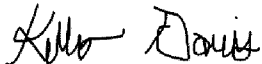


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Enforcement and Compliance Assurance Division
Water Compliance Branch

Clean Water Act (CWA) Inspection Report

Program: Industrial Stormwater	Inspection Type: Compliance Evaluation Inspection (CEI)	
Permittee Name: Culpeper Wood Preservers	NPDES/ICIS No.: MAR05J04L	
Inspection Entry Date: November 2, 2022 Inspection Entry Time: 8:15 AM	Inspection Exit Date: November 2, 2022 Inspection Exit Time: 11:30 AM	
Facility Inspected: Culpeper Wood Preservers 840 Sterling Road, Lancaster, MA 01561	Lat, Long: 42.43867°, -71.71269° NAICS / SIC Code: 2491 – Wood Preserving	
EPA Region 1 Representative(s): Abraham Elmir – EPA Region 1 Life Scientist/Lead Inspector, (617) 918-1583, elmir.abraham@epa.gov		
State Representative(s): None		
On-site Facility Representative(s): Mike Nuzzolilo, General Manager, (978) 368-7667, mnuzzolilo@culpeperwood.com		
Responsible Official: Mike Nuzzolilo, General Manager		
Name and Signature of Lead Inspector Kelly Davis 	Agency/Office/Phone Number Eastern Research Group (ERG) (703) 633-1646 kelly.davis@erg.com	Date 12/20/2022

INTRODUCTION:

On November 2, 2022, staff from U.S. Environmental Protection Agency (EPA) Region 1 and an EPA contractor from ERG (EPA Inspection Team) conducted an industrial stormwater Compliance Evaluation Inspection (CEI) at Culpeper Wood Preservers located at 840 Sterling Road, Lancaster, Massachusetts (hereinafter, the Facility). On May 28, 2021, the Facility submitted a Notice of Intent (NOI) to obtain coverage under the 2021 MSGP, MAR050000, which became effective on September 29, 2021, and expires on February 28, 2026. The Facility falls under Sector A – Timber Products, Subsector A2. As part of Subsector A2 permit requirements, the Facility is subject to benchmark monitoring of total recoverable arsenic and copper.

Ms. Kelly Davis (ERG, Lead Inspector) presented her Clean Water Act (CWA) inspector credential to the Facility representative, Mr. Mike Nuzzolilo, and conducted an opening conference. During the opening conference, the Lead Inspector explained the purpose of the CEI was to assess the Facility's compliance status with respect to EPA's 2021 Industrial Stormwater Multi-Sector General Permit (MSGP).

The weather at the time of the inspection was sunny and approximately 50°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA), the closest precipitation monitoring station in the town of Berlin received approximately 0.06 inches of rainfall the day before the inspection.

FINDINGS AND OBSERVATIONS:

Facility Description

The Facility, owned by Culpeper Wood Preservers, is a wood treating plant that includes the treatment and preservation of raw lumber and the storage of both untreated and treated lumber. The Facility treats approximately 41 million board-feet of raw lumber yearly using products such as Micronized Copper (MCA), “Ecolife”, and Alkaline Copper Quaternary.

The Facility comprises 18 acres located off Sterling Road in Lancaster, Massachusetts. The Facility is bordered by another commercial lot to the west, Sterling Street to the north, and forested land to the east and south. The Facility contains a treated wood staging area in the north (refer to [Appendix A, Photographs 1 and 2](#)); a treatment plant and drip pad in the mid-west area (refer to [Appendix A, Photographs 3, 4, and 7 through 11](#)); an office building, garage, and a kiln in the mid-east area (refer to [Appendix A, Photographs 5, 6, and 12](#)); and a raw wood staging area in the mid-west and south areas (refer to [Appendix A, Photographs 7, 10, 12 and 15](#)). The Facility’s outdoor industrial activities included the following:

- Northern portion – outdoor staging area for treated lumber
- Southern and mid-west portion – outdoor staging area for raw lumber

Facility Drainage Systems and Discharges

The Facility representative stated that the Facility has four outfalls (Outfall 001 through 004) and one catch basin onsite.

- Stormwater from the northeast area of the Facility flows to Outfall 001, located at the mid-east perimeter (refer to [Appendix A, Photograph 5](#)).
- Stormwater from the northwest area of the Facility is conveyed southwest along the west perimeter via channelized flow in a trench. The trench connects with Outfall 003 located at the mid-south area of the Facility (refer to [Appendix A, Photographs 14 through 16 and 22](#)). The Facility representative did not know where Outfall 003 discharged (i.e., to a water of the U.S., to a Municipal Separate Storm Sewer System [MS4], or elsewhere). The Facility’s SWPPP (March 30, 2022) on page 3-7 states that “any excess runoff flows into nearby outfalls, numbered 1-4, then into Goodridge Brook, and eventually to the Nashua River.” The Facility representative stated the benchmark monitoring samples are taken upgradient of Outfall 003 (refer to [Appendix A, Photograph 14](#)).
- The SWPPP identifies another outfall, Outfall 004, that the Facility representative stated does not receive stormwater flow (refer to [Appendix A, Photograph 17](#)). Instead of discharging through Outfall 004, stormwater infiltrates into the ground along the mid-west perimeter.
- Stormwater from the south area of the Facility flows either to a catch basin located in the south area of the Facility or to Outfall 002 located at the south perimeter (refer to [Appendix A, Photographs 18 through 21](#)). The Facility representative did not know to where the catch basin discharges. The Facility representative stated Goodridge Brook is located south of Outfall 002, following south along a swale created by the raised railroad tracks.

The town of Lancaster maintains a Phase II NPDES MS4 permit.

Sampling and Records

At the time of the inspection, the EPA Inspection Team reviewed the following records provided onsite:

- a. Stormwater Pollution Prevention Plan (SWPPP) dated March 30, 2019 (not signed) (refer to Appendix B, Exhibit 1)
- b. Monthly Facility Inspection Reports – One monthly from January 27, 2021 through October 24, 2022
- c. Quarterly Visual Assessment Forms – first quarter 2021 through fourth quarter 2022
- d. Coordination with Irwin Engineers about steps to address an AIM triggering event (September 16, 2021) (refer to Appendix B, Exhibit 2)
- e. Coordination with GZA GeoEnvironmental about redesigning the site drainage (August 18, 2022) (refer to Appendix B, Exhibit 3)
- f. A site map (refer to Appendix B, Exhibit 4)

On November 7, 2022, the EPA Inspection Team requested, and on November 22, 2022 received, the following records from the Facility representative:

- a. SWPPP dated March 30, 2022 (signed) (refer to Appendix B, Exhibit 5)
- b. Annual compliance evaluation reports (May 5, 2020; May 18, 2021; April 12, 2022)

Observations

The Facility representative stated the Facility receives raw lumber via railcar at the southwest perimeter. The EPA Inspection Team observed staged raw lumber in the south area and mid-west area of the Facility. Raw lumber is dried in the kiln and/or chemically treated in the treatment plant inside which treatment chemicals are stored (refer to Appendix A, Photographs 7, 10, 12, and 15). Chemically treated wood dries on a covered and contained drip pad adjacent to the treatment plant for approximately 24 to 48 hours before it is moved to the north concrete staging area for outside storage (refer to Appendix A, Photograph 1 through 4, 7, and 10). Lumber is visually assessed for dryness before it is placed in the outdoor staging area. The treated lumber sits for approximately 24 to 48 hours before it is shipped to Lowes Home Improvement facilities. The Facility representatives stated treated wood is not hosed down.

The Facility owns approximately 17 forklifts, a front-end loader, and a bobcat. This equipment is stored outdoors when not in use. The equipment is fueled from a 500-gallon diesel aboveground storage tank (AST). The EPA Inspection Team observed the AST inside the treatment plant, along the south wall (refer to Appendix A, Photographs 8 and 9). The EPA Inspection Team observed a spill kit inside the treatment plant (refer to Appendix A, Photograph 11). The EPA Inspection Team observed that the area outside the fueling area where vehicles pull up to the AST for fueling is graded down towards the fueling area.

Routine vehicle maintenance, including replacement of fluids and battery replacement, occurs inside the garage. Non-routine maintenance is performed in the garage onsite by outside contractors. Batteries and used oil are stored inside the garage and the Facility representative stated the garage does not have internal floor drains. The Facility representative stated used oil is picked up and removed by a contractor, Safety-Kleen Systems, and oil filters are crushed and recycled. The EPA Inspection Team observed a 250-gallon diesel AST located against the garage's east wall and a 500-gallon diesel AST south of the kiln (refer to Appendix A, Photographs 6 and 13). The AST's were covered and within secondary containment.

CLOSING:

At the conclusion of the inspection, the EPA Inspection Team held a closing conference with the Facility representatives and discussed the following preliminary findings and observations of the inspection. The closing conference began at 11:15 AM (EST) and concluded at approximately 11:30 AM (EST).

POTENTIAL NONCOMPLIANCE ITEMS:

1. Permit Part 6.2.7 states, “You must sign and date your SWPPP in accordance with Appendix A, Subsection 11.”

At the time of the inspection, the Lead Inspector identified that the onsite 2019 SWPPP had not been signed (refer to Appendix B, Exhibit 1). The Facility emailed the 2022 SWPPP to the Lead Inspector on November 11, 2022 that was certified by Mr. Mike Nuzzolilo on April 8, 2022 (refer to Appendix B, Exhibit 5).

2. Permit Part 6.5 states, “You are required to keep the following inspection, monitoring, and certification records with your SWPPP that together keep your records complete and up-to-date, and demonstrate your full compliance with the conditions of this permit:
6.5.1 A copy of the NOI submitted to EPA along with any correspondence exchanged between you and EPA specific to coverage under this permit;
6.5.2 A copy of the authorization email you receive from the EPA assigning your NPDES ID;
6.5.3 A copy of this permit (either a hard copy or an electronic copy easily available to SWPPP personnel)”

The EPA Inspection Team observed that the onsite SWPPP did not include a copy of the NOI, the authorization email, or a copy of the permit. The 2022 SWPPP also did not include these documents.

3. Permit Part 6.2.2.3 states the permittee must, “Provide a map showing:
a. Boundaries of the property and the size of the property in acres...
c. Directions of stormwater flow (use arrows), including flows with a significant potential to cause soil erosion...
g. Locations of potential pollutant sources identified under Part 6.2.3.2...
i. Locations of all stormwater monitoring points;
j. Locations of stormwater inlets and discharge points, with a unique identification code for each discharge point (e.g., 001, 002), indicating if you are treating one or more discharge points as “substantially identical” under Parts 3.2.4.5, 6.2.5.3, and 4.1.1, and an approximate outline of the areas draining to each discharge point;
k. If applicable, municipal separate storm sewer systems (MS4s) and where your stormwater discharges to them...
m. Locations of the following activities where such activities are exposed to precipitation:
i. fueling stations;
ii. vehicle and equipment maintenance and/or cleaning areas;
iii. loading/unloading areas;
iv. locations used for the treatment, storage, or disposal of wastes;
v. liquid storage tanks;
vi. processing and storage areas;

- vii. immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
- viii. transfer areas for substances in bulk;
- ix. machinery”

The Lead Inspector observed that the onsite map from the 2019 SWPPP did not include the size of the property in acres, directions of stormwater flow, or locations of potential pollutant sources such as locations of AST tanks (refer to Appendix B, Exhibit 4). The map also did not include locations of stormwater monitoring points and the outdoor portion of the fueling station at the treatment plant. The Facility representative stated that the location depicted on the map of Outfall 001 was inaccurate, and that it actually was located at the mid-east perimeter (refer to Appendix A, Photograph 5). The Facility representative also stated that the location depicted on the map of Outfall 002 was inaccurate and that it actually was located at the southern-most point of the Facility (refer to Appendix A, Photographs 20 and 21).

The site map provided after the inspection with the 2022 SWPPP is the same as the 2019 SWPPP map with the exceptions that the 2022 SWPPP map does identify the size of the property in acres and the locations of AST tanks (refer to Appendix B, Exhibit 5).

4. Permit Part 3.2.1 states, “Once each quarter for your entire permit coverage, you must collect a stormwater sample from each discharge point ... and conduct a visual assessment of each of these samples.”

The Facility’s NOI certified on May 28, 2021 stated that the Facility has four outfalls (Outfalls 001, 002, 003, and 004). The Facility did not consistently conduct visual outfall assessments from second quarter of 2021 through the fourth quarter 2022 as shown in Table 1.

Table 1: Quarters When Visual Assessments Were Performed at Outfalls 001-004 from Quarter 2, 2021 Through Quarter 4, 2022

	Outfall 001	Outfall 002	Outfall 003	Outfall 004
Quarter 2, 2021	Missing	Missing	Performed	Missing
Quarter 3, 2021	Missing	Performed	Missing	Missing
Quarter 4, 2021	Missing	Missing*	Performed	Missing
Quarter 1, 2022	Performed	Missing*	Missing*	Missing
Quarter 2, 2022	Performed	Missing*	Missing*	Missing
Quarter 3, 2022	Performed	Missing*	Missing*	Missing
Quarter 4, 2022	Performed	Missing	Missing	Missing

*= Visual assessments were not performed although sampling results were sent to Net-DMR.

The Facility representative stated that visual assessments were not performed during missing quarters because they did not receive flow during that quarter, however the Facility collected and submitted benchmark monitoring samples to Net-DMR (see Potential Noncompliance Item #5) without completing visual assessments seven (7) times (starred in Table 1).

5. Permit Part 5.2.2 states, “If an annual average exceeds an applicable benchmark threshold based on the following events, the AIM [Addition Implementation Measures] requirements have been triggered for that benchmark parameter. You must follow the corresponding AIM-level responses and deadlines described in

Parts 5.2.3, 5.2.4, and 5.2.5 unless you qualify for an exception under Part 5.2.6. An annual average exceedance for a parameter can occur if:

- 5.2.2.1 The four-quarterly annual average for a parameter exceeds the benchmark threshold, or
- 5.2.2.2 Fewer than four quarterly samples are collected, but a single sample or the sum of any sample results within the sampling year exceeds the benchmark threshold by more than four times for a parameter. This result indicates an exceedance is mathematically certain (i.e., the sum of quarterly sample results to date is already more than four times the benchmark threshold)."

Permit Part 5.2.3.1 states, "If any modifications to or additional control measures are necessary in response to AIM Level 1, you must implement those modifications or control measures within 14 days of receipt of laboratory results, unless doing so within 14 days is infeasible. If doing so within 14 days is infeasible, you must document per Part 5.3 why it is infeasible and implement such modifications within 45 days."

The Facility reported the following benchmark exceedances of copper from July 1, 2021 to June 30, 2022 as shown in Table 2. The Facility's arsenic levels did not exceed the benchmark concentration.

Table 2: Total Recoverable Copper Benchmark Exceedances (µg/L) from Quarter 3, 2021 through Quarter 3, 2022

Quarter	Limit	Four Times Parameter	Outfall 001	Outfall 002	Outfall 003	Outfall 004
Quarter 3, 2021	5.19	20.8	N/A*	Not Received	Not Received	N/A*
Quarter 4, 2021	5.19	20.8	Not Received	85.7	91	Not Received
Quarter 1, 2022	5.19	20.8	5380	2300	2330	N/A*
Quarter 2, 2022	5.19	20.8	1430	1370	1420	N/A*
Quarter 3, 2022	5.19	20.8	3790	659	892	N/A*

N/A* = Outfall did not have measurable flow during the quarter.

All measured total recoverable copper events trigger AIM action levels because each sample exceeds four times the parameter limit of 5.19 µg/L such that an exceedance of the benchmark is mathematically certain for four quarters of sampling. The Facility representative stated that to address copper exceedances, the Facility has multiple plans, including coordinating with both Irwin Engineer and GZA GeoEnvironmental, Inc. on site redesign projects (refer to [Appendix B, Exhibits 2 and 3](#)).

- The Facility is planning to repave the site with asphalt. The Facility representative stated that the surface of the Facility is contaminated with arsenic and copper due to the Facility's previous use of treatment materials that contained those elements (before the current permit term). The Facility representative stated the asphalt would cap the chemicals and prevent their contaminating stormwater runoff. The Facility representative estimated that the project will be complete in the spring of 2023.
- The Facility contracted GZA GeoEnvironmental, Inc. to redesign Facility stormwater drainage towards treatment methods before reaching Outfalls 001, 002, and 003. This includes performing maintenance on the stormwater trench along the west perimeter of the Facility to direct channelized flow towards rip rap before reaching Outfall 003. The Facility representative stated the area that drains to Outfall 002 is also being redesigned, but that plans had not been finalized. The Facility representative stated that designs were not finalized but that construction would start approximately in 2023.

- The Facility contracted Irwin Engineers to perform an evaluation of the Facility's current outfall conditions and associated control measures. Irwin Engineers also plans to take samples from the outfalls and Goodridge Brook and review options to achieve AIM compliance.

The Facility's 2021 Annual Report stated the Facility was in AIM Level 2 (refer to [Appendix B, Exhibit 6](#)). The Annual Report also stated the Facility would install filter units near Outfall 003, regrade the area to prevent stormwater flow from bypassing the structural control, and begin construction by spring 2022. At the time of the inspection, the Facility had not begun any of the planned actions.

6. Permit Part 7.3.4 states, "...for any of your monitored discharge points that did not have a discharge within the reporting period, using Net-DMR, you must report that no discharges occurred for that discharge point no later than 30 days after the end of the reporting period."

The Facility did not submit sample results for Outfall 002 and Outfall 003 during the third quarter of 2021 and Outfall 001 and Outfall 004 during the fourth quarter of 2021. The Facility failed to state if the outfalls did not receive measurable flow.

7. Permit Part 2.1.2.8.b states, "Personnel must be trained in at least the following if related to the scope of their job duties (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections):
- i. An overview of what is in the SWPPP;
 - ii. Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
 - iii. The location of all the controls required by this permit, and how they are to be maintained;
 - iv. The proper procedures to follow with respect to the permit's pollution prevention requirements; and
 - v. When and how to conduct inspections, record applicable findings, and take corrective actions; and
 - vi. The facility's emergency procedures, if applicable per Part 2.1.1.8."

Page 2-6 of the Facility's SWPPP (both the onsite 2019 SWPPP and the 2022 SWPPP) states, "Employees at the Culpeper facility are trained in the following areas, at least once per year:

- Preventative measures, including spill prevention and responses, facility inspections and preventative maintenance. (All personnel)
- The facility's SWPPP. (Conner Burke, Mike Nuzzolilo and Mark Plouffe)
- Features and operations of the facility that are designed to minimize discharges of Section 313 water priority chemicals, particularly spill prevention procedures. (All personnel)
- Annual Hazardous Waste Training. (All personnel)"

The Facility representative stated that regular stormwater training is not performed, although he leads quarterly trainings that cover general safety and pollution prevention. The attendance of the training is not tracked, and the topics do not cover stormwater-related material.

AREAS OF CONCERN:

- The Facility representative stated benchmark monitoring samples are taken upgradient of Outfall 003 (refer to [Appendix A, Photograph 14](#)). Rip rap, sediment, and leaves are located in between the sampling location and Outfall 003.

- The Facility representative stated stormwater from the south area of the Facility flows either to a catch basin located in the south area of the Facility or to Outfall 002 located at the south perimeter (refer to Appendix A, Photographs 18 through 21). The Facility representative did not know where the catch basin discharged.

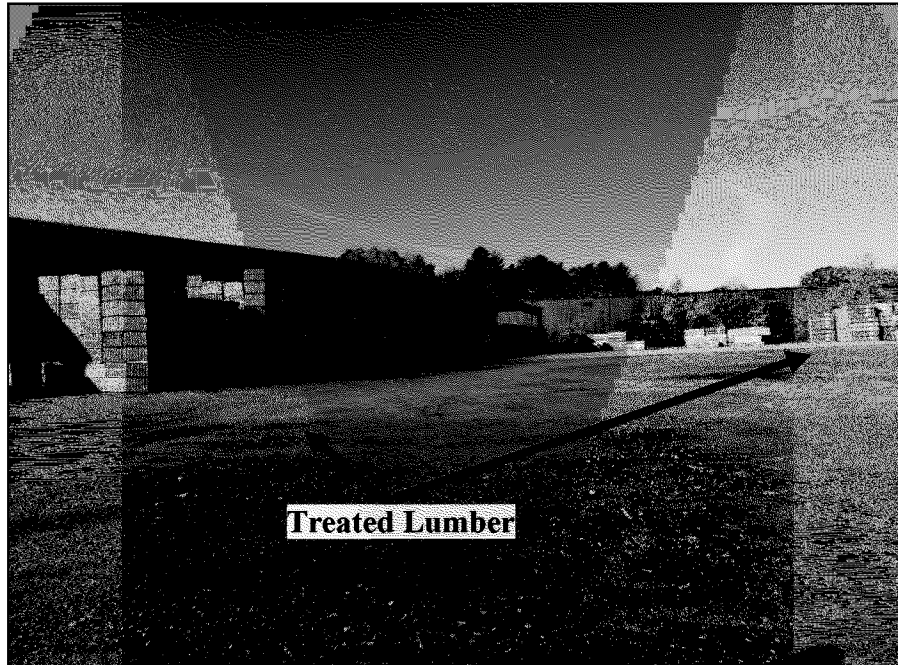
ATTACHMENTS:

Appendix A – Photograph Log

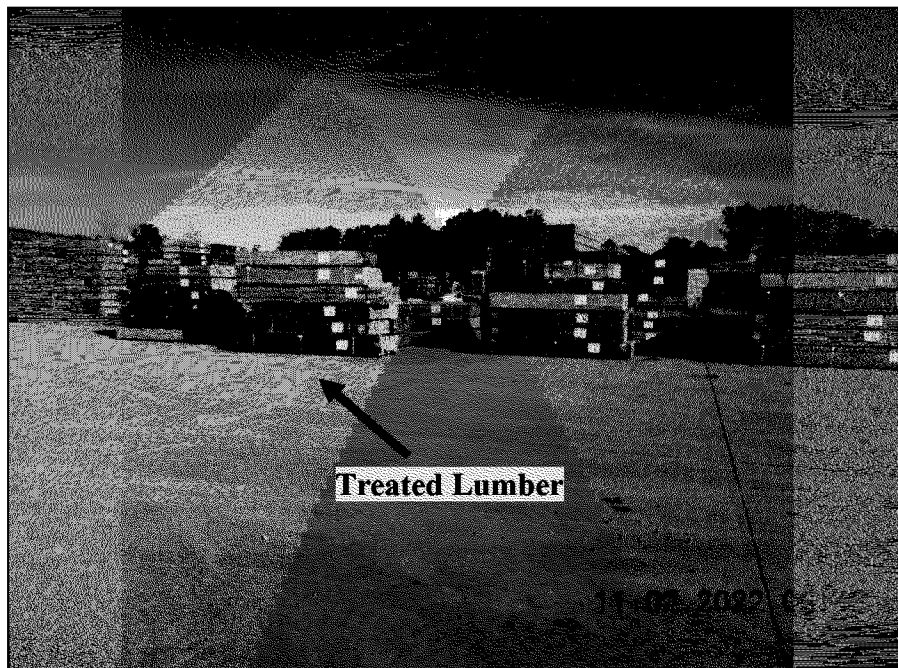
Appendix B – Exhibit Log

Appendix A

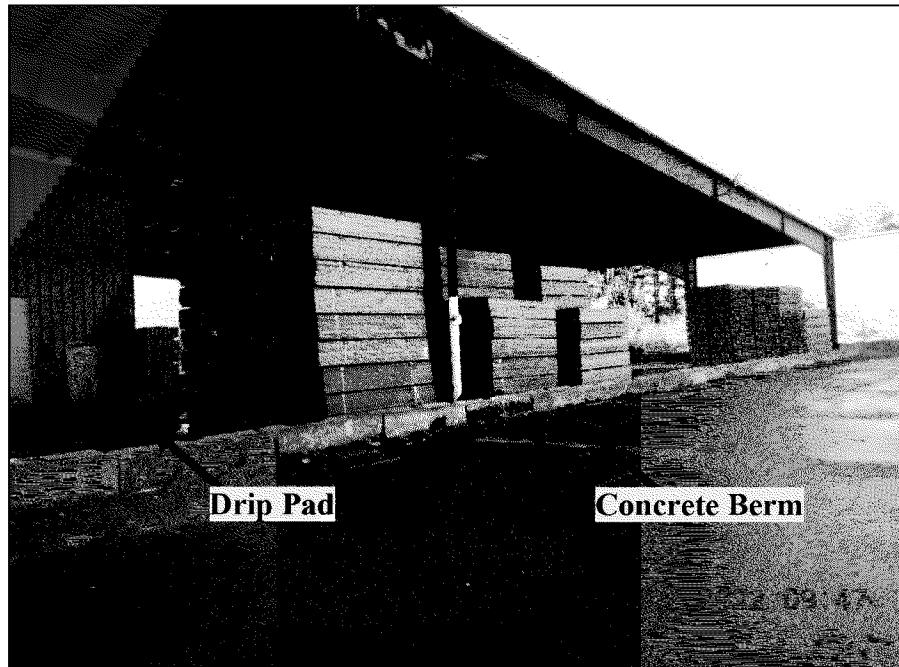
Photograph Log



Photograph 1. View, facing west, of the north staging area where treated lumber is stored.



Photograph 2. View, facing north, of treated lumber in the Facility's north staging area.



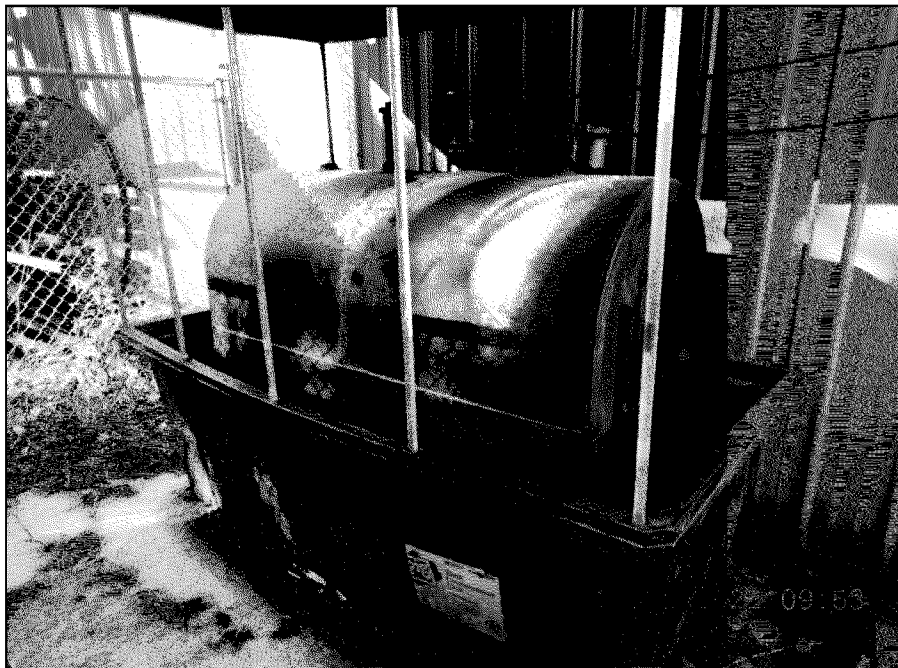
Photograph 3. View, facing southwest, of the drip pad on the north side of the treatment plant where treated lumber dries before it is moved to the north staging area. The drip pad is contained by concrete berms and is slanted inward towards floor drains.



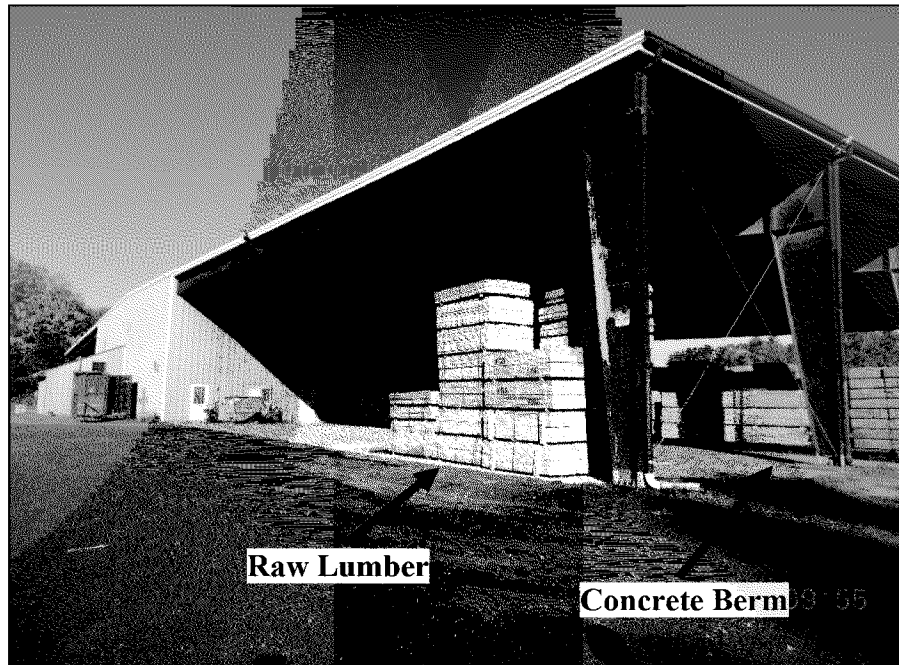
Photograph 4. View, facing west, of the drip pad on the east side of the treatment plant, circled in red, where treated lumber dries before it is moved in the north staging area.



Photograph 5. View, facing north, of Outfall 001. The EPA Inspection Team did not observe flow from Outfall 001 at the time of the inspection.



Photograph 6. View, facing west, of a 250-gallon diesel aboveground storage tank (AST). The tank was contained under a roof and within secondary containment.



Photograph 7. View, facing northwest, of a raw lumber staging area. A concrete berm separates the drip pad and the raw lumber staging area.



Photograph 8. View of a 500-gallon diesel AST inside the treatment plant's fueling location adjacent to the Facility's south wall. This AST was under cover and within secondary containment.



Photograph 9. View, facing northeast, of the vehicle fueling area at the treatment plant's south wall. The Facility representative stated vehicles back up to the garage door where they are fueled from the AST shown in Photograph 8.



Photograph 10. View, facing northwest, of the drip pad outside the southwest corner of the treatment plant. Raw lumber is stored on the drip pad but not under the roof.



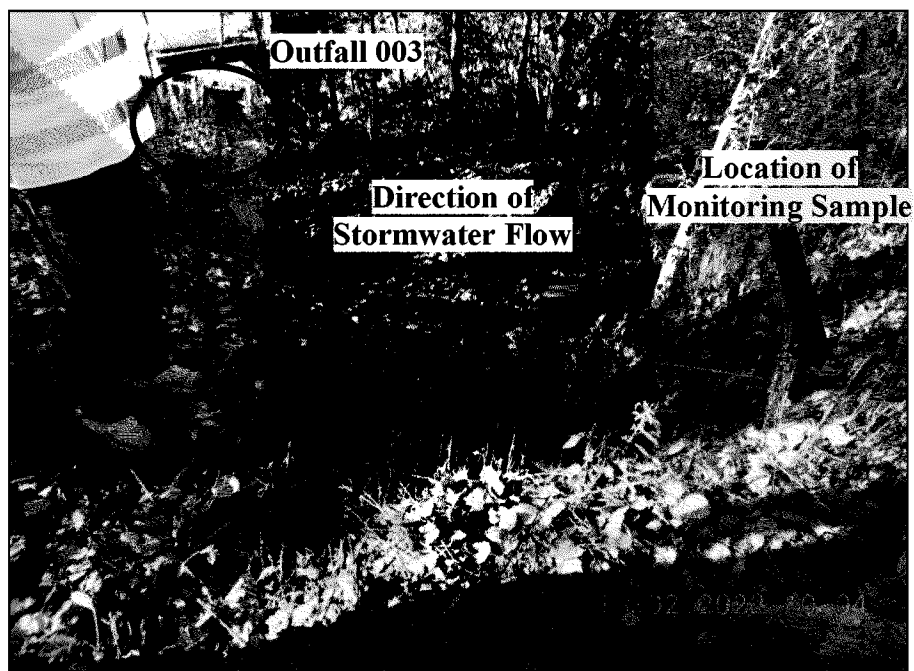
Photograph 11. View of a spill kit inside the treatment plant.



Photograph 12. View, facing south, of the paved south staging area. Raw wood was stored in the south area. The pavement was wet from stormwater.



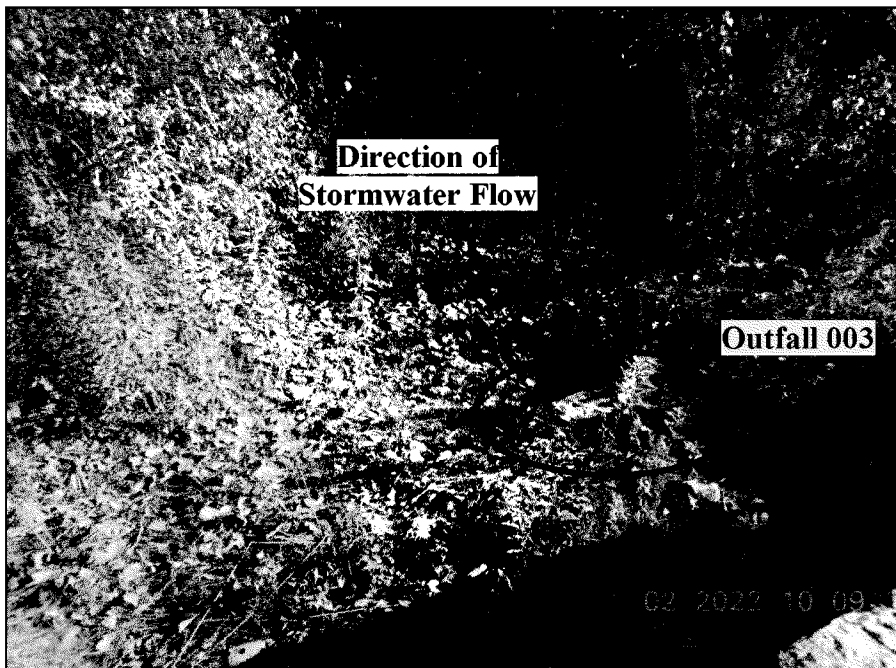
Photograph 13. View, facing east, of a 500-gallon diesel AST south of the kiln. This AST was stored under cover and within secondary containment.



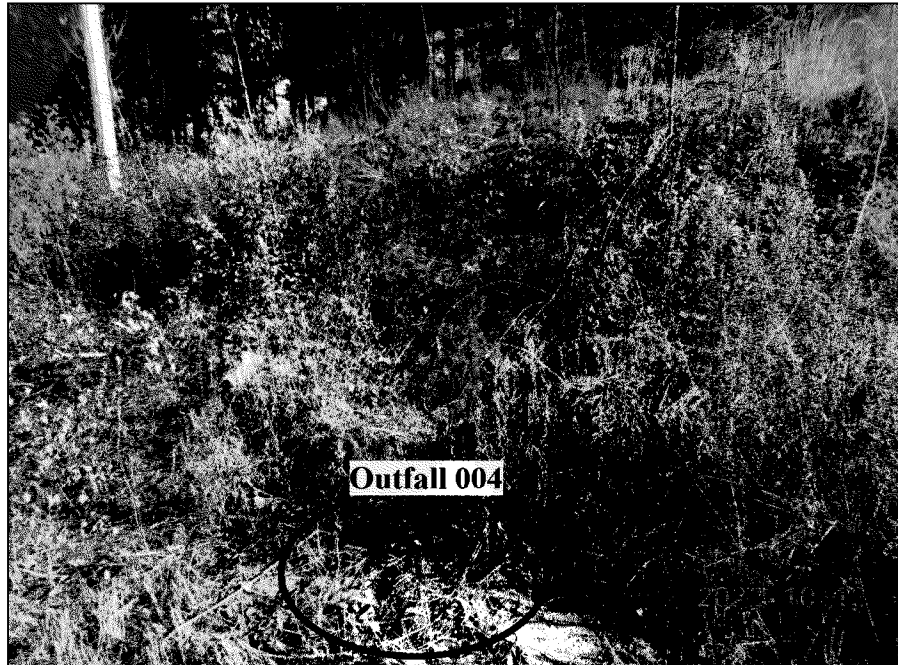
Photograph 14. View, facing south, upgradient of Outfall 003. The Facility representative stated stormwater flows from the point where the image was taken to the outfall. The Facility representative stated they take samples upgradient of Outfall 003.



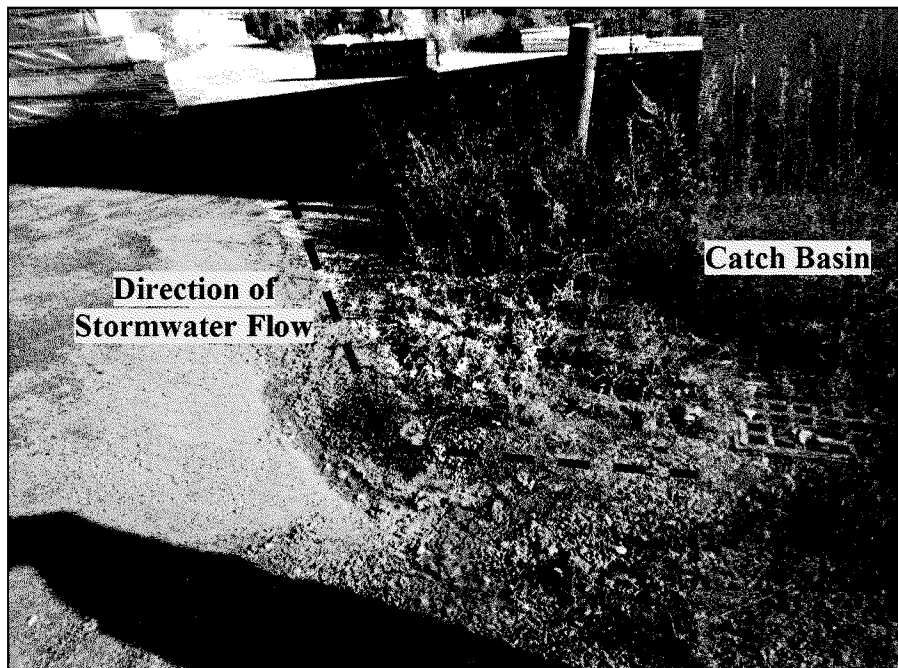
Photograph 15. View, facing north, of the drainage area to Outfall 003.



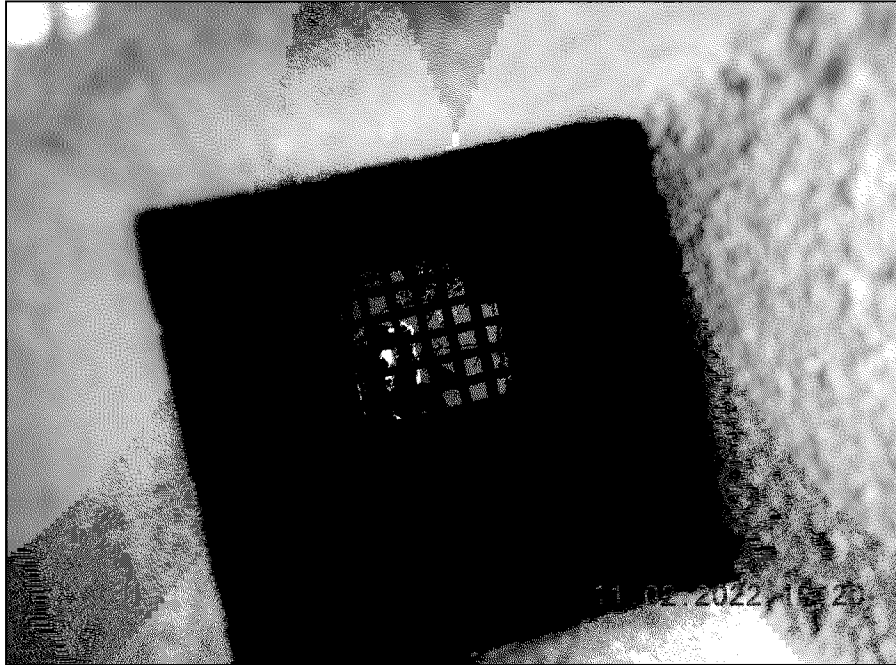
Photograph 16. View, facing northeast, of concrete outlet structure at Outfall 003. The EPA Inspection Team did not observe flow to Outfall 003 at the time of the inspection. The Facility representative did not know where the outfall discharged.



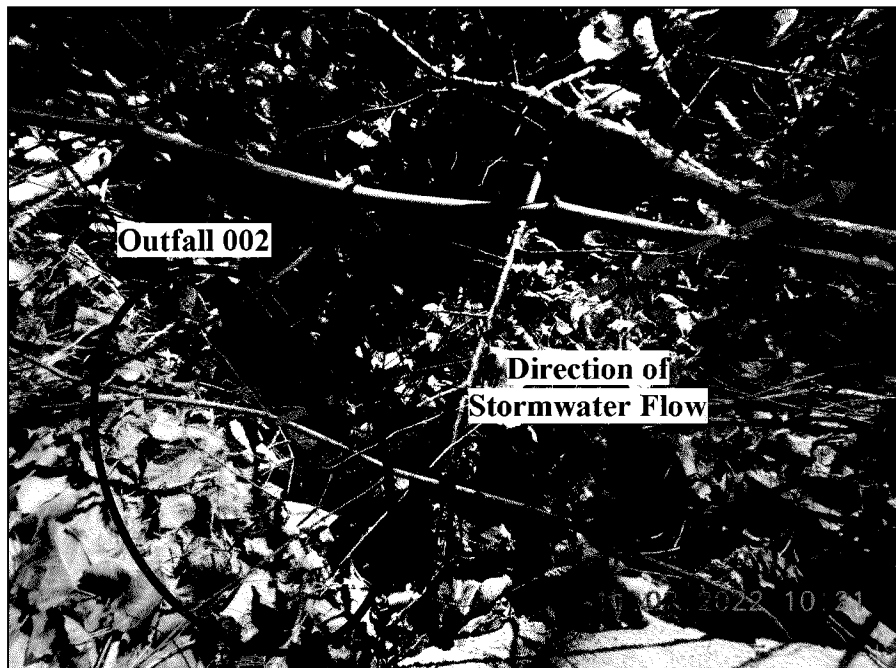
Photograph 17. View, facing east, of Outfall 004. The EPA Inspection Team did not observe flow from the outfall at the time of the inspection.



Photograph 18. View, facing east, of a catch basin in the south area of the Facility. The Facility representative was not aware where the catch basin discharged.



Photograph 19. View inside the catch basin shown in Photograph 20.



Photograph 20. View, facing south, of Outfall 002. The EPA Inspection Team did not observe flow at the outfall at the time of the inspection.



Photograph 21. View, facing north, of Outfall 002.



Photograph 22. View, facing northwest, of the trench along the west perimeter. The Facility representative stated stormwater flows along the trench to Outfall 003. The EPA Inspection Team observed sediment in the trench.

Attachment B
Exhibit Log

Exhibit 1

Onsite Stormwater Pollution Prevention Plan
(SWPPP) – March 30, 2019

STORMWATER POLLUTION PREVENTION PLAN

CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

SWPPP CERTIFICATION

Name:

Mr. Mike Nuzzolillo

Title:

Operations Manager / S. Lancaster Facility

Wood Preserving Facility Name:

Culpeper of New England, LLC

840 Sterling Road

S. Lancaster, Massachusetts

"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 gather and evaluate the information submitted. Based on my knowledge 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."

Signature:

Title:

Operations Manager / S. Lancaster Facility

Date:

McPherson Design Group, p.c.
2-4

11/02/2022 09:20

Exhibit 2
Coordination with Irwin Engineers – September 16,
2021

33 West Central Street
Natick, MA 01760-4503

Mr. Mike Nuzzolo
Guipeper Wood Preservers
840 Sterling Road
Lancaster, MA 01561

Re: MSGP Additional Implementation Measures

In response to your request, Irwin Engineering has submitted a proposal to Culpeper Wood Preservers (CWP) for the environmental matters at 840 Sterling Road in Culpeper, Virginia.

Culpeper Wood Preservers' facility in Lancaster, PA, produces construction lumber. The Facility is covered under a DMSGP for industrial stormwater discharge.

As required by the permit the Facility collected samples for the third quarter of 2021 and the sampling results are applicable MSQP benchmarks, such that an event is not certain for four quarters of sampling. This is due to the implementation Measures (AIM) Level 1 for the Facility. The Facility is awaiting a qualifying discharge to collect a new set of historical sampling results the copper concentration for AIM Level 1 as well. Facilities subject to the permit are required to design, install, and implement the measures that are necessary, and modifications are necessary, and the Facility is expected to reduce the copper concentration. The Facility has arranged for maintenance of the storm drain that the suspended form that would be required to be replaced require an alternate control measure.

You have also asked whether the Facility may be eligible for one of the exceptions from AIM that are available under the MSGP. As part of this scope of work we propose to conduct sampling at the Facility during a storm event to prepare an initial evaluation of the Facility's potential for eligibility under one or more of the following exceptions:

- Benchmark exceedance that does not result in an exceedance of water quality standards in the receiving water (Goodridge Brook)
- Benchmark exceedance for copper that does not result in the exceeding water in-stream copper concentrations above a facility-specific threshold estimated using EPA's Biotic Ligand Model
- Benchmark exceedance attributable to run-on flow associated with a storm. The Facility is located across the street from a wire and cable manufacturing facility. Run-on from that plant has reportedly been observed discharging into Goodridge Brook.

Once a compliance option for AIM is selected, the Facility's Stormwater Management Plan (SWPPP) will need to be updated to reflect the chosen option. Updates to the Facility's SWPPP will be performed as part of the project. The Facility has undertaken a construction project in August 2021, which involved the construction of an office building on the east side of the Site, and the SWPPP will be updated concurrently with the AIM implementation.

SCOPE OF SERVICES

Task 1 Site Visit

IRWIN will visit the Site to observe the existing stormwater management practices at each outfall and associated control measures. The visit will include a walk-through of the Site on Goodridge Brook for later sample collection. The visit will last for approximately two hours.

Task 2 Stormwater and Receiving Water Sampling

IRWIN will visit the Facility during a storm event to collect stormwater samples from Goodridge Brook, 002, 003, and 004. Assuming access is available, IRWIN will also collect stormwater samples from Goodridge Brook upstream and downstream of the Facility. Stormwater temperature and pH will be measured in the field and samples will be collected for laboratory analysis for total and dissolved copper, total and dissolved organic carbon, ammonia, nitrate, nitrite, sodium, potassium, sulfate, chloride, alkalinity, and hardness. If run-on flow is observed from the property across the street a sample of the run-on will be collected for total and dissolved copper analysis.

Culpeper Wood Preservers
September 16, 2021
Page 1

Task 3 Advice on AIM Compliance Options

IRWIN will prepare a memo summarizing the results of the water quality monitoring and the options for Additional Implementation Measures (AIM) based on the following:

- Comparison of the concentrations of PCBs, PAHs, and other contaminants with EPA's water quality standards and whether further action may be needed.
- Comparison of the upstream and downstream water quality data to EPA's water quality standards and whether further action may be needed.
- Results of EPA's Biotic Ligand Model (BLM) and whether further seasonal sampling is warranted.
- Whether run-on from the adjacent waste water treatment plant is a measurable contribution to the amount of stormwater.

COST AND SCHEDULE

Irwin Engineers proposes to complete the Scope of Work within the estimated budget. Progress invoices will be issued based upon completion of the work.

Should additional work be required beyond the Scope of Work, Irwin Engineers will contact you to discuss the change. Subsequent to your approval, Irwin Engineers will bill you for additional labor at the hourly rate.

Irwin Engineers is prepared to initiate work on the project. The start date will be scheduled for a mutually convenient time. Stormwater sampling will be scheduled at each of the four outfalls.

The estimated budgets and schedules contained herein are based upon acceptance of a signed acceptance within thirty (30) days. After that time, the budget and schedule may be subject to change.

Please do not hesitate to call should you have any questions or require clarification on any part of this proposal. If you choose to accept this proposal and initiate our services, please have an authorized individual sign below and return a copy to us.

IRWIN Engineers
GENERAL & ENVIRONMENTAL

10121 101st Avenue, Suite 100, Richmond, BC V6V 1K1

Exhibit 3

**Coordination with GSA GeoEnvironmental – August
18, 2022**

From: Melissa Kenerson <melissa.kenerson@gza.com>
Sent: Thursday, August 11, 2022 2:13 PM
To: Nuzzolo, Michael <michael.nuzzolo@bjsperwood.com>
Subject: Site visit to review stormwater discharges

You don't often get email from melissa.kenerson@gza.com. Learn why this is important

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Mike,

I was great to get to meet you by phone call last week and learn a little more about your facility. Thanks so much for sending over the site drainage figure and other plans last week. I was wondering if it would be possible for me to meet you at the facility to take a quick tour and review any other data or plans you may have at the facility related to stormwater sampling, discharge, or permitting. This would help Brian and I get a better handle on the situation and determine the best next steps to address your concern. I had a last minute change to my work and am available tomorrow; or else I could swing by Monday, Wednesday, or Friday of next week. I believe you mentioned last week that you work an early shift, and I am an early riser... so I can be there at whatever time works best for you.

Thanks,

Mel

Melissa Kenerson
Senior Project Manager
GZA | 245 Varnum Street | Lynnwood, MA 02062
o: 781.276.5838 | x: 101.223-5431 | melissa.kenerson@gza.com | www.gza.com
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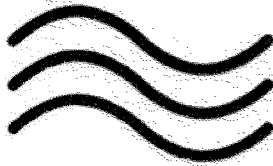
For information about GZA GeoEnvironmental, Inc. and its services, please visit our website at www.gza.com.

11.02.2022 09:17

Exhibit 4

Site Map

Exhibit 5
SWPPP – March 30, 2022



**MCPHERSON
DESIGN
PLLC**

100 BRITTANY LANE

SUFFOLK, VA 23435

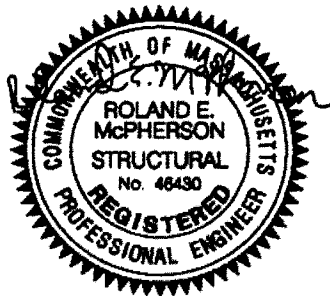
(757) 830-2881

WWW.MCPHERSONDESIGNPLLC.COM

**STORMWATER POLLUTION PREVENTION PLAN
(SWPPP)**

for

**CULPEPER OF NEW ENGLAND, LLC
WOOD TREATING PLANT
SOUTH LANCASTER, MASSACHUSETTS**



SUBMITTED TO:

Culpeper of New England, LLC
840 Sterling Road
South Lancaster, Massachusetts 01561

March 30, 2022

MCPHERSON DESIGN, PLLC
Structural Engineers
Wood Treating Industry Consultants

March 30, 2022

Mr. Mike Nuzzolilo
Culpeper of New England, LLC
840 Sterling Road
Lancaster, Massachusetts 01523

RE: Stormwater Pollution Prevention Plan (SWPPP)
for Culpeper Facility at 840 Sterling Road
S. Lancaster, Massachusetts

Dear Mike,

McPherson Design is pleased to provide the SWPPP document for your use and records. Enclosed is one (1) copy of this document. Please note that a copy of this document must be kept at the site and must be readily available should an EPA or State inspector visit the site.

As you are aware, the SWPPP document requires that certain amounts of recordkeeping be maintained by Culpeper that will become a part of the SWPPP document. Although the recordkeeping required by the SWPPP document in conjunction with the recordkeeping required by the drip pad is a large amount of work, we implore you to keep good records of all required documents so that your facility will be considered to be in total compliance with EPA and State regulations.

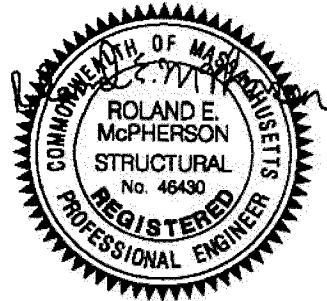
We have enjoyed working with Culpeper on this project. If there are any questions concerning the report or other facets of our involvement, please advise.

Sincerely,

MCPHERSON DESIGN

Roland E. McPherson

Roland E. McPherson, P.E.



**STORMWATER POLLUTION
PREVENTION PLAN
CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

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**STORMWATER POLLUTION
PREVENTION PLAN
CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

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INTRODUCTION

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION I

INTRODUCTION

INTRODUCTION AND PURPOSE

The Environmental Protection Agency (EPA) promulgated stormwater regulations on November 16, 1990. These regulations set forth National Pollutant Discharge Elimination System (NPDES) permit application requirements for stormwater discharges associated with specific industrial activities and stormwater discharges from specific municipal separate storm sewer systems. The regulations presented three permit application options for stormwater discharges associated with industrial activity. The first option was to submit an individual application. The second was to become a participant in a group application, and the third, was to file a notice of intent (NOI) to be covered under a general permit in accordance with the requirements of an issued general permit. All wood preserving facilities, regardless of size, must comply with these regulations. Culpeper submitted for a multi-sector general permit and initially obtained coverage under this permit on June 4, 2015. The multi-sector general permit has been extended to cover March 1, 2021 through February 28, 2026 by way of submitting a Notice of Intent (NOI) on May 28, 2021.

"The Stormwater Pollution Prevention Plan (SWPPP) is considered, by EPA, to be the most important requirement of the NPDES permit", as stated in the press briefing of September 3, 1992, as follows: "A SWPPP shall be developed for each facility covered by this multi-sector general permit. SWPPPs shall be prepared in accordance with good engineering practices. The Plan shall identify potential sources of pollution which may reasonably be expected to affect the quality of stormwater discharges associated with industrial activity from the facility. In addition, the Plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in stormwater discharges associated with industrial activity at the facility and to assure compliance with the terms and conditions of this permit. Facilities must implement the provisions of the SWPPP required under this part as a condition of this permit." Furthermore, the SWPPP must emphasize stormwater Best Management Practices (BMPs) and be designed to comply with Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT). The SWPPP has two major objectives: (1) to identify the source of pollutants that affect the quality of the industrial stormwater discharge; and (2) to describe practices which may be implemented to reduce the pollutants in the industrial stormwater discharge. The SWPPP is a requirement

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION I

INTRODUCTION

of the industrial stormwater discharge permit, whether the latter was obtained as an individual permit, under group auspices, or by way of the NOI path.

ACTIVITIES AT THE FACILITY AND BACKGROUND INFO

BACKGROUND INFORMATION

The drip pad was constructed on this site of approximately eighteen (18) acres in 1989. Various treating chemicals have been used to treat wood since that time. From 1989 to 2003, lumber was treated with Chromated Copper Arsenate (CCA). The EPA declared in March 2003 that wood treated with CCA could not be used for residential purposes after December 30, 2003; therefore, Culpeper switched from CCA to Alkaline Copper Quaternary (ACQ). In 2006, Culpeper switched from ACQ to using Copper Azole (CAC). In 2011, Culpeper changed from CAC to using Micronized Copper (MCA), "Ecolife" and ACQ. Between 2012 and 2017, they used Copper Azole Type C Plus (CAC Plus). In 2018, Culpeper switched from using CAC Plus back to using MCA, along with continuing to use "Ecolife" and ACQ. It is our understanding that the facility did not go through "partial closure" of the drip pad so all materials that come into contact with the drip pad must be handled in accordance with Subpart W requirements and F035 waste.

The activities at the site include bringing in untreated lumber (white lumber) by railway and storing it on site until the white lumber is ready for treatment. The white lumber is then pushed into a pressure vessel (retort or cylinder) and the treating chemicals are added and then pressurized. After this is complete, the treated lumber is removed from the cylinder and allowed to stay on the drip pad until all drippage ceases. The treated lumber is then stored on site or in a building until it is ready to be shipped out, via tractor trailer trucks.

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION I

INTRODUCTION

The treating facility at S. Lancaster is located approximately fifty (50) miles west of Boston. It is about five (5) miles west of Interstate I-495 and fifteen (15) miles north of Interstate I-90. The location can be seen on the Location Map, Appendix A-1.

ACTIVITIES AT THE SITE

The primary activity at this site is the application of a wood preservative to increase the life of untreated wood. White lumber (untreated lumber) is pressure treated in a pressure vessel and then allowed to drip on a concrete drip pad until drippage has ceased. It is then moved to the site or to a building until it is ready to be shipped to a lumber sales facility.

The purpose of this SWPPP document is to comply with Federal Regulation 40 CFR Part 122, which prohibits point source discharges of storm water to United States waters without a NPDES permit. This SWPP Plan is an update to previous SWPP Plans for this site as completed by Industrial Compliance Group, Inc. on November 1, 2015. This SWPPP delineates potential pollution sources, outfalls where storm water leaves the site, and Best Management Practices (BMP's) that are in place to minimize polluted discharges.

PLANNING, ORGANIZATION AND CERTIFICATION

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

POLLUTION PREVENTION PERSONNEL

It is necessary to establish a list of personnel who will be responsible for overseeing and coordinating, and, when necessary, amending the policies, practices, and procedures of the SWPPP. These people should be knowledgeable concerning wood preserving facility operations and capable of understanding the technical aspects of the plan. Trained personnel, responsible for the execution of the SWPPP requirements, should be available at the wood preserving facility.

The SWPPP Committee will be responsible for overseeing the activities as outlined below and shall meet at least annually to address the implementation of these activities:

- Coordination of management in carrying out SWPPP objectives.
- Implementation of spill reporting procedures.
- Employee chemical safety training programs.
- Raw material/waste storage inspection programs.
- Identification of potential pollutant sources.
- Coordination of spill cleanup and containment activities.
- Reviewing the effectiveness of the SWPPP program.
- Updating the SWPPP program to comply with BMP policies and objectives.
- Preparation and submittal of documents described in the Introduction.

STORMWATER POLLUTION PREVENTION PLAN

CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

POLLUTION PREVENTION COMMITTEE MEMBERS

<u>Operations Manager / S. Lancaster Facility:</u>			
Mr. Mike Nuzzolilo			
Phone:	978-273-4007	E-mail:	mnuzzolilo@culpeperwood.com

<u>Designated Individuals:</u>			
Name:	Mark Plouffe	Title:	Plant Manager
Phone:	978-479-5703		

Name:	Javier Rodriguez	Title:	Shop Manager
Phone:	978-368-7667		

**STORMWATER POLLUTION
PREVENTION PLAN
CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

SWPPP CERTIFICATION

The SWPPP certification must be signed in accordance with the provisions of the multi-sector general permit. All reports, certifications, or other information required by the permit or requested by the permit authority shall be signed by a responsible corporate officer, a general partner, a proprietor, or a duly authorized representative.

The duly authorized representative must be authorized in writing by either a corporate officer, a general partner, or a proprietor. A duly authorized representative may be either a named individual or any individual occupying a named position. If an authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization must be attached to the SWPPP prior to submittal of any reports, certifications, or information signed by the authorized representative.

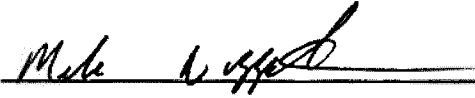
**STORMWATER POLLUTION
PREVENTION PLAN
CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

SWPPP CERTIFICATION

Name:	Mr. Mike Nuzzolilo
Title:	Operations Manager / S. Lancaster Facility
Wood Preserving Facility Name:	Culpeper of New England, LLC
	840 Sterling Road
	S. Lancaster, Massachusetts

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

Signature:	
Title:	Operations Manager / S. Lancaster Facility
Date:	4 - 8 - 22

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

SPECIAL REQUIREMENTS

In addition to the minimum requirements of the "multi-sector" permit, facilities may be subject to additional "special" requirements. Not all facilities will have to include these special requirements in their SWPPP.

SARA Title III, Section 313 Facilities

The following are specific permit requirements for all CCA and copper azole facilities that use more than the threshold level of 10,000 lbs./year of copper (Appendix D of 40 CFR 122, Table 111), because of the reporting requirements under SARA Title III, Section 313 [also known as the Emergency Planning and Community Right-to-Know Act (EPCRA)].

Control measures must be practiced in areas where Section 313 water priority chemicals are stored, handled, processed, or transferred. Culpeper currently implements the following control measures:

- Provide containment, drainage control, and/or diversionary structures.
- Minimize discharges from liquid storage areas (install liquid materials in compatible storage containers and/or provide secondary containment or equivalent measures designed to hold the volume of the largest storage tank plus precipitation).
- Minimize discharges from material storage areas.
- Minimize discharges from loading/unloading areas (use drip pans and/or implement a strong spill contingency and integrity testing plan).
- Minimize discharges from handling/processing/transferring areas (use covers, guards, overhangs, door skirts and/or conduct visual inspections or leak tests for overhead piping).
- Minimize discharges from all the above areas (use manually activated valves with drainage controls in all areas, and/or equip the plant with a drainage system to return spilled material to the facility).

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

- Introduce facility security programs to prevent spills (use fencing, lighting, traffic control, and/or secure equipment and buildings). All chemical storage locations are locked.

Preventative Maintenance

When a leak or spill of a Section 313 water priority chemical has occurred, the contaminated soil, material, or debris must be removed promptly and disposed of in accordance with Federal, State, and local requirements and as described in the Stormwater Pollution Prevention Plan. In order to prevent such spills in the future, these facilities are also required to designate a person responsible for spill prevention, response, and reporting procedures. All areas of the Culpeper facility are currently inspected for the following at appropriate intervals as specified in the plan:

- Leaks or conditions that would lead to discharges of Section 313 water priority chemicals are inspected on a daily basis.
- Conditions that could lead to direct contact of stormwater with raw materials, intermediate materials, waste materials or products.
- Piping, pumps, storage tanks and bins, pressure vessels, process and material handling equipment, and material bulk storage areas for leaks, corrosion, support or foundation failure, or other deterioration or non-containment problems.

Training

Employees at the Culpeper facility are trained in the following areas, at least once per year:

- Preventative measures, including spill prevention and response, facility inspections and preventative maintenance. (All personnel)
- The facility's SWPPP. (Connor Burke, Mike Nuzzolilo and Mark Plouffe)
- Features and operations of the facility that are designed to minimize discharges of Section 313 water priority chemicals, particularly spill prevention procedures. (All personnel)
- Annual Hazardous Waste Training. (All personnel)

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

Engineering Certification

The plan must be reviewed and certified by a Registered Professional Engineer and recertified every 3 years or after the plan is significantly changed. At the end of this SWPP plan is the certification provided by McPherson Design. Recertification will be provided before March 30, 2025. Review for significant changes will occur annually when the drip pad is recertified for Subpart VV.

Monitoring Requirements

Wood preserving plants using copper azole on a CCA contaminated drip pad are required to monitor stormwater discharges as the stormwater leaves the site. Under the multi-sector general permit, Culpeper is required to sample stormwater discharges (outfalls) twice per year of their permit. If samples are above the benchmark established by the EPA, Culpeper must also install BMPs to try and eliminate the high sample readings. There are many other parts to the monitoring requirements that need to be reviewed and understood by Culpeper prior to beginning the monitoring process. These requirements should be reviewed annually by Culpeper and the certifying engineer.

This Culpeper facility has four (4) outfalls where stormwater samples can be taken. The estimated areas for each outfall are shown on the site map (Appendix A-2). In general, stormwater drains from the north end of the property to the south end of the property. Therefore, all of the outfalls are located on the south end of the property. The site drops thirty-seven feet (37'-0") in elevation from the north end to the south end of the property, which provides good, positive drainage. This topographic information was provided by

McPherson Design

**STORMWATER POLLUTION
PREVENTION PLAN
CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION II PLANNING, ORGANIZATION AND CERTIFICATION

Culpeper in a survey developed by Prime Engineering dated August 31, 2018. Most of the site has dirt and gravel which could lead to erosion; however, we did not see any signs of erosion at the outfalls. Due to inclement weather, we were only able to photograph three (3) of the outfalls. See Photograph No. 1 for Outfall #1, Photograph No. 2 for Outfall #3, and Photograph No. 3 for Outfall #4.

POTENTIAL POLLUTANT SOURCES

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION III

POTENTIAL POLLUTANT SOURCES

POTENTIAL POLLUTANT SOURCES

In general, wood preserving facilities are engaged in treating wood, sawed or planed, with chromated copper arsenate (CCA), CCA and Fire Retardant, CCA, ammoniacal copper zinc arsenate (ACZA), copper azole or borates. The S. Lancaster site treats with MCA, "Ecolife" and ACQ. Each facility has been identified as 2491 SIC code. A brief description of the activities associated with the 2491 SIC code is as follows:

SIC 2491 Pressure Treating Wood

Untreated wood is loaded onto small rail or tram cars and moved into the treating cylinder, or retort. The cylinder door is sealed via a pressure tight door, and a vacuum is applied to remove most of the air from the cylinder and the pressure raised to about 150 psi. Total treating time varies depending on the species of wood, the commodity being treated and the desired chemical retention. At the end of the process, the excess treating solution is pumped out of the retort and back to storage for reuse. The cylinder door is opened, and the trams loaded with treated wood are removed from the cylinder onto an impermeable drip pad where they are left to dry, or in some instances are kiln dried. The drying time is dependent on the impregnated material, temperature, humidity, and other parameters. In all cases, the treatment process remains in a closed system.

The types of wood preserving operations are listed below in approximate descending order of concern based on their potential to discharge hazardous materials into stormwater. The ranking considers the quantity of material handled, the potential for discharge and the toxicity or hazard of the materials involved.

- Bulk Chemical and Fuel Storage or Transfer Areas
- Retort, Drip Pad and Ramp Access Areas including Tracking of Drillage off the Drip Pad Forklifts or Pedestrians
- Finished Product Storage/Drying Areas including Treated Wood Stored Outside

STORMWATER POLLUTION PREVENTION PLAN

**CULPEPER OF NEW ENGLAND, LLC
S. LANCASTER, MASSACHUSETTS**

SECTION III

POTENTIAL POLLUTANT SOURCES

- Vehicle and Equipment Fueling
- Vehicle and Equipment Washing
- On-site Sewage Disposal System

BULK CHEMICAL AND FUEL STORAGE OR TRANSFER AREAS

Above ground tanks are used for the bulk storage of treating solutions and this facility has two (2) above-ground one thousand (1,000) gallon diesel fuel tanks and one (1) above ground five hundred (500) gallon diesel fuel tank. The one thousand (1,000) gallon tank that is north of the garage is a dispensing tank and the one thousand (1,000) gallon tank that is south of the kiln building is a storage tank. The five hundred (500) gallon tank is in the boiler room and is used as boiler fuel. There is also a two hundred seventy-five (275) gallon fuel oil tank behind the garage. The diesel fuel tanks can be seen in Photographs No. 4 and 5. Bulk shipments of MCA, "Ecolife" and ACQ are received from tank trucks. This chemical concentrate is off loaded in a contained area (drip pad) near the storage tanks.

Hazardous waste generated from wood preserving facility operations primarily consist of contaminated sludge from the drip pad, sumps, and retort and also waste oils from vehicle maintenance. The sludge and any material contaminated by the treating solutions (MCA, "Ecolife" and ACQ) are regulated by EPA through the RCRA program.

Bulk chemical tanks at this site are:

- MCA-C Work Tank (horizontal) – 20,000 gallons
- MCA-C Work Tank (horizontal) – 20,000 gallons
- MCA-C Work Tank (vertical) – 5,500 gallons
- MCA-C Work Tank (vertical) – 6,900 gallons
- MCA-C Work Tank (vertical) – 6,000 gallons
- ACQ C2 Concentrate Tank (vertical) – 6,000 gallons
- "Ecolife" Concentrate Tank (vertical) – 6,000 gallons
- "Ecolife" Concentrate Tank (vertical) – 20,000 gallons

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Effluent Water Tank (vertical) – 8,400 gallons

Water Tank (vertical) – 10,000 gallons

Treating Cylinder – 20,000 gallons

RETORT, DRIP PAD AND RAMP ACCESS AREAS

On December 6, 1990, the EPA amended the Resource Conservation and Recovery Act (RCRA) by listing as hazardous waste any drip pad drippage generated during the wood preserving process. These include requirements for drip pad design, operation, and closure.

Waste Removal

Effective February 6, 1992, the drip pad and all associated collection systems will be cleaned of process residuals at least once every ninety days. Process residual solids collected during the cleaning of the drip pad containment and collection system will be placed into DOT approved hazardous waste containers. All wash water will be pumped back into the effluent system for reuse as make-up water.

Control of All Effluent Run-on/Run-off

The drip pad containment/collection system will be constructed and maintained to prevent the run-on of water accumulated from the areas outside of the drip pad.

Lumber Treatment Building and Drip Pad Tanks

MCA-C Treating Solution

"Ecolife" Treating Solution

ACQ Treating Solution

BARamine

McPherson Design

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Arch Defoamer WE

Arch Moldicide WE

Arch Mold Inhibitor K-18500

Treated Lumber Drip Pad Residence Time

The drip pad is designed and used to collect and contain preservative drippage that may occur following wood treatment. A Treated Lumber Drip Pad Residence Form (Drippage Record) will be completed recording the charge number, time of drip pad placement, time drippage ceased, etc. Following each charge, the treated lumber will be: (1) Removed from the treating cylinder. (2) Placed on the drip pad. (3) Retained on the drip pad until all drippage has ceased. (4) The date, charge number, as well as the time drippage stopped and charge removed from the drip pad will be recorded on the "Cease Drippage Form."

The drip pad has received an initial assessment and certification that it is in accordance with EPA regulations. McPherson Design provided the annual certification of the drip pad as of August 31, 2022. This certification signifies that the drip pad has been inspected and has been certified that it:

- Is constructed of non-earthen material (concrete) with an adequate coating or a liner (two layers of protection).
- Has berms or curbs around all sides preventing run-on or run-off.
 - Meets all requirements for maintenance and recordkeeping such as
 - Waste is removed at least once every 90 days.
 - The drip pad is cleaned as often as necessary to inspect it at least once every seven (7) days.
 - Drippage records are kept to meet EPA requirements.
- Meets all other EPA requirements for drip pads.

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Culpeper minimizes the tracking of drippage off of the drip pad from pedestrians by restricting pedestrian traffic to only those personnel who are part of the treating operation. Culpeper provides control of forklift traffic on and off the drip pad by having a designated forklift. Culpeper actually has two (2) dedicated forklifts.

FINISHED PRODUCT STORAGE/DRYING AREAS

Before treated lumber may be moved to the storage yard area, the EPA has directed that freshly treated wood be held on the drip pad until drippage has ceased. After removal to the storage yard area, any infrequent and incidental drippage (hereafter known as de minimis drippage) that may occur must be handled immediately and cleanup procedures addressed in a Contingency Plan. This Plan includes procedures for proper removal of contaminated waste in a timely manner and maintaining proper documentation. Although this plant now treats with MCA, "Ecolife" and ACQ, these still come in contact with a CCA contaminated drip pad, and as such, any waste materials that come into contact with the drip pad must be removed with a F035 (CCA) waste code. De minimus drippage in the storage yard from wood treated with MCA, "Ecolife" and ACQ is not considered hazardous waste.

VEHICLE AND EQUIPMENT FUELING AREAS

Fuel is delivered to the Culpeper facility by tank truck. Dispensing to vehicles and equipment is usually accomplished through standard fuel dispensers. Most spills, if they occur, would be relatively minor. If any spills were to occur, they would be cleaned up by facility personnel and/or private contractors under the supervision of the local fire department. In the event that a spill does occur, and happens to reach the storm sewer system, a licensed cleanup contractor will be immediately dispatched to clean out the storm

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lines and recover spilled fuel. The diesel fuel tanks have a person present at all times during refueling. The diesel fuel tanks can be seen in Photographs No. 4 and 5.

VEHICLE AND EQUIPMENT MAINTENANCE AREAS

All maintenance is completed on-site in the garage, located at the east side of the site. Culpeper stores the following in the garage, as of the date of our visit:

Anti-freeze – Two (2) fifty-five (55) gallon drums

Motor Oil – One (1) fifty-five (55) gallon drum

Brake Fluid – One (1) five (5) gallon container

Hydraulic Fluid – One (1) fifty-five (55) gallon drum

Used Oil – Two (2) fifty-five (55) gallon drums

The secondary containment for the above petroleum products are two (2) prefabricated plastic containment units. The sizes are twenty-six inches (26") wide by fifty-one inches (51") long by seven inches (7") deep.

ON-SITE SEWAGE DISPOSAL SYSTEMS

On-site sewage disposal systems (OSDS) include conventional septic systems, large scale conventional systems, alternative and innovative designs, and private sewage treatment facilities. The term applies to any residential or industrial sewage that is not treated or planned for treatment in a centralized public sewer system.

Proper treatment of wastewater effluent with on-site disposal systems is an essential component of surface water quality protection. Treated wastewater usually reaches surface waters by groundwater recharge or by groundwater/surface water interfaces.

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Culpeper currently has two (2) on-site sewage disposal systems that are a septic tank for the office restrooms and a septic tank for yard office/employee breakroom restrooms. The septic tanks are shown on the site map.

RECEIVING WATERS

Drainage across the property generally flows from north to south. A small percentage of the Culpeper property is covered by impervious surfaces (i.e., buildings, concrete, asphalt, etc.). Due to the gravelly nature of the pervious surfaces across the property, it is believed that storm water runoff from the Culpeper property is generally absorbed into the ground. Any excess runoff flows into nearby outfalls, numbered 1-4, then into Goodridge Brook, and eventually to the Nashua River.

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INTRODUCTION OF COLLECTED DATA

The multi-sector general permit requires that the following information be gathered in order to determine and evaluate pollution sources:

- Site Map with topographic information.
- Description of significant material handling.
- Pollutant lists.
- Wood preserving facility size.
- Significant spills or leaks.
- Summary of sampling data.

SITE MAP WITH TOPOGRAPHIC INFORMATION

The wood preserving facility site map must show the following: discharge structures, drainage areas, impervious areas, areas of stormwater runoff contact with pollutants, actual or potential, location of existing structural control measures (i.e., ditches, berms, or retention ponds), surface water locations and areas of existing or potential soil erosion. All of the above information should be marked or delineated on the wood preserving facility site map. Appendix A-2 is a copy of the site map at Culpeper. This site map lists improvements made by Culpeper to enhance stormwater management.

TOPOGRAPHIC MAP

The topographic map should extend beyond the property boundaries of the wood preserving facility, showing the following: the building structures, surface water bodies (including springs and wells) and the wood preserving facility discharge points where the wood preserving facility's stormwater discharge leaves the property and enters the municipal storm drainage system or enters a water body. The topographic map must accompany the walking tour of the wood preserving facility so that any outfalls that are not shown on

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the present map can be added and the drainage area determined. A copy of the site map and the topographic map should be inserted into the SWPPP document. Appendix A-2 is the Site Map.

Culpeper is not including a topographic map as a separate enclosure to the SWPPP document. The information required on the topographic map is shown on the site map and drainage and direction of slope is obvious.

As part of the SWPPP requirements, the facility must list the receiving waters that receive the storm water from the facility site. Water leaving the site eventually makes its way to the Nashua River.

DESCRIPTION OF SIGNIFICANT MATERIAL HANDLING

Wood preserving facilities must provide a description of the following items:

- Significant materials that have been treated or disposed of within the past three years. Any material that has been spilled or leaked in significant quantities to the stormwater discharge since November 19, 1988.
 - Materials, equipment, and vehicle management practices employed to minimize contact of the stormwater discharge and significant materials.
 - Material loading, unloading and access areas.
 - Existing structural control measures to reduce pollutants in the stormwater discharge.
 - Methods of on-site storage and disposal of significant materials.
 - Outdoor storage, manufacturing, and processing activities including activities that generate significant quantities of dust or particulates.

Significant Materials Treated

Significant materials include but are not limited to: raw materials, fuels, solvents, detergents, plastics, finished materials such as metallic products, food processing or production raw materials, hazardous substances designated under Section 101 (14) of CERCLA, any chemical the facility is

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required to report pursuant to Section 313 Title III of SARA, fertilizers, pesticides, and waste products.

The significant materials treated at Culpeper Cortland include raw white lumber that is treated with MCA, "Ecolife" and ACQ.

Significant Materials Stored

1. Micronized Copper Azole (MCA), bulk storage in containment area (tank farm).
2. "Ecolife," bulk storage in containment area (tank farm).
3. Alkaline Copper Quaternary (ACQ), bulk storage in containment area (tank farm).
4. BARamine, totes stored in treating building.
5. Mold Inhibitor, totes stored in treating building. Mold inhibitors include WE and K18500.
6. Diesel Fuel.
7. Anti-Freeze, stored in containment area (garage).
8. Motor Oil, stored in containment area (garage).
9. Brake Fluid, stored in containment area (garage).
10. Hydraulic Fluid, stored containment area (garage).
11. Used Oil, stored in containment area (garage).

Significant Materials Disposed

1. Micronized Copper Azole (MCA) contaminated solid waste stored in drums in containment area (tank farm).
2. "Ecolife" contaminated solid waste stored in drums in containment area (tank farm).
3. Alkaline Copper Quaternary (ACQ) contaminated solid waste stored in drums in containment area (tank farm).
4. Used Oil stored in fifty-five (55) gallon drums in containment area (garage).

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This includes any storage yard drippage tank clean outs and pit clean outs.

Materials Management Practices

Any practices designed to limit contact of pollutant with the stormwater discharge. A roof constructed over an above ground storage tank, containing diesel fuel, would be an example of a material management practice that would limit contact of significant material with rainfall. The following are materials management practices used at Culpeper:

1. All freshly treated lumber kept on drip pad and under a roof until drippage has ceased.
2. All of the significant materials either stored or disposed of are under a building roof or in a containment device. The treating chemical storage tanks in the tank farm are under a roof and have secondary containment.
3. There is a liner below the drip pad.
4. MCA, "Ecolife" and ACQ are unloaded in the containment area.
5. The drip pad is not sealed but does have a concrete berm and a roof to prevent run-on and run-off.

Equipment Management Practices

Many types of equipment are associated with wood preserving facilities including pressure retorts, bark strippers, sawmills, fueling trucks, maintenance equipment, freight transfer vehicles, and forklifts.

Some of the equipment management practices that are adhered to at Culpeper are as follows:

1. Equipment goes through a preventative maintenance program.
2. Spills or leaks from equipment are cleaned up immediately.
3. Washing of equipment does not occur on-site. The equipment is rinsed off from time to time in several places throughout the site. There is no vehicle washing area.

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Vehicle Management Practices

Maintenance of vehicles can be a significant source of stormwater pollutants. Materials associated with vehicle maintenance include waste oil, and other degreasers used to clean engine parts, anti-freeze, radiator flush, brake fluid and battery acids and sludges.

Vehicle maintenance is handled on-site in the garage, which is in a building, under a roof with secondary containment.

Material Loading Areas

Describe and define areas (marked on site map as well) in which materials are loaded, unloaded, or stored at the wood preserving facility and a potential exists for exposure to stormwater. Culpeper has the following loading areas:

1. Finished product is loaded on trucks throughout the site.
2. Hazardous waste for disposal is loaded at drip pad.

Material Unloading Areas

1. Micronized Copper Azole (MCA), "Ecolife," and Alkaline Copper Quaternary (ACQ) are unloaded to bulk storage while the truck is on the pavement beside the drip pad and is in a containment area.
2. Diesel fuel is unloaded from a tanker truck directly into two (2) one thousand (1,000) gallon and one (1) five hundred (500) gallon above ground tanks.

Material Storage Areas

1. Micronized Copper Azole (MCA), "Ecolife" and Alkaline Copper Quaternary (ACQ) bulk storage tanks are in a contained area (tank farm).
2. Diesel fuel is stored in three (3) above ground tanks.

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Existing Structural Controls

Existing structural controls could include berms around drip pads, sealing drip pad surfaces, liner under drip pad, enclosure of the drip pad, retort, or copper azole tanks, storing finished wood under cover, oil/water separators installed on drain lines which then discharge to a sanitary sewer. Other structural controls could include detention ponds and/or marsh systems which can provide for settling, oxidation of volatiles, and water quality benefits from plant uptake of nutrients and other pollutants. Culpeper has the following structural controls:

1. All pressure treating activities occur inside buildings or under a roof or in a containment area.
2. Drip pads are constructed to meet or exceed Subpart W in RCRA Regulations.
3. Drip pads and berms are structurally sound.
4. Berms or curbs are located around drip pads.

Existing Non-Structural Controls

Existing non-structural controls could consist of directives and policies concerning suitable locations for cleaning and maintenance activities and policed bans against performing such activities in non-designated locations. Culpeper has the following non-structural controls:

1. Culpeper will provide impacted employees with orientation on spill prevention and good housekeeping.
2. Culpeper has established regulatory compliance manuals.
3. Culpeper has established an employee training procedure.

Industrial Stormwater Treatment Facilities (If Any)

Culpeper does not currently have an on-site stormwater treatment facility. The stormwater sheds off-site through natural slope and outfalls.

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Methods of Off-Site Disposal of Significant Materials

An example of this type includes the contracted removal of sludge from the retort and sump areas on a regular and scheduled basis. Also included here are provisions for services from a contracted hazardous material disposal specialist firm on an as-needed basis.

1. All Micronized Copper Azole (MCA), "Ecolife" and Alkaline Copper Quaternary (ACQ) contaminated materials at Culpeper are disposed of as per RCRA.

Methods of On-Site Storage of Significant Materials

1. All waste materials (oil, filters, grease) are stored in secondary containment in the garage until removed per RCRA requirements.
2. All virgin materials (MCA, "Ecolife," ACQ, fuel oil, mold inhibitor) are stored in confined areas.

Activities That Generate Significant Quantities of Dust or Particulates

1. Vehicle traffic (forklifts, trucks) in unpaved areas of the plant.

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POLLUTANT LIST

The wood preserving facility is required to list any pollutants that have a reasonable potential to be present in the stormwater discharge in significant quantities. The definition of significant quantities varies from item to item. In general, a significant quantity can be taken to be any quantity that is not consumed within a normal day's operations or would result in spills beyond the immediate clean-up capabilities of the individual charged with the use of the materials. A significant quantity also relates to a "reportable" quantity for those substances that are regulated. A list of pollutants at Culpeper and their use is as follows:

POLLUTANT PRESENT	USE
Micronized Copper Azole (MCA)	Wood Preservative
"Ecolife"	Wood Preservative
Alkaline Copper Quat (ACQ)	Wood Preservative
WE and K18500	Mold Inhibitor
BARamine	Wood Preservative
Diesel Fuel	Fuel for Vehicles
Anti-freeze	For Vehicles
Motor Oil	For Vehicles
Brake Fluid	For Vehicles
Hydraulic Fluid	For Vehicles
Used Oil	For Vehicles

Table B-1 in Appendix B is a sample "Pollutant List" form for your use in the future should the pollutant list change.

WOOD PRESERVING FACILITY SIZE

The wood preserving facility size should be estimated as well as the percentage of impervious area. Impervious areas are paved areas and buildings. It is also useful to break the wood preserving facility into subdrainage areas within which "industrial activity" occurs to each significant outfall.

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Wood Preserving Facility Size is approximately 18 acres or 784,000 square feet.

Impervious Surface Area Estimate 2.17 acres or 94,525 square feet or 12% of the total property.

SIGNIFICANT SPILLS OR LEAKS

The wood preserving facility must list all historical spills or leaks of toxic or hazardous pollutants to the stormwater system that have occurred in the last three years. This list must include: toxic chemicals, listed in 40 CFR 372 that have been discharged to stormwater as reported on EPA Form R, and oil or hazardous substances in excess of reportable quantities, 40 CFR 110, 117 or 302. There have been no spills or leaks of a reportable quantity at this site in the last three years.

Table B-2 in Appendix B is a sample "History of Past Spills" form for your use in recordkeeping of future spills.

OUTFALL INSPECTIONS AND SAMPLING REQUIREMENTS

If Most states require a visual inspection of the outfalls on an interim basis that is quarterly up to annually. In addition, stormwater samples must be taken at the outfalls at various intervals, depending on the state. The visual inspections should be completed by personnel that are trained on what to look for. The employees' training needs to be documented and the results of the inspections should be recorded on a typical state form or on the form included with this SWPP Plan, in Appendix B, Table B-5 titled "Drainage System Maintenance and Inspection."

The inspection interval needs to be confirmed for your state. In a SWPP Plan previously provided to Culpeper by the Industrial Compliance Group in 2017, stated that the visual inspection of the outfalls and drainage features leading to the outfalls should be completed quarterly. It is our understanding that Massachusetts only requires an annual visual inspection. The visual inspection includes walking the drainage features, like swales and ditches, as well as inspecting the outfalls for the following:

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- Color of foliage or dirt
- Odor
- Displaced solids
- Settled solids
- Foam
- Oil sheen
- Other obvious indicators of stormwater pollution

The standard form used for this inspection is the same as mentioned previously in Appendix B, Table B-5. This form lists other info needed. It is our understanding that Culpeper of New England, LLC does not have to submit this info to the State unless specifically requested to do so.

As for stormwater sampling at the outfalls, Culpeper of New England, LLC needs to purchase the proper grab sample containers. Before starting, personnel should be properly trained on how to sample and how to process the sample. The training should be kept on a "training log." The proper procedure for taking the grab samples is as follows:

Procedure:

Take a minimum of one (1) grab sample from the discharge associated with industrial activity resulting from a measurable storm event, providing the interval from the preceding measurable storm is at least 72 hours. The 72-hour storm interval is waived when the preceding measurable storm did not yield a measurable discharge, or if you are able to document that less than a 72-hour interval is representative for local storm events during the sampling period. Take the grab sample during the first 30 minutes of the discharge. If it is not practicable to take the sample during the first 30 minutes, sample as soon as practicable and describe why a grab sample during the first 30 minutes was impracticable.

Prior to taking the samples, the discharge and accumulated water needs to be inspected for:

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

Frequency of Outfall Sampling

Timber Products, Wood Preserving, SIC Code 2491 falls within the Benchmark Monitoring Program. This means that Culpeper needs to establish benchmark readings starting in the first full quarter following the date of September 2, 2015, or the date of your NPDES permit date, whichever comes later. Benchmark monitoring requires that Culpeper sample at least once in each of the following three (3) month intervals:

January 1 – March 31

April 1 – June 30

July 1 – September 30

October 1 – December 31

This completes one (1) year of benchmark monitoring.

After establishing the Benchmark Monitoring, if the average of your next four (4) quarterly readings do not exceed the benchmark, Culpeper of New England, LLC would have fulfilled the monitoring requirements for the rest of the NPDES permit term.

If the average of your next four (4) quarterly readings exceed the benchmark, Culpeper would continue to take quarterly readings for the duration of the NPDES permit term. Culpeper must

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make modifications to try and reduce pollutant readings. These BMP's need to be documented along with their results.

All samples are to be taken properly, sampled properly, transported to the lab properly and the lab shall provide the results along with the state's allowable limits for that pollutant. If the readings are above the allowable limit, Culpeper shall make modifications (BMP's) to reduce the readings.

Outfall Maintenance

Culpeper of New England, LLC shall inspect the outfalls on a quarterly basis and make adjustments as needed to make the outfalls function better. This shall not be done during or just prior to a required sampling event. Adjustments can include cutting excessive grass, removing excessive weeds, rebuilding of eroded dirt or structure, or maybe just adjusting stone or gravel to allow for an easier way to take the readings.

SUMMARY OF SAMPLING DATA

If the wood preserving facility has conducted sampling of the stormwater discharges, the data should be included in the SWPPP document. Previous sampling data will be useful in determining the source of pollutants and initiating controls. Culpeper has four (4) outfalls at this site. Most of the Stormwater leaves the site by way of the four outfalls. Although we have not included sampling data in this report, Culpeper of New England, LLC is currently working on a program to update this sampling data.

Table B-3 in Appendix B is a sample "Sampling Event Record" that can be used to list sampling results, in the future.

STORMWATER MANAGEMENT CONTROL

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STORMWATER MANAGEMENT CONTROL

INTRODUCTION

This section of the SWPPP describes stormwater management measures to control and abate water quality impairment associated with the activities described in the preceding sections. Culpeper has initiated a positive attitude in providing stormwater control management for their facility. The following paragraphs along with the site map delineate stormwater control management practices introduced by Culpeper.

THE NON-POINT SOURCE POLLUTION PROCESS

Non-point source pollutants are transported to surface water by a variety of means, including run-off and ground water infiltration. Ground water and surface water are both considered part of the same hydrologic cycle when designing management measures. Ground water contributions of pollutant loadings to surface waters are often very significant. The transport of non-point source pollutants to surface waters through ground water discharge is governed by physical and chemical properties of the water, pollutant, soil, and aquifer.

Source control is the first opportunity in any non-point source control effort. Source control methods vary for different types of non-point source problems. Some examples of source control which have been implemented at the Culpeper Facility are as follows:

1. Culpeper has reduced/eliminated the introduction of pollutants to the land area by providing a drip pad in the treating area to collect all treating chemicals which are pumped back into the effluent tank for reuse in treating future wood. Culpeper has a portion of the treated lumber under buildings that have a roof; thus, reducing the amount of rainwater that can wash the pollutants to the ground.
2. Preventing non-introduced pollutants (such as loose dirt and sediments) from leaving the site during land disturbing activities such as rainstorms. Culpeper has added gravel to areas that showed signs of erosion.

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3. Preventing interaction between precipitation and introduced pollutants. Culpeper has provided a roof over the drip pad so that precipitation is not allowed to come into direct contact with the treating chemicals.

In addition to source control measures, a good SWPP plan should also include delivery reduction measures. This involves preventing the pollutants from leaving the discharge area through surface run-off or ground water contact. The pollutants at Culpeper are controlled by the use of a concrete drip pad with a liner. The drippage reaches the drip pad that has a positive slope towards a drain that goes through a filter and then is pumped back into an effluent tank for reuse. The use of the roof and drip pad with liner is an example of delivery reduction measures that does not allow the pollutant to come into direct contact with surface run-off or ground water. In addition, an engineering control is in place involving a longer final vacuum to reduce the amount of drippage of freshly treated lumber. The drip pad also has curbs to control run-on of stormwater or run-off of source pollutant.

PREVENTATIVE MAINTENANCE

A Preventative Maintenance program is an effective and cost-efficient measure in pollution prevention. It is easily performed at a relatively low cost and may yield great savings in the long run. Preventative maintenance includes inspection of facility/tenant equipment and systems, such as pressure cylinder and drip pad areas, equipment cleaning facilities, all vehicular and maintenance facilities, and any structural source controls already in place, such as drip pad sumps and tank farm containment.

The preventive maintenance program at Culpeper includes the following:

1. Forklifts are serviced every 6 to 12 weeks.
2. Sump areas are inspected every week.
3. Overflow safety system is inspected once a month.
4. Drip pad surface is swept or pressured washed weekly.
5. Drip pad is inspected weekly for cracks.
6. Storage tank containment is inspected weekly for cracks.

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7. Storage yard has daily inspection for drippage.
8. Hazardous waste storage area is inspected weekly.
9. Treating solution transfer piping is inspected daily.

The preventive maintenance inspections are carried out by trained personnel who are designated SWPPP Committee Members. These committee members are familiar with the systems and equipment to be monitored and tested. The inspection schedules have been established by the committee in conjunction with the facility manager and brought to the attention of all employees.

Documentation and retention of inspection records is currently a part of the preventive maintenance and inspection program at Culpeper. A tracking or follow-up procedure is used to ensure that the appropriate response to the inspection findings has been made. All inspection documentation and records will be maintained with the SWPPP documentation for a period of five years.

Table B-4 in Appendix B is a sample "Maintenance and Inspection" form that could be used when inspecting vehicles and equipment.

DRAINAGE SYSTEM

Stormwater drainage system will be inspected at least four times a year. The inspection will consist of physical observation and possibly chemical sampling as required at the discharge points. The physical inspection of the outfalls will include observation of flow, odor, clarity, floatables, stains, and vegetation. A description of each of these items to be inspected is as follows:

- Flow If flow is present, and rain has not occurred within the past three days, there may be a problem requiring further investigation unless the source is positively known and is non-polluting
- Odor The presence of any odor from the drainage system

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S. LANCASTER, MASSACHUSETTS**

SECTION V

STORMWATER MANAGEMENT CONTROL

- **Clarity** If water is present, standing or flowing, and it is anything but clear
- **Floatables** If there is floating debris, garbage, sewage, or oily sheen
- **Stains, etc.** If stains are present on lined channels/pipes, or other than the normal vegetation or soil color, may be an indicator requiring further investigation
- **Vegetation** If vegetation in the discharge channel is more luxurious or, conversely appears stressed in comparison to adjacent vegetation, this is likely an indicator of excess nutrients or excess contaminants and requires further investigation.

In addition to the above items, the inspection will also note siltation or scour problems below the outfall.

Table B-5 titled "Drainage System Maintenance and Inspection" can be used to record inspections of the stormwater drainage system. This table is included in Appendix B.

PAVED AREAS

Inspection of paved areas will be focused on checking the surfaces to ensure that they are clean of chemicals, grease, oil, solvents and fuels, and other pollutants. In order to reduce the amount of pollutants on paved areas, the pollutants will be kept covered in most cases under roofed areas. Other maintenance activities, such as periodic inspections of containment areas as well as equipment that contains the pollutants, will help to ensure that the paved areas are not a source of pollutant transport.

In addition to inspecting the surface of the paved areas for pollutants, the paved areas should also be inspected for large cracks which would allow the potential for pollutants to enter into the ground water system.

The use of herbicides and petroleum products to reduce vegetation growth in paved areas will be monitored. The use of herbicides or other chemicals will be kept to a minimum and those used will have a low toxicity and persistence. Frequency of application will be reduced to a minimum. Grouting of joints and cracks will be used whenever possible as an alternative to herbicidal application.

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DRIP PAD

The drip pad receives a yearly certification which includes review of all documentation, inspection of the drip pad for cracks, and inspection of curb and berms to ensure that pollutants are not reaching the environment.

As part of the certification program for the drip pad, Culpeper is required to conduct weekly inspections of the drip pad, as well as after every storm event, to ensure that there are no cracks in the drip pad itself. In addition, Culpeper is required to maintain a facility operating log that keeps a record of treatment time, etc. and documentation when the drippage has ceased prior to removing the product from the drip pad.

If any cracks, chips, or any other deterioration are discovered, these areas are taken out of use until the deficiency is corrected. The repairs are documented in a drip pad weekly inspection report and is included as part of the yearly certification for the drip pad. We have not included the recordkeeping for the drip pad in this report. Information concerning the recordkeeping for the drip pad can be found in the yearly Subpart W certification.

It should be noted that the drip pad was originally assessed in 2012 and exhaustive corrections were completed to provide a drip pad that was in accordance with EPA regulations. Since that time, the drip pad has been recertified from 2017 through 2022 to be in full compliance with the EPA regulations.

CLEANING FACILITIES AND EQUIPMENT

The maintenance and cleaning of equipment is very important where a large number of vehicles are concerned. Vehicle maintenance is done on-site in the garage. Washing of vehicles is not completed on site, however the vehicles are rinsed off from time to time throughout the site. There is no designated vehicle washing area.

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STORMWATER MANAGEMENT CONTROL

MATERIALS STORAGE AREAS

Tanks for material storage will be inspected for leaks, corrosion, deterioration of the foundation, masonry retaining walls and slab of the tank farm, and closure of drainage valves. Inspection of the seams, rivets, nozzle connections, valves, connecting pipelines, hoses, and evidence of corrosion, pitting, cracks, dry rot, abnormalities, and deformation will be required. The tanks and equipment for material storage areas will be inspected on a weekly basis. Records of the inspections will be kept at the Culpeper facility.

All storage tank levels will be logged daily and whenever products are loaded or off-loaded. Tank levels are also to be monitored during operational use. Tank levels will be carefully noted when use is discontinued and remeasured whenever operations are restarted. Major differences in levels, of course, will be indicative of leakage.

Liquid storage facilities will have sumps or leak trays located below valves and drain points and will be contained in a bermed area having removable absorbent materials to soak up any spillage. Areas where liquids are stored will have a ready supply of absorbent materials depending on the volume of liquid material stored. Micronized Copper Azole (MCA), "Ecolife" and Alkaline Copper Quaternary (ACQ) containment area drip pads and tram areas are to drain into a sump. The liquid is then reused in subsequent treatment.

FUEL/CHEMICAL TRANSFER PIPELINES

Inspections of fuel/chemical transfer pipelines will include visual examination for evidence of deterioration of pipelines, hoses, sumps, pumps, valves, seals, and fittings. Particular attention will be given to the items above and any sensors required to interact with the tank being filled. (Many facility spills result from fueling attendants depending on such sensors and being inattentive while the tank is being overfilled.) A person is present at all times during filling of tanks.

At Culpeper, all piping runs through containment areas such that there is no piping on the outside of the containment area and spillage can be controlled. In addition, Culpeper takes level readings before and after pumping has finished to determine if any fuel/chemical has leaked between transfer.

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STORMWATER MANAGEMENT CONTROL

Absorbent material will be readily available to maintenance and/or tank truck personnel in these areas should a spillage occur.

MATERIAL TRANSFER, LOADING AND UNLOADING

Staged materials for loading or unloading will be kept out of stormwater flow paths by storage within bermed areas or on platforms surrounded by dikes or berms which direct stormwater flow away from the materials.

Inspections of loading and handling areas will be quite frequent in the early phases of implementation of the SWPPP to ensure that loading and unloading practices are correctly done. Areas will be inspected for clean and dry loading platforms, clean equipment, proper storage of loading equipment and maintenance of any equipment used.

Diesel fuel is delivered by tanker trucks to two (2) one thousand (1,000) gallon and one (1) five hundred (500) gallon above ground storage tanks. These storage tanks can be seen in Photograph No. 4 and 5.

MAINTENANCE AND INSPECTION OF WOOD TREATING EQUIPMENT

Inspection and maintenance guidelines for pressure treating equipment will follow the manufacturer's specifications. The equipment itself will be serviced in designated areas as indicated above. Special attention will be paid to those portions of the equipment that come into contact with the treating solution including among others: pressure retorts, trams or conveyor mechanisms, pipes (including vacuum hoses for liquid extraction), tanks for liquid conveyance, and associated valves, fittings, nozzles, and tank seams. Particular attention will be paid to correcting leaks and replacement of deteriorated rubber or plastic hoses, pipes, washers, and gaskets.

STORMWATER POLLUTION PREVENTION PLAN CULPEPER OF NEW ENGLAND, LLC S. LANCASTER, MASSACHUSETTS

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STORMWATER MANAGEMENT CONTROL

GOOD HOUSEKEEPING

Good housekeeping refers to the cleaning and maintenance practices conducted at the facility. Good housekeeping is an important component of the pollution prevention plan. Periodic training of employees in housekeeping techniques for those areas of the facility where pollutant sources are found reduces the significant material contamination of stormwater. Housekeeping practices used at Culpeper are as follows:

1. Floors are swept clean on a regular basis.
2. All chemicals are stored inside containment areas and devices.
3. Overflow sensor is installed on the fuel pumps.
4. Unloading areas are kept clean.
5. All hazardous waste is kept in the containment area.
6. Oil leaks from forklifts, etc. are cleaned up immediately.
7. A written protocol is established on Subpart W drip pad procedures.
8. Employee interest in good housekeeping has been stimulated and maintained.

Disposal of those materials used to collect spills are handled by a qualified hazardous material handling contractor. Material loading and unloading areas are kept clean by manual sweeping.

Micronized Copper Azole (MCA), "Ecolife" and Alkaline Copper Quaternary (ACQ) drippage is collected and returned to the collection sump which passes the solution back through a filter back into the effluent tank for reuse.

WRITTEN PROTOCOL

A written protocol for the Subpart W drip pad for the Culpeper facility has been prepared and will be followed in the future. Included within this protocol is a description of areas, operations, and equipment to be inspected, frequency of inspection, checklists and procedures to be used, records of inspection and filing requirements, and a mechanism for revising protocols.

STORMWATER POLLUTION PREVENTION PLAN

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STORMWATER MANAGEMENT CONTROL

EMPLOYEE INVOLVEMENT

Maintaining employee interest is a vital part of a good housekeeping program. Good housekeeping goals will be established, and regular inspections performed by managers. Some of these goals will include the following:

1. Training program
2. Safety meetings
3. Periodic on-site training
4. Periodic housekeeping inspections

SPILL CONTROL AND COUNTERMEASURES

Spill control has been delineated in all the previous documentation. The potential areas of spill are maintained in a containment area or in an area that is bermed or curbed and sloped to maintain any spillage. In addition, numerous inspections are completed to ensure that spillage is kept to an absolute minimum. Culpeper has also installed such items as overflow switches on fuel tanks.

As part of spill control and countermeasures, the following table lists the location, potential chemical, equipment committed to this area and the personnel that will be responsible. As you can see from this table, the three main areas of potential spillage are the tank farm, the diesel fuel storage tank area, and the garage. The potential chemicals in the tank farm are Micronized Copper Azole (MCA), "Ecolife" and Alkaline Copper Quaternary (ACQ). Equipment committed to the tank farm is shovel, brooms, vacuum, sand, cement, sawdust, absorbent material, rubber boots and gloves, rain suits, respirators, and face shields. The personnel responsible for spill control and countermeasures in the tank farm area are the personnel working on the drip pad in the treatment process.

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STORMWATER MANAGEMENT CONTROL

SPILL CONTROL AND COUNTERMEASURES

LOCATION	POTENTIAL CHEMICAL	EQUIPMENT COMMITTED	PERSONNEL
Tank Farm	1. Micronized Copper	1. Shovels	Treating plant personnel
	2. "Ecolife"	2. Brooms	
	3. ACQ	3. Vacuums	
		4. Sand	
Garage	1. Anti-freeze	5. Cement	Vehicle Maint. Personnel
	2. Motor Oil	6. Sawdust	
	3. Brake Fluid	7. Absorbent matting	
	4. Hydraulic Fluid	8. Rubber boots, gloves	
	5. Used Oil	9. Rain suits	
		10. Respirators	
		11. Face shields	
Diesel Fuel Storage Tank Area	1. Diesel Fuel	1. Vacuum 2. Shovels Absorbent	Storage Yard Personnel

STORMWATER MANAGEMENT PRACTICES

The SWPPP document needs to identify measures that are used to enhance stormwater management practices. One of these measures that is a part of the Culpeper facility SWPPP documents is sediment control and erosion prevention. As part of this SWPPP document, Culpeper has installed concrete and gravel to reduce erosion. Culpeper has also decided to enclose the vehicle maintenance building to reduce

STORMWATER POLLUTION PREVENTION PLAN

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SECTION V

STORMWATER MANAGEMENT CONTROL

potential for stormwater runoff. They also have a plastic secondary containment in the vehicle maintenance area. The BMPs are located on the site map.

Some additional BMP's that Culpeper has installed are as follows:

1. Installed engineering controls for a longer final vacuum on treating process (less drippage).
2. Yard basins and storm drains have been installed on site to control stormwater.
3. Small spills are cleaned up immediately.
4. Hazardous materials are stored in 55-gallon drums and properly sealed. Drums are disposed of through a professional company (Safety Kleen, Inc.).
5. Drippage controls and drip pad cleaning are maintained.
6. Chemical and diesel fuel is loaded and unloaded under a strict written protocol.

EMPLOYEE TRAINING

A large part of the success of a SWPPP is the capability and interest of the employees responsible for implementing and maintaining the program. Personnel need to understand the importance of the program and the goals of the SWPPP. Personnel must be trained in the techniques of response, removal, and documentation. The permit authority representatives will be inspecting the multi-sector general permit participants, and it is important that they are received by trained, knowledgeable personnel who have access to the SWPPP, environmental files, and other documentation. The SWPPP documentation must be current and complete when inspected.

Annual training workshops and meetings should be established, at which time employee participation and input should be encouraged. Training schedules can be recorded in Table B-6 in Appendix B. New techniques of stormwater management controls as well as changes in permit compliance or limits should be explained to the employees. Training as a whole should address:

- Spill response.
- Good housekeeping and material management practices.

STORMWATER POLLUTION PREVENTION PLAN

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SECTION V

STORMWATER MANAGEMENT CONTROL

Particular facility features and operations designed to minimize stormwater pollution.

ENDANGERED SPECIES OR CRITICAL HABITAT PROTECTION

It is not expected that discharge-related activities from this facility are likely to jeopardize the continued existence of any species that are listed as endangered or threatened under the Endangered Species Act (ESA) or result in the adverse modification or destruction of their habitat. It is beyond the scope of our work to research or evaluate this information under all of the available sources; to mention just a few include the National Marine Fisheries Service (NMFS), the Fish and Wildlife Service (FWS), the Endangered Species Map for this State and other Local, State or National sources. The lists change frequently, so any confirmation would only apply to a specific point in time anyway. We suggest that the client stay somewhat familiar with these sources and maintain open communication with the State DEQ or DEP so that the client will hear of any changes that affect this determination.

NATIONAL HISTORIC PRESERVATION ACT

It is our opinion that discharge-related activities from this facility are not expected to have an effect on any property that is listed or eligible for listing on the National Register of Historic Places. It is beyond the scope of our work to research or evaluate this information under all of the available sources; to mention just a few include the National Register (NRHP), the State Cultural Resource Information System (example: MACRIS for Massachusetts), the State Historic Preservation Officer (SHPO), the Tribal Historic Preservation Officer (THPO) and other Local, state, or National sources. The lists change frequently, so any confirmation would only apply to a specific point in time anyway. We suggest the client stay somewhat familiar with these sources and maintain open communication with those sources so that the client will hear of any changes that affect this determination.

NON-STORMWATER DISCHARGES

**STORMWATER POLLUTION
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SECTION VI

NON-STORMWATER DISCHARGES

CERTIFICATION

The multi-sector general permit requires non-stormwater discharges to be eliminated prior to the implementation of the SWPPP. Facilities must certify that there are no non-stormwater discharges present in the stormwater drainage system. All facilities must certify and monitor outfalls for dry weather discharges.

**STORMWATER POLLUTION
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SECTION VI

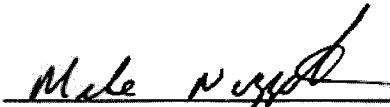
NON-STORMWATER DISCHARGES

NON-STORMWATER CERTIFICATION

The regulations require that the appropriate person certify that there are no non-stormwater discharges present.

Name:	Mr. Mike Nuzzolilo
Title:	Operations Manager / S. Lancaster Facility
Wood Preserving Facility Name:	Culpeper of New England, LLC
	840 Sterling Road, S. Lancaster, Massachusetts

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

Signature:	
Title:	Operations Manager / S. Lancaster Facility
Date:	4-8-22

COMPREHENSIVE SITE COMPLIANCE EVALUATION

**STORMWATER POLLUTION
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SECTION VII COMPREHENSIVE SITE COMPLIANCE EVALUATION

INSPECTIONS

Inspections of the facility will be conducted by the permit authority to verify elements of the SWPPP are accurate and have been implemented. The inspection may yield comments which require a response to comments by the board and are required to be retained as part of the SWPPP. As listed under Section 311 of the Clean Water Act this SWPPP is considered a report that shall be available to the public.

Because the requirements of the evaluation overlap with the requirements of this SWPPP format, it is recommended that Table 7-1 be completed for each evaluation at a frequency required by the regulator. Summary information should be listed with specific sections referenced in the documentation.

Amendments to the SWPPP are required to include the dated signature and title of the person responsible for preparation of the SWPPP.

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SECTION VII COMPREHENSIVE SITE COMPLIANCE EVALUATION

TABLE 7-1
SITE COMPLIANCE EVALUATION FORM REPORT

Date and Time of Inspection(s):
Inspector:
Name and Title:
Pollutant Potential To Enter Drainage System:

**STORMWATER POLLUTION
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SECTION VII COMPREHENSIVE SITE COMPLIANCE EVALUATION

MEASURE(S)	
<u>MEASURES TO REDUCE STATUS</u>	<u>EVALUATED</u>
Pollutant Loadings:	

**STORMWATER POLLUTION
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SECTION VII COMPREHENSIVE SITE COMPLIANCE EVALUATION

EQUIPMENT		
<u>STATUS</u>		<u>INSPECTED</u>
EQUIPMENT INCLUDING SPILL RESPONSE EQUIPMENT INSPECTED:		
ACTION RECOMMENDED AS A RESULT OF THIS EVALUATION:		
CHANGES TO SWPPP:		
DATE:		
COMMENTS:		

**STORMWATER POLLUTION
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SECTION VII COMPREHENSIVE SITE COMPLIANCE EVALUATION

SUMMARY OF RECOMMENDATIONS FOR SWPPP COMPLIANCE

**STORMWATER POLLUTION
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SECTION VIII

**SUMMARY OF RECOMMENDATIONS
FOR SWPPP COMPLIANCE**

RECOMMENDATIONS

The following is a summary of recommendations to be implemented as part of the SWPPP document.

- I. Culpeper of New England, LLC has four (4) discernable outfalls where water samples can be taken. If not currently in place, Culpeper needs to discuss water sampling requirements with the State and develop a sampling program that meets the State requirements. This needs to include one (1) location where sampling equipment is kept, training for personnel so that the sampling procedure is done consistently and per State regulations, written procedure for submitting samples to a lab and a set of guidelines on what to do with the sampling test results.

ENGINEER'S CERTIFICATION

**STORMWATER POLLUTION
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SECTION IX

ENGINEER'S CERTIFICATION

ENGINEERS CERTIFICATION

The multi-sector general permit requires that a Registered Professional Engineer review the SWPPP document to ensure that the facility has made a conscientious attempt to comply with EPA regulations. This certification satisfies that requirement.

"I certify under penalty of law that this SWPPP document and all attachments have been prepared by McPherson Design in conjunction with Culpeper Enterprises. The personnel at Culpeper were highly qualified to gather and evaluate the information submitted. Based on my involvement with those persons who helped prepare this document and 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."

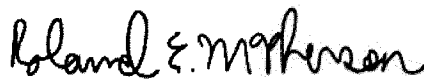
COMPANY:

McPherson Design

NAME:

Roland E. McPherson, P.E.

SIGNATURE:



TITLE:

Founder

DATE:

03/30/2022

McPherson Design

9-1



 MCPHERSON DESIGN PLLC			CULPEPER OF NEW ENGLAND, LLC WOOD TREATING PLANT SOUTH LANCASTER, MASSACHUSETTS			A-1
						SCALE:
CAD: MBM	ENG: REM	DATE: 03.30.22	SITE LOCATION			REFERENCE SHEET: --

SAMPLE TABLES AND FORMS

**STORMWATER POLLUTION
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APPENDIX B

SAMPLE TABLES AND FORMS

TABLE B-I - POLLUTANT LIST

DATE	POLLUTANT PRESENT	USE	QUANTITY ESTIMATE

STORMWATER POLLUTION PREVENTION PLAN

CULPEPER OF NEW ENGLAND, LLC
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APPENDIX B

SAMPLE TABLES AND FORMS

TABLE B-2 - HISTORY OF PAST SPILLS

DATE	LOCATION OF SPILL	TYPE OF MATERIAL	AMOUNT OF MATERIAL	CLEANUP RESPONSE

**STORMWATER POLLUTION
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APPENDIX B

SAMPLE TABLES AND FORMS

TABLE B-3 - SAMPLING EVENT RECORDS

DATE OF SAMPLED	OUTFALL SAMPLED	ANALYSIS PERFORMED	ANALYSIS METHOD	SAMPLING TEAM

**STORMWATER POLLUTION
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APPENDIX B

SAMPLE TABLES AND FORMS

TABLE B-4 - MAINTENANCE AND INSPECTION

INSPECTION/MAINTENANCE CONDUCTED & COMMENTS OBSERVATIONS	LOCATION/ EQUIPMENT	CONDUCTED BY	DATE

**STORMWATER POLLUTION
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S. LANCASTER. MASSACHUSETTS**

APPENDIX B

SAMPLE TABLES AND FORMS

TABLE B-5 - DRAINAGE SYSTEM MAINTENANCE AND INSPECTION

OUTFALL	CONDITION	DISCHARGE PRESENT	FOLLOW-UP	INSPECTOR

**STORMWATER POLLUTION
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APPENDIX B

SAMPLE TABLES AND FORMS

TABLE B-6 - EMPLOYEE TRAINING SCHEDULE

WORKSHOP TOPIC	DATES	PERSONNEL ATTENDING

APPENDIX C

**STORMWATER POLLUTION
PREVENTION PLAN
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APPENDIX C

PHOTOGRAPHS



**Photo No. 1
Outfall No. 1**

**McPherson Design
C-1**

**STORMWATER POLLUTION
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APPENDIX C

PHOTOGRAPHS



**Photo No. 2
Outfall No. 3**

**STORMWATER POLLUTION
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APPENDIX C

PHOTOGRAPHS



**Photo No. 3
Outfall No. 4**

**STORMWATER POLLUTION
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APPENDIX C

PHOTOGRAPHS



**Photo No. 4
Diesel Fuel Tank by Kiln Building**

**STORMWATER POLLUTION
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CULPEPER OF NEW ENGLAND, LLC
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APPENDIX C

PHOTOGRAPHS



**Photo No. 5
Diesel Fuel Tank in Boiler Room**

**STORMWATER POLLUTION
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CULPEPER OF NEW ENGLAND, LLC
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APPENDIX C

PHOTOGRAPHS



**Photo No. 6
Storm Drain**

Culpeper of New England, LLC
Storm Water Pollution Prevention Plan

Inspection/Action Documentation Form

Date of Action: 4-12-22 Time of Day: 8:05 AM

Name of person performing the inspection or taking action:

Michael Nuzzo/1/0

Name of person filling out this report:

Michael Nuzzo/1/0

Infiltration Point ID, Outfall or other location description:

Out Fall #3 Storm Drain, Both Clean of ANY Debris

Describe the inspection or action (more than one might apply):

- ☒ Monthly facility inspection
- ☒ Inspect sheet flow areas for obstructions or debris
- ☒ Clean sheet flow areas
- ☒ Inspect trench drains, drywells, detention basin, pond, or infiltration trench inlets for obstructions or debris
- ☒ Clean inlets
- ☒ Training (Describe type of training and persons trained in space provided below)
- ☒ Annual dry weather flow monitoring (after at least 3 consecutive days of no precipitation)
 - ☒ No **NON-storm** water flows to the storm water drainage systems were identified
 - ☐ A **NON-storm** water flow was discovered (discuss below, further action is required)
- ☐ Other (describe)

I and my Yard Foreman go thru 3 clean-up & maintenance of the outfall areas, Replacement of Hay bails etc, we also clean up any debris from the Fall & winter.

Culpeper of New England, LLC
Storm Water Pollution Prevention Plan

Annual Compliance Evaluation Report

Date of Action: 4-12-22 Time of Day: 10:18 AM

Name of person performing the inspection or taking action:

Inspectors should look for but are not limited to:

- ☒ Industrial materials, residue or trash that could contaminate stormwater,
- ☒ Leaks or spills from industrial equipment, drums, barrels, tanks or similar containers,
- ☒ Unauthorized non-stormwater discharges (or unidentified allowable discharges),
- ☒ Off-site tracking of industrial materials or sediment where vehicles enter or exit the site,
- ☒ Migrating of raw, final, or waste materials from areas of no exposure to exposed areas,
- ☒ Evidence of or potential for pollutants to enter the drainage system,
- ☒ Evidence that all BMP's are operating correctly,
- ☒ Evidence, at each discharge location, that BMP's are effective in preventing pollutants from contaminating stormwater discharges.

Observations:

- ☐ Location(s) of discharge of pollutants from the site OUT Fall # 3
- ☐ Location(s) of BMP's that need to be maintained SAME as above outfall #3
- ☐ Location(s) of BMP's that failed to operate or are inadequate #5 1, 2, 3, 4 OUTFALLS
- ☐ Location(s) where additional BMP's are needed NONE
- ☐ Identify any incidents of noncompliance NONE
- ☐ Other: AS stated # 1, 2, 3, 4 Don't ALWAYS Produce Storm Water.

If no noncompliance items were identified by this inspection, a signature of the following certification statement shall certify that the facility is in compliance with the SWPPP and the SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (GP-0-17-004).

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 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: Michael Nuzzo Title: General Manager
Signature: Michael Nuzzo Date: 4-12-22

Culpeper of New England, LLC
Storm Water Pollution Prevention Plan

Inspection/Action Documentation Form

Date of Action: 5-18-21 Time of Day: 1:00 P.M

Name of person performing the inspection or taking action:

Michael Nuzzo/i/o

Name of person filling out this report:

Michael Nuzzo/i/o

Infiltration Point ID, Outfall or other location description:

OUTFALL #1 3 3 3 Storm Drain

Describe the inspection or action (more than one might apply):

- ☒ Monthly facility inspection
- ☒ Inspect sheet flow areas for obstructions or debris
- ☒ Clean sheet flow areas
- ☒ Inspect trench drains, drywells, detention basin, pond, or infiltration trench inlets for obstructions or debris
- ☒ Clean inlets
- ☐ Training (Describe type of training and persons trained in space provided below)
- ☒ Annual dry weather flow monitoring (after at least 3 consecutive days of no precipitation)
 - No **NON-storm** water flows to the storm water drainage systems were identified
 - A **NON-storm** water flow was discovered (discuss below, further action is required)
- ☐ Other (describe)

All outfalls will need maintenance 3 will be looking
to outsource to professionals to update 3 rework. This
may take time due to current Covid restrictions.
There were changes made to the SWPPP report
photo #4 on page C-4 has been sold 3 removed
from site.

Culpeper of New England, LLC
Storm Water Pollution Prevention Plan

Annual Compliance Evaluation Report

Date of Action: 5-18-21 Time of Day: 2:46 P.M

Name of person performing the inspection or taking action:

Inspectors should look for but are not limited to:

- ☒ Industrial materials, residue or trash that could contaminate stormwater,
- ☒ Leaks or spills from industrial equipment, drums, barrels, tanks or similar containers,
- ☐ Unauthorized non-stormwater discharges (or unidentified allowable discharges),
- ☐ Off-site tracking of industrial materials or sediment where vehicles enter or exit the site,
- ☐ Migrating of raw, final, or waste materials from areas of no exposure to exposed areas,
- ☐ Evidence of or potential for pollutants to enter the drainage system,
- ☒ Evidence that all BMP's are operating correctly,
- ☒ Evidence, at each discharge location, that BMP's are effective in preventing pollutants from contaminating stormwater discharges.

Observations:

- ☐ Location(s) of discharge of pollutants from the site OUT FILL # 1 3 3
- ☐ Location(s) of BMP's that need to be maintained All Need Maintenance From winter
- ☐ Location(s) of BMP's that failed to operate or are inadequate OUT FILL # 4 gets NO RUNOFF
- ☐ Location(s) where additional BMP's are needed NONE
- ☐ Identify any incidents of noncompliance OUT FILL # 4 the stormwater Discharge into the ground
- ☐ Other: _____

If no noncompliance items were identified by this inspection, a signature of the following certification statement shall certify that the facility is in compliance with the SWPPP and the SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (GP-0-17-004).

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 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: Michael Nuzzolillo Title: General Manager

Signature: Michael Nuzzolillo Date: 5-18-21

Culpeper of New England, LLC
Storm Water Pollution Prevention Plan

Inspection/Action Documentation Form

Date of Action: 4-29-20 Time of Day: 2:37 P.M

Name of person performing the inspection or taking action:

Michael NUZZO/1/0

Name of person filling out this report:

Michael NUZZO/1/0

Infiltration Point ID, Outfall or other location description:

outfalls # 1, 2, 3 3 stormdrain

Describe the inspection or action (more than one might apply):

- ☒ Monthly facility inspection
- ☒ Inspect sheet flow areas for obstructions or debris
- ☒ Clean sheet flow areas
- ☒ Inspect trench drains, drywells, detention basin, pond, or infiltration trench inlets for obstructions or debris
- ☒ Clean inlets
- ☐ Training (Describe type of training and persons trained in space provided below)
- ☒ Annual dry weather flow monitoring (after at least 3 consecutive days of no precipitation)
 - ☒ No **NON-storm** water flows to the storm water drainage systems were identified
 - ☐ A **NON-storm** water flow was discovered (discuss below, further action is required)
- ☐ Other (describe)

I MYSELF am the ONLY PERSON who takes sample's
For this location, I have 1 person who works
here 3 help with clean-up from Fall 3 winter. we
go thru 3 replace All HAY bails from the winter 3
clean-up All Debris in and around out fall area's,

Culpeper of New England, LLC
Storm Water Pollution Prevention Plan

Annual Compliance Evaluation Report

Date of Action: 5-2-2020 Time of Day: 9:22 A.M

Name of person performing the inspection or taking action: Michael Nuzzopilo

Inspectors should look for but are not limited to:

- ☒ Industrial materials, residue or trash that could contaminate stormwater,
- ☒ Leaks or spills from industrial equipment, drums, barrels, tanks or similar containers,
- ☒ Unauthorized non-stormwater discharges (or unidentified allowable discharges),
- ☒ Off-site tracking of industrial materials or sediment where vehicles enter or exit the site,
- ☒ Migrating of raw, final, or waste materials from areas of no exposure to exposed areas,
- ☒ Evidence of or potential for pollutants to enter the drainage system,
- ☒ Evidence that all BMP's are operating correctly,
- ☒ Evidence, at each discharge location, that BMP's are effective in preventing pollutants from contaminating stormwater discharges.

Observations:

- ☐ Location(s) of discharge of pollutants from the site #3 outFall
- ☐ Location(s) of BMP's that need to be maintained #1, 2, 3, 3 outFall's #4 No generation.
- ☐ Location(s) of BMP's that failed to operate or are inadequate #4
- ☐ Location(s) where additional BMP's are needed will discuss with Project Manager
- ☐ Identify any incidents of noncompliance #4 outFall DOESN'T Produce due to location.
- ☐ Other: _____

If no noncompliance items were identified by this inspection, a signature of the following certification statement shall certify that the facility is in compliance with the SWPPP and the SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (GP-0-17-004).

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 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: Michael Nuzzopilo Title: General Manager
Signature: Michael Nuzzopilo Date: 5-2-2020

Exhibit 6
Annual Report – January 28, 2021

NPDES FORM 6100-28		UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0300
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Permit Information

Report Year: 2021
Reporting Period: 1/1/2021 to 12/31/2021
NPDES ID: MAR05J04L

Facility Information

Facility Name: CULPEPER WOOD PRESERVERS

Facility Point of Contact
First Name Middle Initial **Last Name:** MICHAEL NUZZOLILO
Phone: 978-368-7667 **Ext.:** _____
Email: mnuzzolilo@culpeperwood.com

Facility Mailing Address
Address Line 1: 840 STERLING ROAD
Address Line 2: _____ **City:** LANCASTER
ZIP/Postal Code: 01561 **State:** MA
County or Similar Division: Worcester

General Findings

Provide a summary of your past year's routine facility inspection documentation, including dates (see Part 3.1.6 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.9 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2021." (Note: Operators of airport facilities that are complying with Part 8.S.9 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

ROUTINE FACILITY INSPECTIONS WERE CONDUCTED MONTHLY AS REQUIRED FOR FACILITIES IN SECTOR A2 ON THE FOLLOWING DATES: 1/27/21, 2/4/21, 3/23/21, 4/22/21, 5/12/21, 6/23/21, 7/28/21, 8/16/21, 9/7/21, 10/11/21, 11/16/21, 12/9/21. AT LEAST ONE INSPECTION (7/28/21 AND 10/11/21) WERE CONDUCTED DURING RAIN EVENTS AS REQUIRED BY THE MSGP. SCHEDULED REPLACEMENT OF HAY BALES FOR SEDIMENT CONTROL WERE ALSO DONE CONCURRENTLY WITH EACH INSPECTION.

THE FACILITY'S PRIMARY STORMWATER POLLUTION CONTROL STRATEGY INVOLVES MANAGEMENT PRACTICES FOR PREVENTING WOOD TREATING SOLUTION FROM CONTACTING STORMWATER BY ALLOWING PRODUCT TO DRY IN A ROOFED AREA WITH SECONDARY CONTAINMENT BEFORE MOVING IT INTO THE STORAGE YARD; THOSE MANAGEMENT PRACTICES WERE FOUND TO BE OPERATING EFFECTIVELY DURING EACH INSPECTION. DURING SOME INSPECTIONS PERSONNEL OBSERVED THAT STORMWATER AT THE SOUTH EDGE OF THE PLANT HAD FLOWED AROUND THE HAY BALES IN PLACE FOR SEDIMENT CONTROL AND FORMED A PUDDLE NEAR OUTFALL 003. THE FACILITY HAS INITIATED A CORRECTIVE ACTION TO REGRADE THE AREA NEAR TH AT OUTFALL TO PREVENT STORMWATER FLOW FROM BYPASSING THE SEDIMENT CONTROLS. THAT CONSTRUCTION WORK IS SCHEDULED FOR SPRING 2022.

Provide a summary of your past year's quarterly visual assessment documentation, including dates (see Part 3.2.3 of the permit).

FOUR QUARTERLY VISUAL ASSESSMENTS WERE CONDUCTED ON THE FOLLOWING DATES: 3/23/21, 6/23/21, 9/7/21, 11/16/21. OUTFALLS 2 AND 3 WERE INSPECTED AS OUTFALLS 1 AND 4 HAVE NOT HAD SUFFICIENT FLOW FOR SAMPLING.

QUARTERLY VISUAL ASSESSMENTS NOTED THE PRESENCE OF SUSPENDED SOLIDS IN DISCHARGE AT OUTFALL 003; THIS IS BELIEVED TO BE THE RESULT OF STORMWATER THAT HAS BEEN OBSERVED FLOWING AROUND THE HAY BALES THAT ARE USED FOR SEDIMENT CONTROL. AS DESCRIBED ABOVE CORRECTIVE ACTIONS HAVE BEEN INITIATED TO ADDRESS THIS.

SOME QUARTERLY VISUAL ASSESSMENTS ALSO NOTED FOAM IN THE DISCHARGE. THIS LED TO THE FINDING THAT FORK TRUCKS ARE PERIODICALLY WASHED USING A SODIUM METASILICATE CLEANING SOLUTION AND THAT THE WASH WATER IS NOT AN AUTHORIZED NON-STORMWATER DISCHARGE UNDER THE MSGP. THAT DISCHARGE WAS DISCONTINUED IN NOVEMBER 2021, AND IF FORK TRUCKS ARE WASHED AGAIN IN THE FUTURE OPERATORS WILL BE INSTRUCTED TO COLLECT THE WASH WATER INSIDE THE FACILITY'S DESIGNED SECONDARY CONTAINMENT AREA TO AVOID A NON-STORMWATER DISCHARGE. FACILITY PERSONNEL REPORTED THAT THE FORK TRUCKS BEING WASHED HAD NOT CONTACTED WOOD TREATING SOLUTION SO NO TREATING SOLUTION WAS DISCHARGED.

Provide a summary of your past year's corrective action and/or additional implementation measures (AIM) documentation (See Part 5.3 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Note that you must modify your SWPPP based on the corrective actions and deadlines required under Part 5. Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

BENCHMARK EXCEEDANCES FOR COPPER HAVE BEEN IDENTIFIED DURING MONITORING AND THE FACILITY IS CURRENTLY IN TIER 2 OF ADDITIONAL IMPLEMENTATION MEASURES. THE FACILITY HAS INITIATED THE TRIAL IMPLEMENTATION OF STRUCTURAL CONTROLS FOR COPPER IN STORMWATER AND HAS CONTRACTED FOR THE INSTALLATION OF FILTER UNITS NEAR OUTFALL 003 USING SPECIALIZED SORPTIVE MEDIA FOR REMOVAL OF DISSOLVED COPPER. THE AREA NEAR THIS OUTFALL WILL ALSO BE REGRADED TO PREVENT STORMWATER FLOW FROM BYPASSING THE STRUCTURAL CONTROLS. CONSTRUCTION WORK IS SCHEDULED FOR SPRING 2022, FOLLOWED BY PERFORMANCE TESTING DURING THE COURSE OF A STORM EVENT TO EVALUATE THE EFFECTIVENESS OF THE STRUCTURAL CONTROL AND WHETHER USAGE OF SIMILAR SORPTIVE MEDIA IS WARRANTED FOR OTHER OUTFALLS.

AS DESCRIBED ABOVE THE FACILITY LEARNED OF AN UNAUTHORIZED NON-STORMWATER DISCHARGE FROM THE PERIODIC WASHING OF FORK TRUCKS THAT HAD NOT CONTACTED WOOD TREATING SOLUTION USING A SODIUM METASILICATE CLEANING SOLUTION. THAT DISCHARGE WAS DISCONTINUED IN NOVEMBER 2021. CULPEPER WOOD PRESERVERS IS OTHERWISE IN COMPLIANCE WITH THE MULTI-SECTOR GENERAL PERMIT.

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 have no personal knowledge that the information submitted is other than 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.

Certified By: Joshua J. Adkins

Certifier Title: EHS Director

Certifier Email: jadkins@culpeperwood.com

Certified On: 01/28/2022 10:42 AM ET