: 05E1NE00-2021-SLI-3420
Event Code: 05E1NE00-2021-E-10305
Project Name: Aaron Industries MSGP
Project Type: ** OTHER **
Project Description: Update MSGP for 2021
Project Location: 8 & 20 Mohawk Drive

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@42.52690685,-71.73471523545115,14z

Counties: Worcester County, Massachusetts

The action area for the Aaron Industries Corp. stormwater discharge extends downstream from Outfalls **003, 004** and **005** in the municipal separate stormwater sewer on Lock Drive approximately 100 feet. The downstream limit of the action area reflects the approximate distance at which the discharge waters and any pollutants would be expected to cause potential adverse effects to listed species an/or critical habitat because of the drainage area collecting stormwater. The action area does not extend to the North Nashua River due to limited volume of stormwater generated from the site.

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Attachment F
Notice of Intent

Appendix G - Notice of Intent (NOI) Form

Part 7.2 requires you to use the NPDES eReporting Tool, or "NeT", to prepare and submit your Notice of Intent (NOI). However, if the applicable EPA Regional office grants you a waiver to use a paper NOI form, and you elect to use it, you must complete and submit the following form.

Submission of this NOI constitutes notice that the operator identified in Section C of this form requests authorization to discharge pursuant to the NPDES Multi-Sector General Permit (MSGP) permit number identified in Section B of this form. Submission of this NOI also constitutes notice that the operator identified in Section C of this form meets the eligibility conditions of Part 1.1 of the MSGP for the facility identified in Section D of this form. To obtain authorization, you must submit a complete and accurate NOI form. Discharges are not authorized if your NOI is incomplete or inaccurate or if you were never eligible for permit coverage. Refer to the instructions at the end of this form to complete your NOI.

NPDES FORM 3510-6	EPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	OMB No. 2040-0300 Exp. Date: 3/31/2024

Submission of this Notice of Intent (NOI) constitutes notice that the operator identified in Section C of this form requests authorization to discharge pursuant to the NPDES Stormwater Multi-Sector General Permit (MSGP) permit number identified in Section B of this form. Submission of this NOI also constitutes notice that the operator identified in Section C of this form meets the eligibility conditions of Part 1.1 of the MSGP for the facility identified in Section D of this form. To obtain authorization, you must submit a complete and accurate NOI form. Discharges are not authorized if your NOI is incomplete or inaccurate or if you were never eligible for permit coverage. Refer to the instructions at the end of this form to complete your NOI.

A. Approval to Use Paper NOI Form

1. Have you been granted a waiver from electronic reporting from the EPA Regional Office*? ☐ YES ☐ NO

If yes, check which waiver you have been granted, the name of the EPA Regional Office staff person who granted the waiver, and the date of approval:

Waiver granted: ☐ The owner/operator's headquarters is physically located in a geographic area (i.e., ZIP code or census tract) that is identified as under-served for broadband Internet access in the most recent report from the Federal Communications Commission.

☐ The owner/operator has issues regarding available computer access or computer capability

Name of EPA staff person that granted the waiver: _____

Date approval obtained: __ / __ / ____

*** Note: You are required to obtain approval from the applicable EPA Regional Office prior to using this paper NOI form. If you have not obtained a waiver, you must file this form electronically using the NPDES eReporting Tool (NeT) at http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-EPAs-MultiSector-General-Permit.cfm**

B. Permit Information

NPDES ID (EPA Use Only): _____

1. Master Permit Number: MAR050000 (see Appendix C of the MSGP for the list of eligible master permitnumbers)
2. Are you a new discharger or a new source as defined in Appendix A? ☐ YES ☑ NO (If yes, skip to Part C of this form).
3. If you are not a new discharger or a new source, have stormwater discharges from your facility been covered previously under an NPDES permit?
   ☑ YES ☐ NO

If yes, provide the NPDES ID if you had coverage under EPA's 2015 MSGP or the NPDES ID if you had coverage under an EPA individual permit: MAR053872

4. Do you have a pending enforcement action related to industrial stormwater by EPA, a state, or a citizen (to include both notices of violation (NOVs) by EPA or a state and notices of intent to bring a citizen suit)? ☐ YES ☑ NO

C. Facility Operator Information

1. Operator Information:

Operator Name: Aaron Industries Corp.

2. Mailing Address:

Street: 8 & 20 Mohawk Drive

City: Leominster State: MA ZIP Code: 01453-

County or Similar Government Subdivision: Worcester

Phone: 978-534-6135 Ext. 40

E-mail: Luisr@aaroninc.com

2. Operator Point of Contact Information:

First Name, Middle Initial, Last Name: Luis _____ Rivera

Title: Plant Manager

3. NOI Preparer Information (Complete if NOI was prepared by someone other than the certifier):

First Name, Middle Initial, Last Name: Arkadiusz _____ Myszka

Organization: HRP Associates

Phone: 860-674-9570 Ext. 1158

E-mail: Arek.myszka@hrpassociates.com

D. Facility Information

1. Facility Name: Aarom Industries Corp.

2. Facility Address:

Street/Location: 8 & 20 Mohawk Drive

City: Leominster State: MA ZIP Code: 01453-

County or Similar Government Subdivision: Worcester

3. Latitude/Longitude for the facility:

Latitude: 42.5267 ° N (decimal degrees) Longitude: 71.7347 ° W (decimal degrees)

Latitude/Longitude Data Source: ☑ Maps ☐ GPS ☐ Other _____

If you used a USGS topographic map, what was the scale? _____

Horizontal Reference Datum: ☐ NAD 27 ☑ NAD 83 ☐ WGS 84

4. Is your facility located on Indian Country lands? ☐ YES ☑ NO

If yes, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if applicable):

_____

5. Are you requesting coverage under this NOI as a "federal operator" as defined in Appendix A? ☐ YES ☑ NO

6. What is the ownership type of the facility?

☐ Federal Facility (U.S.Government) ☐ Privately Owned Facility ☐ Municipality ☐ County Government

☑ Corporation ☐ State Government ☐ Tribal Government ☐ School District

☐ District ☐ Mixed Ownership (e.g., Public/Private) ☐ Municipal or Water District

7. Estimated area of industrial activity at your facility exposed to stormwater: 6.3 (to the nearest quarter acre)

8. Sector-Specific Information

Identify the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in the MSGP, and the applicable sector and subsector of your primary industrial activity (See Appendix D):

Primary SIC Code 3087 **OR Primary Activity Code:**

Sector: Y **Subsector:** Y2

Identify the applicable sector(s) and subsector(s), SIC codes, and activity codes of any co-located industrial activity for which you are requesting permit

Sector: **Subsector:** **Sector:** **Subsector:** **Sector:** **Subsector:**

Sector: **Subsector:** **Sector:** **Subsector:** **Sector:** **Subsector:**

If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis? ☐ YES ☑ NO

If you are a Sector G (Metal Mining) facility, do you have discharges from waste rock and overburden piles? ☐ YES ☑ NO

Check the type of ore you mine at your facility:

☐ Tungsten Ore ☐ Nickel Ore ☐ Aluminum Ore ☐ Mercury Ore

☐ Iron Ore ☐ Platinum Ore ☐ Titanium Ore ☐ Vanadium Ore

☐ Molybdenum ☐ Uranium, Radium, and/or Vanadium Ore ☐ Ore not listed

9. Is your facility presently inactive and unstaffed and are there no industrial materials or activities exposed to stormwater?* ☐ YES ☑ NO

*The requirement for benchmark monitoring does not apply at a facility that is inactive and unstaffed, provided that there are no industrial materials or activities exposed to stormwater. Note that if your facility becomes inactive and unstaffed and/or industrial materials or activities become exposed to stormwater during the permit term, you must submit an NOI modification to reflect the change.

E. Discharge Information

1. By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the authorized stormwater discharges in Part 1.2.1 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the authorized stormwater and non-stormwater discharges listed in Parts 1.2.1 and 1.2.2 will be discharged, they must be covered under another NPDES permit. ☑ YES

2. Federal Effluent Limitation Guidelines

Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines? ☐ YES ☑ NO

If yes, which effluent limitation guidelines apply to your stormwater discharges?

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	New Source Date	Check if Applicable
Part 411, Subpart C	Runoff from material storage piles at cement manufacturing facilities	E	2/20/1974	☐
Part 418 Subpart A	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	C	4/8/1974	☐
Part 423	Coal pile runoff at steam electric generating facilities	O	11/19/1982 10/8/1974[1]	☐
Part 429, Subpart I	Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	A	1/26/1981	☐
Part 436, Subpart B, C, or D	Mine dewatering discharges at crushed stone mines, construction sand and gravel mines, or industrial sand mines	J	N/A	☐
Part 443, Subpart A	Runoff from asphalt emulsion facilities	D	7/28/1975	☐
Part 445, Subparts A & B	Runoff from hazardous waste and non-hazardous waste landfills	K, L	2/2/2000	☐
Part 449	Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	S	6/15/2012	☐

[1]NSPS promulgated in 1974 were not removed via the 1982 regulation; therefore, wastewaters generated by Part 423-applicable sources that were New Sources under the 1974 regulations are subject to the 1974 NSPS.

3. Receiving Waters Information: (Attach a separate list if necessary)

List all of the stormwater discharge points from your facility. Each discharge point must be identified by a unique 3-digit ID (e.g., 001, 002). Also provide the latitude and longitude in degrees decimal for each discharge point.		**For each outfall, provide the following receiving water information:**					
		Provide the name of the first water of the U.S. that receives stormwater directly from the discharge point and/or from the MS4 that the outfall discharges to:	**If the receiving water is impaired (on the CWA 303(d) list), list the pollutants that are causing the impairment:**	**If a TMDL has been completed for this receiving waterbody, providing the following information:**	**Is this receiving water saltwater or freshwater?**	**Is this receiving water designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) or as a Tier 3 water (Outstanding National Resource Water)?**	***For freshwater discharges from operators in subsectors K1 and G2 only:* is this receiving water still/standing (lentic) (e.g., lake or impoundment) or flowing (lotic) (e.g., river or stream)?**
Discharge Point ID	003	NORTH NASHUA RIVER	E.Coli	TMDL ID:_____ Pollutants for which there is a TMDL: _____	☑ Freshwater ☐ Saltwater	☐ Tier 2/2.5 ☐ Tier 3 (Outstanding National Resource Waters)*	☐ Still/standing ☐ Flowing
Latitude	42.5256						
Longitude	-71.7352						
Discharge Point ID	004	NORTH NASHUA RIVER	E.Coli	TMDL ID:_____ Pollutants for which there is a TMDL: _____	☑ Freshwater ☐ Saltwater	☐ Tier 2/2.5 ☐ Tier 3 (Outstanding National Resource Waters)*	☐ Still/standing ☐ Flowing
Latitude	42.5274						
Longitude	-71.7337						
If substantially identical to other discharge point, list identical discharge point ID:							
Discharge Point ID	005	NORTH NASHUA RIVER	E.Coli	TMDL ID: Pollutants for which there is a TMDL: _____	☑ Freshwater ☐ Saltwater	☐ Tier 2/2.5 ☐ Tier 3 (Outstanding National Resource Waters)*	☐ Still/standing ☐ Flowing
Latitude	42.5270						
Longitude	-71.7361						
If substantially identical to other discharge point, list identical discharge point ID: _____							

*Note: You are ineligible for coverage if you are a new discharger or new source to waters designated as Tier 3 (Outstanding National Resource Waters) for antidegradation purposes under 40 CFR 131.13(a)(3).

4. Provide the following Information about your discharge point latitude/longitude: 42.5256° N -71.7352° W

Latitude/Longitude Data Source: Maps

If you used a USGS topographic map, what was the scale? _____

Horizontal Reference Datum: ☐ NAD 27 ☑ NAD 83 ☐ WGS 84

5. Does your facility discharge into a Municipal Separate Storm Sewer System (MS4)? ☑ YES ☐ NO

If yes, provide the name of the MS4 operator: Leominster MS4

6. If you are subject to benchmark monitoring requirements for a hardness-dependent metal, what is the hardness of your receiving water(s) (see Appendix J)?_____(mg/L)

7. For facilities in EPA Region 10: Does your facility discharge to a federal CERCLA site listed in Appendix P? ☐ YES ☑ NO

7.a. If yes, did you notify the EPA Regional Office in advance of filing your NOI, and did the EPA Regional Office determine that you are eligible for permit coverage pursuant to Part 1.1.7*? ☐ YES ☐ NO

*** Note: If you discharge to a federal CERCLA site listed in Appendix P, you are ineligible for coverage under this permit unless you notify the EPA Regional Office in advance and the EPA Regional Office determines you are eligible coverage under this permit. In determining your eligibility for coverage under this Part, the EPA Regional Office may evaluate whether you have included adequate controls and/or procedures to ensure that your discharges will not lead to recontamination of aquatic media at the CERCLA Site such that it will cause or contribute to an exceedance of a water quality standard.**

8. *For operators in New Mexico only:* Do you anticipate the discharge of groundwater or spring water from your facility? ☐ YES ☐ NO

*If yes, below you are asked to provide information on flow and potential to encounter impacted ground or spring water such that there is a potential for contamination. If potential for contamination exists, you will be asked to provide test result data to EPA Region 6 and the NMED Surface Water Quality Bureau. If the test data exceed State Water Quality Standards, the ground or spring water cannot be discharged from the facility into surface waters under this permit. Discharge to surface waters must be conducted under a separate NPDES individual permit to ensure proper treatment and disposal. If disposal will be to the ground surface or in an unlined pond, you must submit a Notice of Intent to Discharge (NOI) to the NMED Ground Water Quality Bureau. For further assistance determining whether your facility may encounter impacted groundwater, the permittee may contact the NMED Ground Water Quality Bureau at (505) 827-2965.

8.a. If yes, what is the anticipated flow rate of the groundwater or spring water? _____

8.b. Provide information on the potential to encounter impacted ground or spring water in the space provided below:

8.c. Using the Mapper tool located at https://gis.web.env.nm.gov/oem/ for reference, check if the following groundwater pollutant sources are located nearby the anticipated source of groundwater or spring water such that there is potential for contamination:

Project Location Relative to a Source of Potential Groundwater Contamination	Constituents likely to be required for testing	Check if applicable
Within 0.5 mile of an open Leaking Tank site	BTEX (Benzene, Toluene, Ethylbenzene, and Xylene) plus additional parameters depending on site conditions.	☐
Within 0.5 mile of an open Voluntary Remediation site	All parameters listed in 20.6.4.900 NMAC, hardness and pH (or an alternate list approved by the NMED SWQB)	☐
Within 0.5 mile of an open RCRA Corrective Action site	All parameters listed in 20.6.4.900 NMAC, hardness and pH (or an alternate list approved by the NMED SWQB)	☐
Within 0.5 mile of an open Abatement site	All parameters listed in 20.6.4.900 NMAC, hardness and pH (or an alternate list approved by the NMED SWQB)	☐
Within 0.5 mile of an open Brownfield site	All parameters listed in 20.6.4.900 NMAC, hardness and pH (or an alternate list approved by the NMED SWQB)	☐
Within 1.0 mile of a Superfund site with associated groundwater contamination	All parameters listed in 20.6.4.900 NMAC, hardness and pH (or an alternate list approved by the NMED SWQB)	☐
EPA approved-sufficiently sensitive methods must be used – approved methods are listed in 40 C.F.R. 136.3.		

8.d. If any of the above are applicable, provide a summary of test data indicating the quality of the groundwater or spring water to be discharged:

F. Stormwater Pollution Prevention Plan (SWPPP) Information

1. Has the SWPPP been prepared in advance of filing this NOI,as required?

2. SWPPP Contact Information:

First Name, Middle Initial, Last Name: Arkadiusz Myszka

Professional Title: Project Consultant

Phone: 860-674-9624 Ext. 1158

E-mail: Arek.myszka@hrpassociates.com

3. SWPPP Availability:

Your current SWPPP or certain information from your SWPPP must be made available through one of the following two options. Select one of the options and provide the required information*:

*** Note: You are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.**

☐ **Option 1**: Maintain a current copy of your SWPPP on an Internet page (Universal Resource Locator or URL).

Provide the web address URL:_____

☑ **Option 2**: Provide the following information from your SWPPP:

A. Describe your onsite industrial activities exposed to stormwater (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams), and potential spill and leak areas:

On-Site industrial activities potentially exposed to stormwater include:
- Receiving of raw materials to on-site buildings and silos;
- Shipping of produced resin pellets;
- Storage of raw plastic pellet in silos;
- Storage and transfer of raw material and final resin product in truck trailers'

B. List the pollutant(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and any authorized non-stormwater discharges listed in Part 1.2.2:

The following is a list of exposed industrial activities on-site and their associated potential stormwater pollutants:
- Storage and transfer of general refuse and plastic pellets - total suspended solids;
- Delivery of mineral and other oils- oil & grease, petroleum hydrocarbons;
- Storage, loading, shipping of plastic pelletsand resin - total suspended solids;
- Shipment of waste oil - oil & grease, petroleum hydrocarbons;

C. Describe the control measures you will employ to comply with the non-numeric technology-based effluent limits required in Part 2.1.2 and Part 8, and any other measures taken to comply with the requirements in Part 2.2 Water Quality-Based Effluent Limitations (see Part 6.2.4):

Structural controls or practices used to minimize the exposure of industrial activities to rain, snow, snowmelt and runoff on-site include keeping dumpster/compactor covered and loading waste from inside the buidling, overseeing all deliveries and transfers of chemicals/petroleum, and fabric liners in catch basin closest to silo storage area and in Outfall 001/Outfall 003. Quarterly inspections of all areas of significant stormwater pollution and stormwater outfall, daily visual inspections of the dumpster/compactor and surrounding area for debris, and inspection procedures for the cleanout of the silos. The facility also maintains spill response equipment on-site.

D. Provide a schedule for good housekeeping and maintenance (see Part 6.2.5.1) and a schedule for all inspections required in Part 3 (see Part 6.2.5.2):

Facility personnel will perform quarterly inspections of on-site silos, dumpster/compactor, and waste and raw material storage containers to identify leaks or conditions that could lead to the discharge of toxic or hazardous chemicals to the storm water system. Materials are stored indoors and if necessary to store material outdoors, those materials are under a roof to minimize contact with stormwater. The only storage exception is for the silos which are located outside. Regular inspections of waste storage areas are also conducted to determine when pickup and disposal of waste materials (i.e. dumpsters, waste containers) should occur.

G. Endangered Species Protection

Using the instructions in Appendix E of the MSGP and the Criterion Selection Worksheet in Appendix E, Part E.4, under which criterion listed below are you eligible for coverage under this permit?* You must consider Endangered Species Act listed (ESA-listed) threatened or endangered species and/or designated critical habitat(s) under the jurisdiction of both the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) and check only the 1 box that is the most conservative criterion that applies to your facility stormwater discharge.

*Note: You must use the information from the USFWS IPaC and NMFS Species Directory (see MSGP Appendix E, Part E.4, Step 2 and 3) when determining the presence of ESA-listed species and critical habitat. Attaching aerial image(s) of the site to this NOI is helpful to EPA, USFWS, and NMFS in confirming eligibility under this criterion. Please Note: NMFS' jurisdiction includes ESA-listed marine and estuarine species that spawn in inland rivers.

After you submit your NOI and before your NOI is authorized, EPA may notify you if any additional controls are necessary to ensure your discharges have no likely adverse effects on ESA-listed species and critical habitat.

☐ A. **No ESA-listed species and/or critical habitat present in action area.** No ESA-listed species and designated critical habitat(s) are likely to occur in your facility's "action area" as defined in Appendix A. You must provide a description below of the basis for selecting this criterion and provide documentation supporting your eligibility determination in your SWPPP. **[Basis statement content: A basis statement supporting the selection of this criterion should identify the USFWS and NMFS information sources used. State resources are not acceptable. Attaching aerial image(s) of the site to this NOI is helpful to EPA, USFWS, and NMFS in confirming eligibility under this criterion. Note that NMFS' jurisdiction includes ESA-listed marine and estuarine species that spawn in inland rivers.]**

☐ B. **Eligibility requirements met by another operator under the 2021 MSGP.** Your industrial activity's discharges and discharge-related activities were already addressed in another operator's valid certification of eligibility for your "action area" under eligibility criteria A, C, D, or E of the 2021 MSGP and you have confirmed that no additional ESA-listed species and designated critical habitat not considered in that certification may be present or located in the "action area" (e.g., due to a new species listing or critical habitat designation). To certify your eligibility under this criterion, there must be no lapse of NPDES permit coverage in the other 2021 MSGP operator's certification. By certifying eligibility under this criterion, you must comply with any conditions upon which the other operator's certification was based. You must include in your NOI the NPDES ID assigned to the other 2021 MSGP operator's authorization under this permit. If your certification is based on another 2021 MSGP operator's certification under criterion C, you must provide EPA with the relevant supporting information required (i.e., permit tracking number, industrial activity SWPPP, a description of the basis for the criterion selected) in your NOI form. **[Basis statement content: A basis statement supporting the selection of this criterion must identify the eligibility criterion of the other MSGP NOI, the authorization date, and confirmation that the authorization is effective.]**

If you select criterion B, provide the NPDES ID from the other operator's notification of authorization under this permit: _____

☐ C(1). **Facility eligible for Criterion C in the 2015 MSGP with NO CHANGE to listed species, critical habitat, or action area.** Your facility was eligible for Criterion C in the 2015 MSGP and there has been no change in your facility's action area and you have confirmed that there are no additional threatened or endangered species or designated critical habitat under the jurisdiction of the USFWS and/or NMFS in your action area since your certification under Criterion C in the 2015 MSGP. You must provide a description of the basis of this criterion selected on your NOI form and provide documentation supporting your eligibility determination in your SWPPP. [**Basis statement content: A basis statement supporting the selection of this criterion must provide the USFWS and/or NMFS resources consulted that helped you determine that there are no additional species and/or critical habitat under the jurisdiction of the Services in your action area.]**

☑ C(2). **Facility eligible for Criterion C in the 2015 MSGP with CHANGES to listed species, critical habitat, or action area.** Your facility was eligible for Criterion C in the 2015 MSGP, but there have been changes in your facility's action area, and/or there are additional threatened or endangered species and/or designated critical habitat under the jurisdiction of the USFWS and/or NMFS in your action area since your certification under Criterion C under the 2015 MSGP. You must provide a description of the basis of this criterion selected on your NOI form and provide documentation supporting your eligibility determination in your SWPPP. **[Basis statement content: A basis statement supporting the selection of this criterion must identify the following:**

1. A description of the changes in the facility's action area (if applicable).
2. The USFWS and/or NMFS resources consulted that helped you determine that additional species and/or critical habitat have been listed/designated by either of the Services in your action area.
3. What ESA-listed species and/or designated critical habitat are located in your "action area".
4. Distance in miles between your site and the ESA-listed species and/or designated critical habitat within the action area (in miles, state "on site" if the ESA-listed species and/or designated critical habitat is within the area to be disturbed.
5. A description of EPA approved measures you will implement or will continue to implement to ensure no likely adverse effects on ESA-listed species and/or critical habitat.]

☐ C(3). **ESA-listed species and/or designated critical habitat likely to occur, but discharges not likely to adversely affect them.** ESA-listed threatened or endangered species or their designated critical habitat(s) under the jurisdiction of USFWS and/or NMFS are likely to occur in or near your facility's "action area," and you certify to EPA that your industrial activity's discharges and discharge-related activities are not likely to adversely affect ESA-listed and/or critical habitat. To certify your eligibility under this criterion, you must complete the Criterion C Eligibility Form, which you must submit to EPA at least 30 days prior to filing your NOI for permit coverage. After evaluation of your Criterion C Eligibility Form, EPA may require additional measures that you must implement to avoid or eliminate likely adverse effects on ESA-listed species and/or critical habitat from discharges and discharge-related activities. You may submit your NOI for permit coverage 30 days after submitting to EPA your completed Criterion C Eligibility Form. You must also provide a description of the basis for the criterion you selected on your NOI form and provide documentation supporting your eligibility determination in your SWPPP.
[Basis statement content: A basis statement supporting the selection of this criterion must identify the following:

1. The USFWS and NMFS information resources and expertise (e.g., state or federal biologists) used to arrive at this conclusion. Any supporting documentation should explicitly state that both ESA-listed species and designated critical habitat under the jurisdiction of the USFWS and/or NMFS were considered in the evaluation.
2. What ESA-listed species and/or designated critical habitat are located in your "action area".
3. Distance in miles between your site and the ESA-listed species and/or designated critical habitat within the action area (in miles, state "on site" if the ESA-listed species and/or designated critical habitat is within the area to be disturbed).
4. A description of EPA approved measures you will implement to ensure no likely adverse effects on ESA-listed species and/or critical habitat
5. A statement affirming that "I submitted my completed Criterion C Eligibility Form to EPA at least 30 days prior to submitting this NOI and agree to implement any additional measures that were determined by EPA to be necessary to ensure that my discharges and/or discharge-related activities will not have likely adverse effects on listed species and critical habitat."
6. Date you sent completed Criterion C Eligibility form to EPA.]

☐ D. **ESA Section 7 consultation has successfully concluded.** Consultation between a Federal Agency and the U.S. Fish and Wildlife Service and/or the National Marine Fisheries Service under section 7 of the Endangered Species Act has concluded. The consultation must have addressed the effects of the facility's discharges and discharge-related activities on ESA-listed species and/or designated critical habitat under the jurisdiction of USFWS and/or NMFS. To certify eligibility under this criterion, indicate the result of the consultation:

1. A biological opinion and/or conference opinion that concludes that the action in question (taking into account the effects of your facility's discharges and discharge-related activities) is not likely to jeopardize the continued existence of ESA-listed species, or result in the destruction or adverse modification of designated critical habitat; or

2. Written concurrence from the applicable Service(s) with a finding that your facility's discharges and discharge-related activities are not likely to adversely affect ESA-listed species or designated critical habitat.

You must verify that the consultation does not warrant reinitiation under 50 CFR §402.16. If reinitiation of consultation is required, in order to be eligible under this criterion you must ensure consultation is reinitiated and the result of the consultation must be consistent with Criterion D (i), or (ii) above.

If eligible under Criterion D, you must also provide supporting documentation for your determination in your NOI and SWPPP, including the Biological Opinion (or ECO tracking number) or concurrence letter. You must include copies of the correspondence between yourself and the USFWS and/or NMFS in your SWPPP and your NOI. **[Basis statement content: A basis statement supporting the selection of this criterion should identify the federal action agency(ies) involved, the field office/regional office(s) providing that consultation, any tracking numbers of identifiers associated with that consultation (e.g., IPaC number, ECO number), and the date the consultation was completed.]**

☐ E. **Issuance of section 10 permit.** Potential take is authorized through the issuance of a permit under section 10 of the ESA by the USFWS and/or NMFS, and this authorization addresses the effects of the facility's discharges and discharge-related activities on ESA-listed species and designated critical habitat. You must include copies of the correspondence between yourself and the participating agencies in your SWPPP and your NOI. **[Basis statement content: A basis statement supporting the selection of this criterion should identify whether USFWS or NMFS or both agencies provided a section 10 permit, the field office/regional office(s) providing permit(s), any tracking numbers of identifiers associated with that consultation (e.g., IPaC number, ECO number), and the date the permit was granted.]**

H. Historic Preservation

1. If your facility is not located on Indian country lands, is your facility located on a property of religious or cultural significance to an Indian tribe?

☐ YES ☑ NO

If yes, provide the name of the Indian tribe associated with theproperty:_____

2. Using the instructions in Appendix F of the MSGP, under which historic properties preservation criterion listed in Part 1.1.4.6 are you eligible for coverage under this permit (only check 1 box)?

☑ A ☐ B ☐ C ☐ D

I. Certification Information

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.

First Name, Middle, Last Name: Luis Rivera

Title: Plant Manager

Signature: _____ Date: 05 / 26 / 2021

E-mail: luisr@aaroninc.com

Instructions for Completing EPA Form 3510-6

Notice of Intent (NOI) for Stormwater Discharges Associated with Industrial Activity Under the NPDES Multi-Sector General Permit

This Form Replaces Form 3510-6 (06/15) Form Approved OMB No. 2040-0300

Who Must File an NOI Form

Under section 402(p) of the Clean Water Act (CWA) and regulations at 40 CFR Part 122, stormwater discharges associated with industrial activity are prohibited to waters of the United States unless authorized under a National Pollutant Discharge Elimination System (NPDES) permit. You can obtain coverage under the MSGP by submitting a completed Notice of Intent (NOI) if you are an operator of a facility:

- that is located in a jurisdiction where EPA is the permitting authority, listed in Appendix C of the MSGP,
- that discharges stormwater associated with industrial activities, identified in Appendix D of the MSGP,
- that meets the eligibility requirements in Part 1.1 of the permit,
- that has developed a stormwater pollution prevention plan (SWPPP) in accordance with Part 6 of the MSGP; and
- that installs and implements control measures in accordance with Part 2 and Part 8 to meet numeric and non-numeric effluent limits.

Completing the Form

Obtain and read a copy of the 2021 MSGP, viewable at http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm. To complete this form, type or print, using uppercase letters, in the appropriate areas only. Please place each character between the marks. Abbreviate if necessary to stay within the number of characters allowed for each item. Use only one space for breaks between words, but not for punctuation marks unless they are needed to clarify your response. **Please submit original document with signature in ink - do not send a photocopied signature.**

Section A. Approval to Use Paper NOI Form

You must indicate whether you have been granted a waiver from electronic reporting from the EPA Regional Office. Note that you are not authorized to use this paper NOI form unless the EPA Regional Office has approved its use. Where you have obtained approval to use this form, indicate the waiver that you have been granted, the name of the EPA staff person who granted the waiver, and the date that approval was provided.

See http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-Contacts.cfm for a list of EPA Regional Office contacts.

Section B. Permit Information

Provide the master permit number of the permit under which you are applying for coverage (see Appendix C of the general permit for the list of eligible master permit numbers).

You must indicate whether you are a new discharger or a new source (see Appendix A for the definitions). If you are not a new discharger or a new source, you must indicate whether stormwater discharges from your facility have been previously covered under another NPDES permit. If yes, you must provide the unique NPDES ID (i.e., permit tracking number) for the previous permit your facility was covered under.

You must also indicate whether you have a pending enforcement action by EPA, a state, or a citizen, related to industrial stormwater.

Section C. Facility Operator Information

Provide the legal name of the person, firm, public organization, or any other entity that operates the facility described in this NOI. An operator of a facility is the legal entity that controls the operation of the facility. Refer to Appendix A of the permit for the definition of "operator". Provide the operator's mailing address, phone number, and e-mail. Correspondence for the NOI will be sent to this address. Also provide the name and title for the operator point of contact (note that the point of contact name may be the same as the operator name).

If the NOI was prepared by someone other than the certifier (for example, if the NOI was prepared by the facility SWPPP contact or a consultant for the certifier's signature), include the full name, organization, phone number, and e-mail address of the NOI preparer.

Section D. Facility Information

Enter the official or legal name and complete address, including city, state, ZIP code, and county or similar government subdivision of the facility. If the facility lacks a street address, indicate the general location of the facility (e.g., Intersection of State Highways 61 and 34). Complete facility information must be provided for permit coverage to be granted.

Provide the latitude and longitude of your facility in decimal degrees format. The latitude and longitude of your facility can be determined in several different ways, including through the use of global positioning system (GPS) receivers, U.S. Geological Survey (USGS) topographic or quadrangle maps. Refer to http://transition.fcc.gov/mb/audio/bickel/DDDMMSS-decimal.html/ for assistance in providing the proper latitude/longitude format. For consistency, EPA requests that measurements be taken from the approximate center of the facility. Specify which method you used to determine latitude and longitude. If a USGS topographic map is used, specify the scale of the map used. Enter the horizontal reference datum for your latitude and longitude. The horizontal reference datum used on USGS topographic maps is shown on the bottom left corner of USGS topographic maps; it is also available for GPS receivers.

Indicate whether the facility is on Indian country lands, and if so, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if applicable).

Indicate whether you are seeking coverage under this permit as a "federal operator" as defined in Appendix A. Also check the ownership type for the facility (e.g., Federal Facility, Privately Owned Facility, Municipality, County Government, Corporation, State Government, Tribal Government, School District, District, Mixed Ownership [e.g., public/private], Municipal or Water District).

Enter the estimated area of industrial activity at your facility exposed to stormwater to the nearest quarter acre.

Indicate whether, during coverage under this permit, there will be stormwater discharges from paved surfaces that will be sealed or re-sealed with coal-tar where industrial activities are located.

List the four-digit Standard Industrial Classification (SIC) code or two character activity code that best describes the primary industrial activities performed by your facility under which you are required to obtain permit coverage. Your primary industrial activity includes any activities performed on-site which are (1) identified by the facility's primary SIC code and included in the descriptions of 40 CFR 122.26(b)(14)(ii), (iii), (vi), or (viii); or (2) included in the narrative descriptions of 40 CFR 122.26(b)(14)(i), (iv), (v), (vii), or (ix). See Appendix D of the MSGP for a complete list of SIC codes and activities codes covered under the MSGP. Also provide the applicable sector and subsector associated with the SIC code or activity code for your primary industrial activities. For a complete list of sector and subsector codes, see Appendix D of the MSGP.

If your facility has co-located industrial activities that are not identified as your primary industrial activity, identify the sector, subsector, SIC, and

Instructions for Completing EPA Form 3510-6

Notice of Intent (NOI) for Stormwater Discharges Associated with Industrial Activity Under the NPDES Multi-Sector General Permit

This Form Replaces Form 3510-6 (06/15) Form Approved OMB No. 2040-0300

For Sector A facilities (Timber Products), indicate whether you manufacture, use or store creosote or creosote treated wood in areas that are exposed to precipitation.

For Sector S facilities (Air Transportation), indicate whether you anticipate that the entire airport facility will use more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis. If so, additional effluent limits and monitoring conditions apply to your discharge (see Part 8.S of the permit).

For Sector G facilities (Metal Mining), check the type of ore(s) mined at the facility.

Indicate whether your facility is currently inactive and unstaffed. Note that if your facility becomes inactive and unstaffed and/or industrial materials or activities become exposed to stormwater during the permit term, you must submit an NOI modification to reflect the change.

Section E. Discharge Information

You must confirm that you understand that the MSGP only authorizes the allowable stormwater discharges listed in Part 1.2.1 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized under the MSGP are not covered by the MSGP or the permit shield provision of the CWA Section 402(k) and they cannot become authorized or shielded by disclosure to EPA, state, or local authorities via the NOI to be covered by the permit or by any other means (e.g., in the SWPPP or during an inspection). If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.2.1 and 1.2.2 will be discharged, they must either be eliminated or covered under another NPDES permit.

Depending on your industrial activities, your facility may be subject to federal effluent limitation guidelines which include additional effluent limits and monitoring requirements for your facility. Please review these requirements, described in Part 2.1.3 of the MSGP, and check any appropriate boxes on the NOI form.

You must identify all the discharge points from your facility that discharge stormwater. Each outfall must be assigned a unique 3-digit ID (e.g., 001, 002, 003). You must also provide the latitude and longitude for each discharge point from your facility. Indicate whether any discharge points are substantially identical to a discharge point already listed, and identify the discharge point it is identical to. For each unique discharge point you list, you must specify the name of the first water of the U.S. that receives stormwater directly from the discharge point and/or from the MS4 that the discharge point discharges to. You must specify whether any receiving waters that you discharge to are listed as "impaired" as defined in Appendix A, and the pollutants for which the water is impaired. You must also check identify any Total Maximum Daily Loads (TMDL) that have been completed for any of the waters of the U.S. that you discharge to. For each unique discharge point you must indicate whether the receiving water is saltwater or freshwater, and indicate whether discharges from the facility will enter into a water of the U.S that is designated as a Tier 2, Tier 2.5, or Tier 3 water. A list of Tier 2, 2.5, and 3 waters is provided as Appendix L. If the answer is "yes", name all waters designated as Tier 2, Tier 2.5, or Tier 3 to which the facility will discharge. Note that you are ineligible for coverage if you are a new discharger or a new source to waters designated as Tier 3 (outstanding national resource waters) for antidegradation purposes under 40 CFR 131.13(a)(3).

If your facility is in subsector K1 or G2, you must also indicate, for each unique discharge point, if the receiving water is still/standing (lentic) (e.g., a lake or impoundment) or flowing (lotic) (e.g., a river or stream).

You must also provide information about the discharge point latitude/longitude, including data source, the scale (if applicable), and the horizontal reference datum. See the instructions in Section D for more information about determining the latitude and longitude.

Identify whether your facility discharges into a Municipal Separate Storm Sewer System (MS4). If yes, provide the name of the MS4 operator. If you are uncertain of the MS4 operator, contact your local government for that information.

If you are subject to any benchmark monitoring requirements for metals (see the requirements applicable to your Sector(s) in Part 8 of the permit), indicate the hardness for your receiving water(s). See Appendix J of the permit for information about determining waterbody hardness.

If you are subject to benchmark monitoring requirements for hardness-dependent metals you must also answer whether your facility discharges into any saltwater receiving waters.

If our facility is located in EPA Region 10, indicate whether your facility will discharge to a federal CERCLA site listed in Appendix P. Note that if your facility will discharge into a federal CERCLA site listed in Appendix P, you are not eligible for coverage under this permit unless you notify the EPA Regional Office in advance and the EPA Regional Office authorizes overage under this permit after you have included adequate controls and/or procedures designed to ensure that discharges will not lead to recontamination of aquatic media at the CERCLA site such that your discharge will cause or contribute to an exceedance of a water quality standard.

Operators in New Mexico, indicate whether you anticipate the discharge of groundwater or spring water from your facility. If yes, you must provide information on flow and potential to encounter impacted ground or spring water such that there is a potential for contamination. You must also use the mapper tool located at https://gis.web.env.nm.gov/oem/ to determine if the groundwater sources listed are located near the anticipated source of groundwater or spring water such that there is potential for contamination. If potential for contamination exists, you must provide a summary of test data indicating the quality of the groundwater or spring water to be discharged.

Section F. Stormwater Pollution Prevention Plan (SWPPP) Information

All facilities eligible for coverage under this permit are required to prepare a SWPPP in advance of filing the NOI, in accordance with Part 6. Indicate whether the SWPPP has been prepared in advance of filing the NOI.

Indicate the contact information (name, phone, and e-mail) for the person who developed the SWPPP for this facility.

You identify how your SWPPP information will be made available, consistent with Part 5.4 and 7.3 of the permit. If you are making your SWPPP publicly available on a web site, check Option 1 and provide the appropriate Internet URL address. If you are not providing a URL, check Option 2 and provide the selected SWPPP information on this NOI form. You may copy and paste this information directly from your SWPPP.

Instructions for Completing EPA Form 3510-6

Notice of Intent (NOI) for Stormwater Discharges Associated with Industrial Activity Under the NPDES Multi-Sector General Permit

This Form Replaces Form 3510-6 (06/15) Form Approved OMB No. 2040-0300

Section G. Endangered Species Protection

Using the instructions in Appendix E, indicate the Part 1.1.4.5 criterion (i.e., A, B, C, D, or E) you are eligible under with regard to the protection of federally listed endangered and threatened species and designated critical habitat. A description of the basis for the criterion selected must also be provided.

If criterion B is selected, provide the NPDES ID (i.e., permit tracking number) for the other operator who has certified their eligibility under this permit. The NPDES ID was assigned when the operator received coverage under this permit.

If criterion C is selected, you must specify the federally-listed species or designated critical habitat that are located in the "action area" of the facility. You must also indicate under which scenario you determined you were eligible to submit your NOI under criterion C using Appendix E, and answer any corresponding questions.

If criterion D or E is selected, attach copies of any communications between you and the U.S. Fish and Wildlife Service and National Marine Fisheries Service to this NOI.

Section H. Historic Preservation

If the project is not located in Indian country lands, indicate whether the project is located on a property of religious or cultural significance to an Indian tribe, and if so, provide the name of the Indian tribe associated with the property. Use the instructions in Appendix F to complete the questions on the NOI form regarding historic preservation.

Section I. Certification

Certification statement and signature (see Section B.11 of Appendix B of the MSGP for more information). Enter certifier's printed name, title and email address. Sign and date the form. (CAUTION: An unsigned or undated NOI form will prevent the granting of permit coverage.) Federal statutes provide for severe penalties for submitting false information on this application form. Federal regulations require this application to be signed as follows:

For a corporation: by a responsible corporate officer, which 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 Part, 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 the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA). Include the name and title of the person signing the form and the date of signing.

An unsigned or undated NOI form will not be considered eligible for permit coverage.

Modifying Your NOI

If you have been granted a waiver from your Regional Office from electronic reporting, and if after submitting your NOI you need to correct or update any fields on this NOI form, you may do so by indicating changes on this same form.

Paperwork Reduction Act Notice

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2040-0300). Responses to this collection of information are mandatory (40 CFR 122.26). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 4.1 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Submitting Your Form

If you have been granted a waiver from your Regional Office to submit a paper NOI form, you must send your NOI by mail to one of the following addresses:

For Regular U.S. Mail Delivery:
Stormwater Notice Processing Center
Mail Code 4203M, ATTN: 2021 MSGP Reports
U.S. EPA
1200 Pennsylvania Avenue, NW
Washington, DC 20460

For Overnight/Express Mail Delivery:
Stormwater Notice Processing Center
William Jefferson Clinton East Building - Room 7420
ATTN: 2021 MSGP Reports
U.S. EPA
1201 Constitution Avenue, NW
Washington, DC 20004

Visit this website for instructions on how to submit electronically:
http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI- System-for-EPAs-MultiSector-General-Permit.cfm