Stormwater Pollution Prevention Plan for the Luckey
Formerly Utilized Sites Remedial Action Program
Remediation Project

U.S. Army Corps of Engineers
Buffalo District, Buffalo, New York
Completion of Independent Technical Review

This document has been produced within the framework of the North Wind – Portage (NWP) quality management system. As such, an independent technical review (ITR), appropriate to the level of risk and complexity inherent in the project, has been conducted. This included review of assumptions (methods, procedures, and material used in analyses), alternatives evaluated; the appropriateness of data used and level of data obtained; and reasonableness of the results, including whether the product meets the project objectives. Comments and concerns resulting from review of the document have been addressed and corrected as necessary.

| ITR performed by: | [Redacted] |
| Signature:        | [Redacted] |
| Date:             | 11/21/19   |
### History of Revisions

<table>
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<tr>
<th>Revision</th>
<th>Issue Date</th>
<th>Action</th>
<th>Description</th>
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<tr>
<td>0</td>
<td>06/24/16</td>
<td>New document.</td>
<td>Initial Issue.</td>
</tr>
<tr>
<td>1</td>
<td>04/20/18</td>
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<td>To provide clarity and update site operations information.</td>
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<tr>
<td>2</td>
<td>06/28/18</td>
<td>Revise document.</td>
<td>Incorporation of stakeholder review comments.</td>
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<td>3</td>
<td>11/21/19</td>
<td>Revise document.</td>
<td>Incorporation of updated construction methods and erosion control measures/incorporation of stakeholder review comments.</td>
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ACRONYMS AND ABBREVIATIONS

AA   Administrative Area
AEC  Atomic Energy Commission
bgs  below ground surface
BMP  best management practice
CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
CGP  Construction General Permit
COC  constituent of concern
CRZ  Contamination Reduction Zone
CY   cubic yard(s)
ESA  Endangered Species Act
EZ   Exclusion Zone
ft   foot (feet)
FUSRAP Formerly Utilized Sites Remedial Action Program
HP   health physics
ITR  internal technical review
MS4  Municipal Separate Storm Sewer System
NOI  notice of intent
NPDES National Pollutant Discharge Elimination System
NWP  North Wind Portage
ODNR Ohio Department of Natural Resources
OEPA Ohio Environmental Protection Agency
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>PPE</td>
<td>personal protective equipment</td>
</tr>
<tr>
<td>sf</td>
<td>square foot/feet</td>
</tr>
<tr>
<td>SOP</td>
<td>Site Operations Plan</td>
</tr>
<tr>
<td>SOW</td>
<td>Final Scope of Work, Remediation of Soils Operable Unit, Luckey Site</td>
</tr>
<tr>
<td>SPCC</td>
<td>Spill Prevention, Control, and Countermeasure Plan</td>
</tr>
<tr>
<td>SSHO</td>
<td>site safety and health officer</td>
</tr>
<tr>
<td>SWPPP</td>
<td>Stormwater Pollution Prevention Plan</td>
</tr>
<tr>
<td>SZ</td>
<td>Support Zone</td>
</tr>
<tr>
<td>T&amp;E</td>
<td>threatened and endangered</td>
</tr>
<tr>
<td>TMDL</td>
<td>total maximum daily load</td>
</tr>
<tr>
<td>UFGS</td>
<td>Unified Facilities Guide Specification</td>
</tr>
<tr>
<td>USACE</td>
<td>United States Army Corps of Engineers</td>
</tr>
<tr>
<td>USEPA</td>
<td>United States Environmental Protection Agency</td>
</tr>
<tr>
<td>USFWS</td>
<td>U.S. Fish &amp; Wildlife Service</td>
</tr>
<tr>
<td>WMP</td>
<td>Water Management Plan</td>
</tr>
<tr>
<td>WMTDP</td>
<td>Waste Management, Transportation, and Disposal Plan</td>
</tr>
<tr>
<td>WWTP</td>
<td>wastewater treatment plant</td>
</tr>
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**INTRODUCTION**

This stormwater pollution prevention plan (SWPPP) addresses activities at the Luckey Formerly Utilized Sites Remedial Action Program (FUSRAP) site in Luckey, Ohio. The United States Army Corps of Engineers (USACE) – Buffalo District, selected North Wind Portage (NWP), under Contract Number W912P4-15-D-0006 (hereinafter referred to as the “contract”), to remediate the Luckey site. Remediation is being performed under FUSRAP, which was established to identify, investigate, and clean up or control sites previously used by the Atomic Energy Commission (AEC) and its predecessor, the Manhattan Engineer District. The Luckey site has been identified as having soils contaminated with FUSRAP-related constituents of concern (COCs), including beryllium, lead, radium-226, thorium-230, uranium-234, and uranium-238.

This SWPPP was prepared using the United States Environmental Protection Agency (USEPA) SWPPP template (USEPA 2012a), which is based on the USEPA 2012 Construction General Permit (USEPA 2012b), to meet substantive requirements of the Ohio Environmental Protection Agency (OEPA) Construction General Permit (CGP; OEPA 2019). Site activities will be performed in phases, and the SWPPP will be modified, as necessary, to reflect revised activities necessitated by changed conditions at the site (e.g., placement or relocation of measures based on activities being undertaken), and/or to reflect changes in the means and methods utilized for stormwater management as additional phases of work proceed.

At the completion of remediation activities, disturbed and backfilled areas will be graded to establish positive drainage, seeded, and covered with mulch or straw as appropriate for erosion control in order to return the site to its natural vegetative state. Changes in pre- and post-construction runoff conditions should be negligible. Temporary stormwater controls described in this SWPPP and subsequent revisions will control releases of pollutants to surface water conveyances near the site during site activities.
1. CONTACT INFORMATION/RESPONSIBLE PARTIES

1.1 Operator(s) / Subcontractor(s)

Operator(s): North Wind Portage, Inc.
Contact Address: 1075 South Utah Avenue, Suite 200
City, State, Zip: Idaho Falls, ID 83402
Contact Phone Number:
Fax:

1 – Subcontractor (SWPPP Inspections & Design Assistance):
Site Contractor: Civil & Environmental Consultants, Inc.
Contact Address: 4841 Monroe Street, Suite 103
City, State, Zip: Toledo, OH 43623
Contact Phone Number

2 – Subcontractor:
Site Contractor: Wood E&I
Contact Address: Lakeside Center, 1979 Lakeside Parkway, Suite 400
City, State, Zip: Tucker, GA 30084
Contact Phone Number

3 – Subcontractor:
Site Contractor: ARS Aleut Remediation
Contact Address: 2609 North River Road
City, State, Zip: Port Allen, LA 70767
Contact Phone Number

Emergency 24-Hour Contact:
Site Contractor: North Wind Portage, Inc.
Contact Name:
Contact Phone Number:
1.2 Stormwater Team

The Stormwater Team will consist of personnel responsible for the following activities:

- Inspections/Corrective Actions.
- Recordkeeping and Reporting.
- Development and Maintenance of the SWPPP.

Individuals responsible for these activities, along with their job titles and contact information, are listed in Appendix B – Emergency and Site Contacts List.
2. SITE EVALUATION, ASSESSMENT, AND PLANNING

2.1 Project/Site Information

Project Name and Address
Luckey FUSRAP Site
21200 Luckey Road
Luckey, OH 43443
Wood County

Project Latitude/Longitude
41°27'25.46"N  83°29'32.46"W
Method for determining latitude/longitude:
☐ USGS topographic map (specify scale: ____________)  ☐ EPA Web site  ☐ GPS
☒ Other (please specify): Google Earth

2.2 Discharge Information

Does your project/site discharge stormwater into a Municipal Separate Storm Sewer System (MS4)?  ☐ Yes  ☒ No
Are there any surface waters that are located within 50 feet of your construction disturbances?  ☒ Yes  ☐ No
Table 2-1. Names of receiving waters.

Name(s) of the first surface water that receives stormwater directly from your site and/or from the MS4.

1. Toussaint Creek

Table 2-2. Impaired waters/total maximum daily loads (TMDLs).

<table>
<thead>
<tr>
<th>Is this surface water listed as “impaired”?</th>
<th>What pollutant(s) are causing the impairment?</th>
<th>Has a TMDL been completed?</th>
<th>Title of the TMDL document</th>
<th>Pollutant(s) for which there is a TMDL</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ YES ☐ NO</td>
<td>Sediment, phosphorus</td>
<td>☒ YES ☐ NO</td>
<td>Total Maximum Daily Loads for the Toussaint River Watershed (OEPA 2006)</td>
<td>Phosphorus</td>
</tr>
</tbody>
</table>

Describe the method(s) you used to determine whether or not your project/site discharges to an impaired water: Referenced TMDL document.

Table 2-3. Tier 2, 2.5, or 3 waters (answer for each surface water listed in Table 2-2).

<table>
<thead>
<tr>
<th>Is this surface water designated as a Tier 2, Tier 2.5, or Tier 3 water?</th>
<th>If you answered yes, specify which Tier (2, 2.5, or 3) the surface water is designated as?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ YES ☒ NO</td>
<td>N/A</td>
</tr>
</tbody>
</table>
2.3 Site Maps

Figure A-1, located in Appendix A, shows the layout of the site, including the following:

- Boundaries of the property and the locations where construction will occur, including:
  - Locations where earth-disturbing activities may occur (i.e., remediation activities in Lagoons A, B, and C for Task Order 0003).
  - Locations where sediment, soil, or other construction materials may be stockpiled.
  - Locations of any crossings of surface waters.
  - Designated points on the site where vehicles will exit onto paved roads.
  - Locations of structures and other impervious surfaces previously constructed to be used during the remediation effort (e.g., concrete pads).
  - Locations of construction support activity areas.
  - Locations of potential pollutant-generating activities (e.g., equipment maintenance).

Figure A-2, also in Appendix A, shows the locations of surface water and drainage features, including the following:

- Locations of all surface waters, including wetlands.
- Topography of the site, existing vegetative cover (e.g., forest, pasture, pavement, structures), and drainage pattern(s) of stormwater and allowable non-stormwater flow onto, over, and from the site property before and after major grading activities.

Locations of planned stormwater control measures discussed in this SWPPP are depicted on drawings contained in Appendix C. Current drawings will be revised and/or additional drawings will be developed to illustrate stormwater controls specific to remediation work activities as work progresses on the Luckey FUSRAP site.

2.4 Nature of the Construction Activity

2.4.1 General Description of the Project

Site history, preparation, remediation, and project schedule are discussed in detail in the Site Operations Plan for the Luckey Formerly Utilized Sites Remedial Action Program Remediation Project (SOP; USACE 2017) and are summarized here. The Luckey FUSRAP site covers approximately 40 acres, and includes a large production building and warehouse, two abandoned railroad spurs, and several smaller process and support buildings. The area surrounding the site
to the west, north, and east is primarily residential farmland. From 1949 to the early 1960s, the Brush Beryllium Company, as a contractor to the AEC, used the Luckey site for beryllium processing to support the national defense program. Beryllium production activities brought different types of source media or potential contaminants to the site. Primary source media at the Luckey site included materials delivered for processing or re-processing: beryl ore from Africa and South America, scrap beryllium, and radiologically-contaminated scrap steel.

The USACE conducted a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) remedial investigation of the Luckey site under FUSRAP to characterize site conditions and to determine nature and extent of contamination, with the scope limited to addressing radioactivity, beryllium, and other constituents related to the production of beryllium at the Luckey site (USACE 2000). Through the subsequent CERCLA feasibility study, cleanup goals were identified and remedial action alternatives evaluated for the Luckey site (USACE 2003).

USACE identified six AEC-related COCs in impacted soils posing unacceptable risk to human health: beryllium, lead, radium-226, thorium-230, uranium-234, and uranium-238. The selected remedial action, as identified in the Luckey Site, Luckey, Ohio, Record of Decision for Soils Operable Unit, Final (USACE 2006), includes the excavation of impacted soils to achieve established cleanup goals for these COCs. Excavated soils above cleanup goals will be shipped offsite for disposal at a licensed/permitted disposal facility. NWP is the remediation contractor for the selected alternative.

This SWPPP presents the means and methods for stormwater management that will be implemented to complete remediation in accordance with USACE guidelines, and other applicable requirements as detailed herein. This SWPPP describes the overall plan for managing stormwater through mobilization, remediation, and restoration of the site and provides information required in accordance with the Final Scope of Work, Remediation of Soils Operable Unit, Luckey Site (SOW; USACE 2014). This SWPPP addresses specifics relative to Task Order 003 – Remediation of Lagoons A, B, and C. Current drawings in Appendix C will be revised as the plans for additional Phases of remediation are developed.

The predominant soil type is Hoytville clay loam. The mobilization area is overgrown with approximately 50% scrub vegetation coverage. Slopes are 0–1%, and the Natural Resources Conservation Service runoff class is “Negligible.” It is not anticipated that the mobilization, construction, or remediation activities will result in a net change in extent of impervious surfaces relative to preconstruction conditions.

Disturbed and backfilled areas will be graded to establish positive drainage, seeded, and covered with mulch or straw as appropriate for erosion control in order to return the site to its natural vegetative state at the completion of remediation activities. Changes in pre- and post-
construction runoff conditions are negligible. Temporary stormwater controls described in this SWPPP and subsequent revisions will control releases of pollutants to surface water conveyances during site activities.

The following sections briefly describe the existing surface conditions and proposed earth-disturbing activities at the site.

### 2.4.1.1 Mobilization

Initial mobilization activities were performed in late 2017 through early 2018 and are now completed. Earth-disturbing activities during mobilization included clearing and grubbing and installation of utilities and infrastructure, as described in the SOP (USACE 2017). Areas cleared include: the Administrative Areas (trailers and parking) (AA), Support Zones (equipment staging and transportation access) (SZ), Contamination Reduction Zones (CRZ), and Exclusion Zones (EZ) associated with remediation activities. These areas included planned stockpile and waste processing areas.

As required, vegetation was cleared and grubbed along the perimeter fence of the site in order to repair or replace fencing and to install perimeter air samplers and utilities.

### 2.4.1.2 Remediation of Lagoons A, B, & C

The general remediation plan will include excavating contaminated materials from Lagoons A, B, and C. Excavated material may be temporarily staged near the excavation area or transported directly to the Staging Pad or Loadout Pad. Materials may be processed for stabilization and/or moisture control using a stabilization product such as Calciment® prior to being packaged and transported for disposal.

Excavations will be managed to minimize surface water inflow and groundwater accumulations. The intent is to backfill excavations as soon as practical once it has been verified that cleanup goals have been obtained. In some instances, backfilling may be initiated concurrently with excavation, provided that the appropriate isolation measures (i.e. berms) are in place to prevent cross contamination between remediation work areas and the area(s) to be backfilled that have met established criteria allowing backfill to occur.

If surface water does flow into excavations or groundwater is encountered, accumulated water will be maintained within the excavation until dewatering methods can be utilized as described in Section 4.11.

#### 2.4.1.2.1 Lagoon A

Lagoon A extends from the west property line to approximately 600 feet east and from the south property line to approximately 700 feet north. Lagoon A includes a former laboratory building and foundations located south of the former production building. Surface water is conveyed
through an existing ditch that runs northwest from Lagoon A to Outfall No. 004 and discharges into the western drainage ditch along Luckey Road. Surface water then flows to Toussaint Creek. The anticipated depths of excavation may reach 6 feet below ground surface (bgs). The anticipated volume for removal based on the USACE 50% probability contour and historic lagoon footprint is 3,293 cubic yards (CY).

2.4.1.2.2 Lagoon B
Lagoon B extends from 600 feet east of the west property line to approximately 1,000 feet east of the west property line (400 feet total) and from the south property line to approximately 700 feet north. Lagoon B includes foundations south of the former production building and an existing swale/shallow ditch that runs northeast, through an existing culvert, to Outfall No. 007, which discharges north into the main drainage ditch. Surface water then flows to Toussaint Creek. The anticipated depths of excavation may reach 16 feet bgs. The anticipated volume for removal based on the USACE 50% probability contour and historic lagoon footprint is 11,589 CY.

2.4.1.2.3 Lagoon C
Lagoon C extends from 1,000 feet east of the west property line to the east property line and from the south property line to approximately 700 feet north. Lagoon C includes the existing railroad spurs and ditch that runs west, through an existing culvert, to Outfall No. 007, which discharges north into the main drainage ditch. Surface water then flows to Toussaint Creek. The anticipated depths of excavation may reach 10 feet bgs in isolated areas. The anticipated volume for removal based on the USACE 50% probability contour and historic lagoon footprint is 6,736 CY.

2.4.1.3 Trenches (T1 through T7)
Trenches 1 through 7 and Lagoon D are located north of Lagoon C and drain north to the main drainage ditch. Surface water then flows to Toussaint Creek. Remediation activities in these areas on the Luckey FUSRAP site are anticipated to occur in the future. At the time of publication of this SWPPP, the remediation activities associated with these areas have not been developed. As such this SWPPP, as presented, does not include details pertaining to trench remediation activities.

2.4.1.4 Main Drainage Ditch (D1)
The main drainage ditch runs north through the trench areas. Surface water then flows to Toussaint Creek. Remediation activities in this area on the Luckey FUSRAP site is anticipated to occur in the future. At the time of publication of this SWPPP, the remediation activities associated with this area has not been developed. As such this SWPPP, as presented, does not include details pertaining to main drainage ditch remediation activities.
2.4.1.5 Building Demolition
Demolition of selected existing buildings on the Luckey FUSRAP site is anticipated to occur in the future. At the time of publication of this SWPPP, remediation activities associated with demolition of the buildings have not been developed. As such this SWPPP, as presented, does not include details pertaining to building demolition activities.

2.4.1.6 Demobilization
Demobilization activities on the Luckey FUSRAP site are anticipated to occur in the future. At the time of publication of this SWPPP, demobilization activities have not fully developed. As such this SWPPP, as presented, does not include details pertaining to demobilization activities.

2.4.2 Size of Construction Project
The Luckey FUSRAP site covers approximately 40 acres, with areas of soil disturbance for mobilization anticipated to be:

- Total area of S-1 mobilization area:
  ±185,500 square feet (sf) = 4.26 acres
  Perimeter: 2,333 ft

- Total area of support zone, including parking, trailers, etc.:
  ±320,000 sf = 7.35 acres

Phase III – Remediation activities will involve the excavation of contaminated soils from three former lagoons (Lagoons A, B, and C), with estimated areas of soil disturbance anticipated as, based on the USACE 50% probability contour and historic lagoon footprint:

- Lagoon A – 41,995 sf
- Lagoon B – 70,538 sf
- Lagoon C – 130,840 sf

Total area – 243,373 sf = 5.59 acres

Remediation activities in other portions of the site, as described above, have not yet been developed, and is not included in the total project area.
2.5 List of Allowable Non-Stormwater Discharges Present at the Site

Table 2-4. List of allowable non-stormwater discharges present at the site.

<table>
<thead>
<tr>
<th>Type of Allowable Non-Stormwater Discharge</th>
<th>Likely to be Present at Your Site?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discharges from emergency fire-fighting activities</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Fire hydrant flushings</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Landscape irrigation</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Waters used to wash vehicles and equipment</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Water used to control dust</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Potable water including uncontaminated water line flushings</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Routine external building washdown</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Pavement wash waters</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Uncontaminated air conditioning or compressor condensate</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Uncontaminated, non-turbid discharges of ground water or spring water</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Foundation or footing drains</td>
<td>YES  NO</td>
</tr>
<tr>
<td>Construction dewatering water</td>
<td>YES  NO</td>
</tr>
</tbody>
</table>

A tire wash unit may be used to remove loose sediment from trucks leaving the project site to prevent track-out. Water used in the tire wash unit will be captured and reused or disposed of at the onsite wastewater treatment plant (WWTP). Water will be applied to control dust during clearing and grubbing, on the soil stockpiles, or whenever visible dust is observed, as needed. This same approach will be utilized during the remediation phase of the project, as appropriate. Uncontaminated air-conditioning condensate will be allowed to discharge to the ground adjacent to the laboratory and office trailers. Water management practices are discussed in Section 4.11.
3. DOCUMENTATION OF COMPLIANCE WITH OTHER FEDERAL REQUIREMENTS

3.1 Endangered Species Protection

Eligibility Criterion
Under which criterion listed in Appendix D of the USEPA CGP are you eligible for coverage under this permit?

- [ ] A
- [ ] B
- [ ] C
- [ ] D
- [ ] E
- [ ] F

For reference purposes, the eligibility criteria listed in Appendix D of the USEPA CGP are as follows:

Criterion A. No federally-listed threatened or endangered species or their designated critical habitat(s) are likely to occur in your site’s “action area” as defined in Appendix A of this permit.

Criterion B. The construction site’s discharges and discharge-related activities were already addressed in another operator’s valid certification of eligibility for your action area under eligibility Criterion A, C, D, E, or F and there is no reason to believe that federally-listed species or federally-designated critical habitat not considered in the prior certification may be present or located in the “action area”. To certify your eligibility under this Criterion, there must be no lapse of National Pollutant Discharge Elimination System (NPDES) permit coverage in the other operator’s certification. By certifying eligibility under this Criterion, you agree to comply with any effluent limitations or conditions upon which the other operator’s certification was based. You must include in your Notice of Intent (NOI) the tracking number from the other operator’s notification of authorization under this permit. If your certification is based on another operator’s certification under Criterion C, you must provide USEPA with the relevant supporting information required of existing dischargers in Criterion C in your NOI form.
Criterion C. Federally-listed threatened or endangered species or their designated critical habitat(s) are likely to occur in or near your site’s “action area,” and your site’s discharges and discharge-related activities are not likely to adversely affect listed threatened or endangered species or critical habitat. This determination may include consideration of any stormwater controls and/or management practices you will adopt to ensure that your discharges and discharge-related activities are not likely to adversely affect listed species and critical habitat. To make this certification, you must include the following in your NOI: 1) any federally listed species and/or designated habitat located in your “action area”; and 2) the distance between your site and the listed species or designated critical habitat (in miles). You must also include a copy of your site map with your NOI.

Criterion D. Coordination between you and the Services has been concluded. The coordination must have addressed the effects of your site’s discharges and discharge-related activities on federally-listed threatened or endangered species and federally-designated critical habitat, and must have resulted in a written concurrence from the relevant Service(s) that your site’s discharges and discharge-related activities are not likely to adversely affect listed species or critical habitat. You must include copies of the correspondence between yourself and the Services in your SWPPP and your NOI.

Criterion E. Consultation between a Federal Agency and the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service under section 7 of the Endangered Species Act (ESA) has been concluded. The consultation must have addressed the effects of the construction site’s discharges and discharge-related activities on federally-listed threatened or endangered species and federally-designated critical habitat. The result of this consultation must be either:

i. a biological opinion that concludes that the action in question (taking into account the effects of your site’s discharges and discharge-related activities) is not likely to jeopardize the continued existence of listed species, nor the destruction or adverse modification of critical habitat; or
ii. written concurrence from the applicable Service(s) with a finding that the site’s discharges and discharge-related activities are not likely to adversely affect federally-listed species or federally-designated habitat.

You must include copies of the correspondence between yourself and the Services in your SWPPP and your NOI.
Criterion F. Your construction activities are authorized through the issuance of a permit under section 10 of the ESA, and this authorization addresses the effects of the site’s discharges and discharge-related activities on federally-listed species and federally-designated critical habitat. You must include copies of the correspondence between yourself and the Services in your SWPPP and your NOI.

Supporting Documentation
Provide documentation for the applicable eligibility criterion you select in Appendix D of the USEPA CGP, as follows:

For Criterion A, indicate the basis for your determination that no federally-listed threatened or endangered species or their designated critical habitat(s) are likely to occur in your site’s action area (as defined in Appendix A of the USEPA CGP). Check the applicable source of information you relied upon:

- [ ] Specific communication with staff of the USFWS or National Marine Fisheries Service.
- [ ] Publicly available species list.

The USFWS and the Ohio Department of Natural Resources (ODNR) were contacted in 1997 regarding the presence of federal- and state-listed threatened and endangered (T&E) species (USACE 2000). The USFWS noted that the Luckey site is located within the range of one federally-listed endangered species, the Indiana bat (*Myotis sodalis*). USFWS noted that no impact to this species is expected from activities at the facility. ODNR did not identify any rare species in the area near the site.

The USFWS and ODNR were contacted again in 2000 regarding the presence of federal- and state-listed T&E species (USACE 2000). These agencies were requested to provide records for T&E species in all United States Geologic Survey quadrangles within 5 miles of the Luckey site and in Toussaint Creek downstream of the Luckey site to Lake Erie. These quadrangles included Rossford, Walbridge, Dunbridge, Pemberville, Elmore, Genoa, Oak Harbor, and Lacarne. The USFWS again noted that the Luckey site is located within the range of one federally-listed endangered species, the Indiana bat. USFWS also noted that the Luckey site lies within the range of the one federally-listed threatened species, the bald eagle (*Haliaeetus leucocephalus*). The Luckey site does not provide adequate foraging habitat until far downstream near Lake Erie.

ODNR identified state T&E and rare species records in Dunbridge, Pemberville, Oak Harbor, and Lacarne quadrangles. The Luckey site is very unlikely to have any impact to T&E species.
identified in the Dunbridge and Pemberville quadrangles due to the distance to these recorded locations and the absence of any surface water connection. The state T&E species identified in the Oak Harbor and Lacarne quadrangles are located at the far downstream end of Toussaint Creek near Lake Erie. The Luckey site has the potential to impact these receptors due to the surface water connection with Toussaint Creek; however, this potential is considered rather small due to the distance (more than 20 miles) between these species locations and the Luckey site (USACE 2000.)

3.2 Historic Preservation

Appendix E, Step 1
Do you plan on installing any of the following stormwater controls at your site? Check all that apply below, and proceed to Appendix E of the USEPA CGP, Step 2.

☐ Dike
☒ Berm
☐ Catch Basin
☐ Pond
☒ Stormwater Conveyance Channel (e.g., ditch, trench, perimeter drain, swale, etc.)
☒ Culvert
☐ Other type of ground-disturbing stormwater control:

Appendix E, Step 2
If you answered yes in Step 1, have prior surveys or evaluations conducted on the site already determined that historic properties do not exist, or that prior disturbances at the site have precluded the existence of historic properties? ☒ YES  ☐ NO

3.3 Safe Drinking Water Act Underground Injection Control Requirements

Do you plan to install any of the following controls? Check all that apply below.

No.

- Infiltration trenches (if stormwater is directed to any bored, drilled, driven shaft or dug hole that is deeper than its widest surface dimension, or has a subsurface fluid distribution system)

- Commercially manufactured pre-cast or pre-built proprietary subsurface detention vaults, chambers, or other devices designed to capture and infiltrate stormwater flow

- Drywells, seepage pits, or improved sinkholes (if stormwater is directed to any bored, drilled, driven shaft or dug hole that is deeper than its widest surface dimension, or has a subsurface fluid distribution system)
4. EROSION AND SEDIMENT CONTROLS

Revision 3 of this SWPPP specifically addresses the means and methods applicable to remediation activities for the Lagoon work areas (Lagoons A, B, and C) and ongoing site activities.

4.1 Natural Buffers or Equivalent Sediment Controls

The western drainage ditch is within 50 ft of the AA; therefore, means of erosion protection/sediment control as approved by the USACE may be installed on the west side of the existing parking lot. As future remediation activities progress, the SWPPP will be revised, as necessary, to address the associated activities (excavations, site structure modifications, etc.) and will include natural buffers and sediment controls for disturbances within 50 ft of surface waters.

4.1.1 Buffer Compliance Alternatives

Are there any surface waters within 50 feet of your project’s earth disturbances?

☑ YES ☐ NO

The western drainage ditch is within 50 ft of the AA where clearing and grubbing activities described in the SOP (USACE 2017) will occur.

4.1.2 Buffer Exceptions

Which of the following exceptions to the buffer requirements applies to your site?

☑ There is no discharge of stormwater to the surface water that is located 50 feet from my construction disturbances.

☑ No natural buffer exists due to preexisting development disturbances that occurred prior to the initiation of planning for this project.

(Note: If this exception applies, no further documentation is required for section 4.1 of the Template.)

The AA adjoining the western drainage ditch is a paved parking lot; therefore, no natural buffer exists due to preexisting development.

4.2 Perimeter Controls

Where deemed appropriate, NWP will install silt fencing or other appropriate erosion control measures, such as filter socks, according to the manufacturer’s specifications and Unified Facilities Guide Specification (UFGS) 01 57 23 (provided in the SOW [USACE 2014]) north of the Loadout Pad work area (S1 area) and around the office trailer/equipment storage yard area.
(Figure A-1) perimeters. Some perimeter clearing and grubbing may be required prior to installation of silt fencing and/or other erosion and sediment controls.

Silt fencing and/or other erosion and sediment controls will initially be installed at the locations shown in Appendix C – SWPPP Drawings. The drawings depict current site conditions after mobilization and initial clearing and grubbing efforts to begin remediation activities in Lagoons A, B, and C. Similar controls will be utilized during future remediation phases of the project. Silt fencing specifications are included within the General Notes in Appendix C. Product submittals demonstrating compliance or equivalency to the approved materials will be provided when deemed necessary.

**Installation.** Erosion and sediment controls will be installed prior to earth-disturbing activities.

**Maintenance.** Erosion and sediment controls will be inspected at least weekly or after a precipitation event, as described in Section 6. Maintenance requirements are included with the product specifications. Any required repairs will be made promptly. Sediment will be removed and taken to the Loadout Pad or Staging Pad once it reaches one-third the height of the control measure. Erosion and sediment controls will be removed when final stabilization of disturbed areas has been completed.

### 4.3 Sediment Track-Out

#### 4.3.1 General

The site entry and existing parking areas west of the S-1 area (Figure A-1) are paved, thereby reducing track-out from the SZ onto Luckey Road. A decontamination pad between the CRZ and the EZ (Figure A-1) will effectively remove all site contaminants, including sediment, eliminating track-out between the EZ and the CRZ. A truck wheel wash will be installed along the interior haul route (Figure A-1) to further reduce sediment track-out from the site.

#### 4.3.2 Specific Track-Out Controls

##### 4.3.2.1 Paved Site Entry

The site entry and employee parking area/equipment storage yard area will be paved under this Phase of work, thereby reducing track-out from these areas. Excessively dirty vehicles or equipment will be rejected from entering the site. These items will be sent offsite for cleaning before access to the site. Contaminated vehicles and equipment exiting the EZ will be decontaminated before release to the SZ.

**Installation.** Rehabilitation of the existing pavement by installing new asphalt paving is proposed under this Phase of work. If this work does not occur, no new installation work is proposed under
this Phase of work; however, ongoing maintenance (e.g., filling pot holes) will be performed as necessary.

Maintenance. In the unlikely event that visible sediment has been tracked out from the site onto the surface of offsite streets, other paved areas, or sidewalks, NWP will remove the deposited sediment by the end of the same workday in which the track-out occurs. Any track-out will be removed by shoveling, vacuuming, or other, similarly effective means of sediment removal. Tracked-out sediment from clean areas will not be hosed or swept into any stormwater conveyance unless it is connected to a sediment basin, sediment trap, or similarly effective control.

4.3.2.2 Decontamination Pad

The decontamination pad was constructed in accordance with the SOP (USACE 2017) and allows for the containment and transfer of collected water to the onsite WWTP. Wastewater will be managed in accordance with the Water Management Plan for the Luckey Formerly Utilized Sites Remedial Action Program Remediation Project (WMP; USACE 2018a) and will either be reused post-treatment for dust suppression or discharged offsite in accordance with the WMP. At times, collected wastewater may be shipped offsite to an approved treatment/disposal facility in accordance with the Waste Management, Transportation, and Disposal Plan for the Luckey Formerly Utilized Sites Remedial Action Program Remediation Project (WMTDP; USACE 2018b).

Installation. Decontamination pad installation was completed under the mobilization Phase of work; therefore, no new work is expected under this Phase.

Maintenance. The decontamination pad will be inspected at least weekly for condition and integrity. The trench drain will be inspected daily when performing decontamination activities and cleaned as necessary to facilitate ongoing collection of wastewater.

4.3.2.3 Truck Wheel Wash

A truck wheel wash will be constructed along the haul route for offsite shipments, just prior to the paved site entry. The truck wheel wash will be used to rinse loose sediment collected from the haul route from the truck and trailer tires prior to tracking onto the paved site entry apron. The truck wheel wash will be a self-contained system that allows for the collection of rinse water for reuse and for the collection of sediment for disposal.

Installation. Installation of the truck wheel wash is proposed under this Phase of work. If this work does not occur, no new installation work is proposed under this Phase of work; however, ongoing maintenance (e.g., cleanup of track-out) will be performed as necessary.
Maintenance. The truck wheel wash will be inspected daily when traffic is being directed to utilize the equipment. The equipment will be stored during freezing weather conditions. When necessary, water may be conveyed to the onsite WWTP for processing or shipped offsite for disposal in order to replace the supply. Collected sediment will be removed and taken to the Loadout Pad or Staging Pad when necessary.

### 4.4 Stockpiled Sediment or Soil

#### 4.4.1 General

Stockpiles may be constructed on the Loadout Pad and Staging Pad (Figure A-1) to support remediation activities. The Loadout Pad and Staging Pad were constructed under the mobilization Phase. These pads are constructed of concrete and include trench drains to collect sediment and convey wastewater to the WWTP for treatment. The stockpiles will be monitored daily and may be covered or sprayed with a chemical fixative during weekends and holidays as deemed necessary. Additional stockpiles may be constructed within the remediation work areas (Lagoons A, B, and C) to support remediation activates. Use of covers or chemical fixative options for additional unplanned stockpiles will be evaluated as needed. Refer to Section 4.5 for details.

Installation. Stockpiles will be generated as necessary during the remediation activities.

Maintenance. Stockpile areas (including the sediment controls) will be inspected weekly or after a precipitation event and repaired as necessary.

#### 4.4.2 Specific Stockpile Controls

##### 4.4.2.1 Perimeter Berms (Soil and Stone)

Perimeter berms may be constructed around stockpiles to ensure runoff control of sediment when deemed necessary. Berms may be constructed utilizing materials from the previous ScanSortSM process that meet place-back criteria. Berms may also be constructed utilizing offsite general import fill or stone materials.

Installation. Stockpile berm locations will be determined on an as-needed basis, as stockpiles are constructed.

Maintenance. Perimeter berms will be inspected weekly or after a precipitation event and will be repaired promptly and maintained as indicated on the drawings in Appendix C of this SWPPP.

##### 4.4.2.2 Silt Fence

Silt fence and/or other erosion and sediment controls may be installed around the stockpiles if deemed appropriate to control the spread of contaminants and to reduce the risks of sediment
leaving the site. Specific requirements relative to the installation of control measures are provided in Section 4.2.

Installation. Stockpile erosion and sediment control locations will be determined on an as-needed basis, as stockpiles are constructed.

Maintenance. Erosion and sediment controls will be inspected at least weekly, as described in Section 6. Any required repairs will be made promptly and sediment will be removed and taken to the Loadout Pad or Staging Pad once it reaches one-third the height of the control measure. Erosion and sediment controls may be removed once stockpiles are removed.

4.5 Minimize Dust

4.5.1 General

Dust control is performed based on approval by the USACE contracting officer, per Section 3.4.4 of UFGS 01 50 00 of the SOW (USACE 2014). NWP will use a clean-water truck as the primary means of controlling dust on the haul road and in the AA. A separate water truck will be utilized in the EZ, CRZ, and other remediation work areas. The water truck will be supplied using treated effluent water from the WWTP, with water from the East Production Well, or with municipal water as needed. A chemical fixative may also be used for dust control or long-term stabilization.

4.5.2 Specific Dust Controls

4.5.2.1 Water Spray

Water spray will be applied to control generation of visible dust on haul roads, haul routes, soil processing areas, during clearing and grubbing, and during remediation activities, as deemed necessary. Only water from approved sources noted in Section 4.5.1 may be applied.

Installation. Use of water spray will begin with mobilization and will continue for the duration of project activities, as needed.

Maintenance. Water will be applied as necessary based on the judgment of the site superintendent or his designee.

4.5.2.2 Fixative

An environmentally friendly chemical fixative may be used for dust control. In determining need, use of the selected chemical fixative will be evaluated for effectiveness compared to use of only water in specific instances, such as during colder periods or for longer-term control of dust and/or erosion and sediment control. Details on the chemical fixative can be found in the General Notes in Appendix C.
Installation. Use of the chemical fixative may begin with mobilization and continue for the duration of project activities, as needed.

Maintenance. Chemical fixative may be applied as necessary based on the judgment of the site superintendent or his designee.

4.6 Topsoil

NWP will clear and grub incrementally and only as needed within designated work areas, minimizing disturbed areas and enabling the existing vegetation to be used as an aid in preventing soil erosion and/or windblown dust. Additionally, defined pedestrian and vehicle routes will be established to further minimize exposed areas that have the potential to generate windblown dust. Exposed areas of clean topsoil may be managed primarily with the application of a chemical fixative. As necessary, some areas may be covered with a liner and gravel to minimize spread of contamination and reduce compaction, to the extent feasible. Other clean areas will be maintained as uncontaminated SZs. NWP will import only clean topsoil as fill and will not stockpile topsoil for reuse, as per contract requirements.

Installation. The installation of topsoil will begin after completion of backfilling using import general fill in a specific remediation work area.

Maintenance. Exposed areas will be inspected weekly for integrity, including the need for the reapplication of chemical fixative. Exposed areas will also be evaluated at the end of shift and prior to weekends or extended shutdowns to determine if additional fixative or covering is required to prevent dust generation. For areas where liner and gravel have been placed, any exposed or damaged liner will be repaired using clean gravel and site equipment.

4.7 Storm Drain Inlets

4.7.1 General

NWP will install storm drain inlet protection measures, as needed, to remove sediment from stormwater prior to entering inlets. NWP may use a combination of filter bags, silt fencing, and good housekeeping practices, as deemed appropriate. Inlet protection measures may be removed in the event of flood conditions or to prevent erosion.

Throughout the duration of the project, potentially affected inlets will be located, assessed and protected, as necessary. As the need for storm drain inlet controls are identified, the SWPPP Drawings in Appendix C will be revised to illustrate installation locations. Example products and specifications for inlet controls are included within the General Notes in Appendix C.
4.7.2 Specific Storm Drain Inlet Controls

4.7.2.1 Silt Fence

Silt fencing and/or other erosion and sediment controls may be placed around storm drain inlets, as deemed appropriate, to minimize the amount of sediment that reaches the storm drain inlet. Specific requirements relative to the installation of control measures are provided in Section 4.2.

Installation. Storm drain inlet controls will be installed as needs are identified.

Maintenance. Erosion and sediment controls will be inspected at least weekly, as described in Section 6. Any required repairs will be made promptly and sediment will be removed and taken to the Loadout Pad or Staging Pad once it reaches one-third the height of the control measure. Erosion and sediment controls will be removed when no longer necessary (e.g., stabilization is completed or the structure is removed).

4.7.2.2 Filter Bags

Filter bags may be placed inside inlets, as deemed appropriate, to minimize the amount of sediment released into storm sewer conveyances. Filter bags are designed to hang suspended at a distance below the grate, allowing full water flow into the drainage structure if the bag is completely filled with sediment. Example filter bag inlet control products are provided within the General Notes in Appendix C.

Installation. Storm drain inlet controls will be installed as needs are identified.

Maintenance. Filter bags will be inspected at least weekly for damage and sediment build-up. Filter bags will be emptied and taken to the Loadout Pad or Staging Pad if more than half filled with sediment and debris. The filter bag will be replaced if torn or punctured to 1/2-in. diameter or greater on the lower half of the bag. The technician will ensure that the replacement bag is installed in accordance with manufacturer requirements. Filter bags will be removed once they are no longer necessary (e.g., stabilization is completed or the structure is removed). Additional maintenance requirements are included in the General Notes in Appendix C.

4.7.2.3 Good Housekeeping Practices

Discharges of any construction chemicals; petroleum, oil, or lubricants; or other fluids to storm drain inlets are prohibited, as described in Section 5.2, Spill Prevention and Response.

Installation. Good housekeeping practices will be used at all times during remedial action activities, and spill kits and erosion and sediment control materials will be ready for immediate use. All site personnel will be trained on the SWPPP, including spill prevention and response.
4.8 Temporary Diversions

4.8.1 Earth Berm/Diversion Dike
An earth berm is a ridge or a ridge-and-channel combination used to protect work areas from upslope runoff and to direct sediment-laden water to appropriate traps or stable outlets. The berms are usually made from compacted soil, filter socks or silt fence, and stone, riprap, or vegetation to stabilize the channel (where applicable).

Installation. Earth berms may be installed around the contaminated areas in the Lagoon A drainage swale that drains to the west, as shown on the drawings in Appendix C. Additional earth berms/diversion dikes will be installed as needs are identified.

Maintenance. Earth berms will be inspected weekly for continuity and integrity. Damaged berms will be repaired promptly, as indicated on the drawings in Appendix C.

4.8.2 Drainage Swale
A drainage swale is a channel with a lining of vegetation, riprap, asphalt, concrete, or other material to control sediment runoff. A drainage swale applies when runoff is to be conveyed without causing erosion. Drainage swales draining a disturbed area can be to a sediment trapping device or stable outlet prior to its release.

Installation. Drainage swales will be installed as needs are identified.

Maintenance. The flow channel and outlet will be inspected at least weekly for deficiencies or signs of erosion. Maintenance on the channel will be performed as needed to promote proper flow. The swale will be reseeded or stabilized as needed to prevent erosion during a storm event. Additional maintenance requirements are included in the General Notes in Appendix C.

4.8.3 Temporary Diversion Ditch
Temporary diversion ditch applies to remediation work areas where runoff must be redirected in order to prevent offsite sedimentation, erosion, or flooding of work areas. Temporary diversions are particularly applicable to prevent flow from damaging erodible or unstable areas. Temporary diversions are appropriate for drainage areas less than 10 acres.

Installation. Temporary diversion ditches will be installed as needs are identified.

Maintenance. The flow channel and outlet will be inspected at least weekly for deficiencies or signs of erosion. Maintenance will be performed on the channel as needed to promote proper flow and as directed in the General Notes provided in Appendix C.
4.9 Sediment Control

4.9.1 Sediment Basin
Sedimentation basins/settling ponds receive and contain concentrated stormwater flow from the diversion ditches/channels installed to manage runon to and runoff from remediation work areas.

Although a typical design allows for slow, controlled release of stormwater to offsite conveyances after settling has occurred, water received from remediation activities will be contained and managed in accordance with the WMP (USACE 2018a). Sediment basins/settling ponds will be designed using sound engineering practices with installation locations based on a detailed civil survey and resultant topographical map. Specifics concerning installation locations and structure maintenance will be included in this SWPPP prior to commencement of ground-disturbing activities requiring these controls. The site drawings in Appendix C will be revised to illustrate the locations of sediment basins/settling ponds.

Installation. Sediment basins will be installed as needs are identified.

Maintenance. Sediment basins will be inspected at least weekly for damage and sediment buildup. During inspection of the basins, if one-half of the design volume has been filled with sediment, the sediment will be removed. Additional maintenance requirements will be added to the General Notes in Appendix C based upon the specific installation.

4.9.2 Sediment Trap
Sediment traps will be placed within ditches and other flow paths in conjunction with rock check dams to detain the runoff long enough to allow most of the fine-grained (silt) material to settle out.

Sediments traps are designed as a shallow pool placing an earthen embankment across a low area or drainage swale. An outlet or spillway is constructed using large stones or aggregate to slow the release of runoff.

Installation. Sediment traps will be installed as needs are identified.

Maintenance. Sediment traps will be inspected at least weekly for damage and sediment buildup. During inspection of the traps, if one-half of the design volume has been filled with sediment, the sediment will be removed. Additional maintenance requirements are included in the General Notes in Appendix C.
4.9.3 Filter Sock
Filter socks can be placed in areas where silt fence is required, around inlets, across ditches, and can provide perimeter controls. Filter socks create a temporary ponding area behind the sock, which facilitates the deposition of suspended solids.

**Installation.** Filter socks will be installed as needs are identified.

**Maintenance.** Filter socks will be inspected at least weekly for damage and sediment build-up. If accumulated sediment reaches one-third the sock height, it will be removed. Additional maintenance requirements are included in the General Notes in Appendix C.

4.9.4 Rock Check Dam
Rock check dams will be placed within ditches and other flow paths to slow the flow within a drainage feature to reduce erosion and to minimize the amount of sediment released into nearby waterways (ditches, creeks, streams, etc., outside of the site). Check dams are moderately effective in trapping sediment, and highly effective in preventing down-cutting in a ditch. They generally provide relatively fair-to-good removal of coarse and medium-sized sediment from runoff; however, most fine silt and clay particles will pass through the voids on these structures. Typically, when fine-grained particles are present on the site, the site will employ sediment traps in conjunction with rock check dams.

**Installation.** Rock check dams will be installed as needs are identified.

**Maintenance.** Rock check dams will be inspected at least weekly for signs of erosion and sediment build-up. Sediment shall be removed from behind the check dam once it accumulates to one-half the original height of the check dam. Additional maintenance requirements are included in the General Notes in Appendix C.

4.9.5 Dewatering Filter Bag
Accumulated stormwater is commonly pumped and discharged into a filter bag. Filter bags are manufactured products made typically from woven monofilament polypropylene textile (coarse material, e.g., sands) or non-woven geotextile (silt and clays chosen for the predominant sediment size). Filter bags are single-use products that must be replaced when they become clogged or half-full of sediment.

**Installation.** Dewatering filter bags will be installed as needs are identified.

**Maintenance.** Dewatering filter bags will be inspected prior to each use and maintained as directed in the drawings in Appendix C.
4.10 Surface Stabilization

Surface stabilization is the most effective means to minimize erosion and offsite sediment from leaving disturbed/remediation work areas. Stabilized soils have vegetative or other types of cover left during construction or replaced following disturbance in order to prevent wind or water erosion. Maintaining stabilization involves taking key steps at planning and continuing until the end of construction/remediation.

During project planning efforts will be made to retain existing vegetation. This can be accomplished by phasing construction activity, using “open space” design concepts, and minimizing corridor widths for roads and utility construction. Special emphasis on preserving natural vegetation should be made near sensitive areas such as wetlands, stream corridors, steep slopes, and woodlots. Ideally, natural areas should be set aside permanently; however, even delaying disturbance of portions of a site through phasing will prevent significant erosion from occurring. Once clearing and grading begins, erosion will occur until the site is re-stabilized. This occurs as rough or finish grading operations become idle or finished and are seeded and mulched as soon as possible, during any season. The most common methods, seeding and mulching, are relatively inexpensive, easy to implement, and require minimum maintenance.

Surface stabilization shall include, but not be limited to, the following controls:

- Minimized phased disturbance.
- Temporary seeding.
- Mulching.
- Permanent seeding.
- Turf reinforcement matting.
- Sodding.

4.10.1 Minimized Phased Disturbance

Phased disturbance limits the total area of earth disturbance at any one time and sequences operations in order to preserve existing or previously re-established vegetation, prior to performing additional earthwork. This approach actively monitors and manages exposed areas, so that erosion is minimized and sediment controls can be more effective in protecting aquatic resources and downstream landowners.

Installation. A phased disturbance approach will be implemented as the project progresses.

Maintenance. Refer to drawings in Appendix C for maintenance requirements.
4.10.2 Temporary Seeding
Temporary seeding establishes temporary cover on disturbed areas by planting appropriate rapidly growing annual grasses or small grains. Temporary seeding provides erosion control on areas in between construction operations. Grasses, which are quick growing, are seeded and usually mulched to provide prompt, temporary soil stabilization. Temporary seeding effectively minimizes the area of a construction site prone to erosion and windblown dust.

Installation. Temporary seeding may be implemented in areas to allow establishment of vegetation as the project progress.

Maintenance. Refer to drawings in Appendix C for maintenance requirements.

4.10.3 Mulching
A protective layer of mulch, usually of straw, applied to bare soil is used to abate erosion by shielding it from raindrop impact. Mulch also helps establish vegetation by conserving moisture and creating favorable conditions for seeds to germinate.

Installation. Mulch should be applied to disturbed areas in accordance with the specification in Appendix C.

Maintenance. Refer to drawings in Appendix C for maintenance requirements.

4.10.4 Permanent Seeding
Perennial vegetation will be established over disturbed areas following backfilling and/or restoration. Permanent vegetation is used to stabilize soil, reduce erosion, prevent sediment pollution, reduce runoff by promoting infiltration, and provide stormwater quality benefits offered by dense grass cover.

Installation. Permanent seeding includes site preparation, seedbed preparation, planting seed, mulching, and irrigation as specified in Appendix C.

Maintenance. Refer to drawings in Appendix C for maintenance requirements.

4.10.5 Turf Reinforcement Matting
Turf reinforcement matting is a permanent, non-degradable rolled erosion control product used to reinforce natural soil and vegetated growth with synthetic materials to prevent erosion and maintain the durability of vegetated areas. Turf reinforcement is generally an interwoven material applied to areas where natural vegetation alone is not sufficient to withstand expected flow conditions or to provide sufficient long-term erosion protection.

Installation. Turf reinforcement matting will be installed as needs are identified.
4.10.6 Sodding
Sodding utilizes rolls or mats of turf grass to provide immediate stabilization to bare soils. It is especially useful in highly erosive areas such as drainage ways and on slopes that will be mowed.

Installation. Sodding will be installed as needs are identified.

4.11 Water Management Practices

Potential FUSRAP-contaminated waters requiring management include:

- Direct precipitation.
- Naturally occurring groundwater.
- Runon accumulated within the excavations.
- Water collected from the concrete soil staging/processing pads.
- Water collected from decontamination activities.
- Water collected from the laboratory/personnel showers.
- Water collected in frac tank containment skirts.

All of these waters, as well as any other suspect waters, will be considered potentially FUSRAP-contaminated. Water collection, treatment, sampling, discharge, and disposal will be performed in accordance with the WMP (USACE 2018a).

NWP will not discharge any water accumulated within the excavations or generated during site remediation activities that may be potentially FUSRAP-contaminated either directly or indirectly into any creeks, ditches, streams, or waterways without appropriate sampling and analysis and treatment, if required. NWP will comply with the substantive requirements of all federal, state, and local regulations and/or guidelines, including but not limited to the State of Ohio Water Quality Standards (Ohio Administrative Code 3745-1).
4.12 Final Site Stabilization

The S-1 work area will be in use for the duration of remediation activities; therefore, final stabilization is not addressed in this SWPPP. Stabilization of the remediation work areas upon the completion of remediation activities is addressed in the Backfill and Restoration Plan for the Luckey Formerly Utilized Sites Remedial Action Program Remediation Project (USACE 2019). All grading and stabilization activities will be logged and tracked in Daily Project Reports. Activities will also be monitored документed during weekly inspections. Reports and inspection records will be maintained in the project records.

5. POLLUTION PREVENTION STANDARDS

5.1 Potential Sources of Pollution

Potential sources of non-sediment stormwater pollution during remediation work activities are listed in Table 5-1. Potential sources will be periodically evaluated as the project progresses and revised, as appropriate.

Table 5-1. Construction site potential pollutants.

<table>
<thead>
<tr>
<th>Pollutant-Generating Activity</th>
<th>Pollutants or Pollutant Constituents (that could be discharged if exposed to stormwater)</th>
<th>Location on Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle use</td>
<td>Petroleum, oil, and lubricants</td>
<td>Equipment and support vehicle parking area (Figure A-1)</td>
</tr>
<tr>
<td></td>
<td>Antifreeze</td>
<td>Equipment and support vehicle parking area (Figure A-1)</td>
</tr>
<tr>
<td></td>
<td>Hydraulic fluid</td>
<td>Equipment and support vehicle parking area (Figure A-1)</td>
</tr>
<tr>
<td>Site construction</td>
<td>Paint</td>
<td>Equipment and support vehicle parking area (Figure A-1)</td>
</tr>
<tr>
<td></td>
<td>Solvents</td>
<td>Equipment and support vehicle parking area (Figure A-1)</td>
</tr>
<tr>
<td></td>
<td>Petroleum-based products</td>
<td>Equipment and support vehicle parking area (Figure A-1)</td>
</tr>
</tbody>
</table>

5.2 Spill Prevention and Response

Consistent with the CGP requirements, all potential pollutants other than sediment will be handled and disposed of in a manner that does not cause contamination of stormwater. Non-sediment pollutants that may be present during remedial activities include those listed in
Table 5-1. These materials and other materials, used during the remediation project, with the potential to impact stormwater will be stored, managed, used, and disposed of in a manner that minimizes the potential for releases to the environment. Emergency contacts for the project will be posted at the project office and are included in Appendix B of this SWPPP.

5.2.1 General Materials Handling Practices
The following general practices will be used throughout the project to reduce the potential for spills:

- Potential pollutants will be stored in a secure location and used in a manner consistent with manufacturer instructions.
- Materials disposal will be in accordance with manufacturer instructions and applicable local, state, and federal regulations.
- Materials no longer required for the project will be removed from the site as soon as practical.
- Adequate garbage, construction waste, and sanitary waste handling and disposal facilities will be provided to the extent necessary to keep the site clear of obstruction and the best management practices (BMPs) clear and functional.

5.2.2 Specific Materials Handling Practices
- All chemicals – including liquid products, petroleum products, water treatment, and chemicals stored onsite – will be covered, contained, and kept in locked cabinets or other lockable storage areas to ensure they are protected from vandalism.
- Maintenance and repair of all equipment and vehicles involving oil changes, hydraulic system drain-down, degreasing operations, fuel tank drain-down and removal, and other activities that may result in the accidental release of contaminants will be conducted under cover during wet weather and on an impervious surface to prevent the release of contaminants onto the ground. Materials spilled during maintenance operations will be cleaned up immediately and properly disposed of.

5.2.3 Spill Response
The primary objective in responding to a spill is to quickly contain the materials, and to prevent or minimize migration and entry into stormwater runoff and conveyance systems, and surface water. If the release has impacted onsite stormwater, it is critical to contain the released materials onsite and prevent release into receiving waters.

If a spill of pollutants threatens stormwater at the site, the spill response procedures outlined below must be implemented in a timely manner to prevent the release of pollutants.
The site superintendent, site safety and health officer (SSHO), health physics (HP) supervisor, and waste manager will be notified immediately when a spill, or the threat of a spill, is observed. The SSHO or appropriately trained person will assess the situation and determine the appropriate response.

If spills represent an imminent threat of escaping and entering the receiving waters, facility personnel will respond immediately to contain the release and notify the site superintendent after the situation has been stabilized.

Spill kits containing materials and equipment for spill response and cleanup will be maintained at the site. Each spill kit will contain at a minimum:
  - Oil-absorbent pads or approved granular material.
  - Personal protective equipment (PPE), including gloves and goggles.

The waste manager, or his designee, will be responsible for completing the spill reporting forms and for reporting the spill to the appropriate state or local agency, as outlined in Section 5.2.4 below. The associated spill reporting forms are contained within the Spill Prevention, Control, and Countermeasure Plan (SPCC; USACE 2018c).

Facility personnel with primary responsibility for spill response and cleanup will receive training from the site superintendent. This training will include identifying the location of spill kits and other spill response equipment, and the use of spill response materials.

Spill response equipment will be inspected and maintained as necessary to replace any materials used in spill response activities.

### 5.2.4 Notification

In the event of a spill, the waste manager will notify the SSHO and project manager of any recordable spill. The project manager will notify the USACE. The following notifications will be made in conjunction with the USACE:

- Any spill of oil that (1) violates water quality standards, (2) produces a “sheen” on a surface water, or (3) causes a sludge or emulsion must be reported immediately by telephone to the OEP A Emergency Number – 1-800-282-9378 and to the National Response Center Hotline at 1-800-424-8802.
- Any hazardous substance or hazardous waste release that exceeds the reportable quantity must be reported immediately by telephone to the National Response Center Hotline at 1-800-424-8802.
- Any spill of oil or hazardous substance to waters of the state must be reported immediately by telephone to the OEP A Emergency Number – 1-800-282-9378, to the U.S. Coast Guard National Response Center Hotline at 1-800-424-8802, and to appropriate USACE personnel.
5.3 Fueling and Maintenance of Equipment or Vehicles

Maintenance and repair of all equipment and vehicles involving oil changes, hydraulic system drain-down, degreasing operations, and other activities that may result in the accidental release of contaminants will be conducted under cover during wet weather and on an impervious surface to prevent the release of contaminants onto the ground. Materials spilled during maintenance operations will be cleaned up immediately and properly disposed of in coordination with the site waste manager.

In the event of a fuel spill (i.e., release greater than 10 gallons), responders will perform the following tasks:

- Notify the site superintendent, SSHO, HP supervisor, and waste manager.
- Waste manager will estimate volume of fuel spilled and will notify the SSHO and project manager.
- SSHO will ensure workers responding to the spill are 40-Hour Hazardous Waste Operations and Emergency Response trained. SSHO will also ensure proper PPE is utilized and monitor the vapor concentration in the spill area, when deemed necessary.
- Site superintendent and waste manager will coordinate cleanup, and the waste manager will provide waste containers and complete notification forms located within the SPCC (USACE 2018c).
- Waste manager will notify the SSHO and project manager of any recordable spill, and the project manager will notify the USACE.
- If the fuel spill exceeds 25 gallons, call the local fire department and the local emergency planning committee within 30 minutes. Report the incident to the OEPA Emergency Number – 1-800-282-9378.
- Document the location of the spill on the daily contractor quality control report. The USACE Quality Control System will be utilized for this report.
- Perform a visual inspection of the site and its surroundings to determine its current uses, topography, buried utilities, sewers and surface drainage, structures and improvements, nearby sources of drinking water supply, natural barriers or engineered structures that constrain contaminant movement, visible and olfactory evidence of the extent of the contamination, as well as evidence of pertinent geologic and hydrogeologic (i.e., surface and groundwater) conditions. Record the observations and events as remembered by those present at the spill. Depict the exact nature of the opening through which the release occurred in photos, drawings, or diagrams. Record the amount of product spilled.
- Assess whether the fuel is entering a waterway (such as a stream, or storm sewer inlet). If it is entering a waterway, block the flow of free product.
• If the spill cannot be removed immediately, use degradable spray paint and caution tape to mark the area where the spill occurred. Secure the spill site from entry by unauthorized personnel by roping off the area and posting warning signs.

• If the spill occurred on a permeable surface (such as soil), remove the soil until visual observations and appropriate instrument readings do not indicate contamination. Containerize contaminated soil as non-hazardous special waste and contact the waste manager to make arrangements for transportation and disposal.

• If the spill occurred on an impervious surface, surround the spill with a dike using absorbent material to prevent further spreading. Use absorbent material to remove visible traces of fuel. Containerize contaminated absorbent material in a sealable, leak-proof container and label the container as non-hazardous special waste. Contact the waste manager to make arrangements for transportation and disposal.

5.4 Washing of Equipment and Vehicles

NWP will use the decontamination pad discussed in Section 4.3.2.2 for washing all equipment and vehicles leaving the EZ. The decontamination pad will allow for the containment and transfer of collected water to the onsite WWTP. Decontamination water will be managed in accordance with the WMP (USACE 2018a).

5.5 Storage, Handling, and Disposal of Construction Products, Materials, and Wastes

5.5.1 Petroleum, Oil and Lubricants

NWP will store, handle, and dispose of petroleum-based products, oil, lubricants, and other chemicals in accordance with the WMTDP (USACE 2018b). The following BMPs will be employed as appropriate:

• Designate a construction waste collection area that does not receive runoff and does not drain directly to a waterbody.

• Ensure that containers have lids and are in a covered area whenever possible.

• Schedule waste collection to prevent the containers from overfilling.

• Clean up spills immediately. For hazardous materials, follow cleanup instructions on the package. Use an absorbent material such as sawdust or kitty litter to contain the spill.

• Collect, remove, and dispose of all construction site wastes at authorized disposal areas.
5.5.2 Hazardous or Toxic Waste

NWP will store, handle, and dispose of paints, solvents, and petroleum-based products in accordance with the WMTDP (USACE 2018b). The following BMPs will be employed as appropriate:

- Consult with the waste manager about the requirements for disposing of hazardous materials, including soils contaminated by spills of hazardous materials.
- Empty and rinse hazardous waste containers before disposing of them.
- Retain original product label on containers and follow the manufacturer’s disposal instructions on the label.
- Do not mix excess products when disposing of them, unless specifically recommended by the manufacturer.
6. INSPECTION AND CORRECTIVE ACTION

6.1 Inspection Personnel and Procedures

6.1.1 Personnel Responsible for Inspections
Personnel responsible for inspections are listed in Appendix B.

6.1.2 Inspection Schedule
Stormwater controls will be inspected weekly and within 24 hours after every rain event of 0.5 inches within a 24-hour period. The project meteorological station will be used as the primary means to monitor rainfall onsite. Offsite monitors will be consulted should the onsite monitor be unavailable. The inspection will be documented and signed by the inspector after every inspection. Inspection records will be kept for 3 years after termination of remediation activities. The SWPPP inspection frequency may be decreased in frequency to bi-weekly or monthly due to frozen conditions in winter months or due to dry weather conditions (i.e., no measurable rainfall) in summer months.

6.1.3 Inspections
Documented weekly inspections will contain, at a minimum, the following information:

1) Inspection date.
2) Names, titles and qualifications of inspection personnel.
3) Weather information for the period since the last inspection.
4) Weather information and a description of any discharges occurring at the time of the inspection.
5) Location of discharges of sediment or other pollutants from the site.
6) Location of BMPs that need to be maintained.
7) Locations of BMPs that failed to operate as designed or prove inadequate for a particular location.
8) Locations where additional BMPs are needed that did not exist at the time of the inspection.
9) Corrective actions required including any changes to the SWPPP necessary and implementation dates.
Inspections will be documented on an inspection form similar to the sample report form included in Appendix D. Inspection forms will be tailored to address specific controls in use. Inspection reports will be maintained in the project records.

Weekly inspections will be conducted by designated project staff who have been trained to the requirements of this SWPPP and receive an additional level of training in inspections.

### 6.2 Corrective Action

Damaged stormwater controls or those requiring maintenance will be corrected within 3 days of inspection. Missing controls or controls that otherwise do not perform the intended function will be replaced by functional controls within 10 days of inspection.

#### 6.2.1 Personnel Responsible for Corrective Actions

Personnel responsible for corrective actions are listed in Appendix B.

#### 6.2.2 Corrective Action Documentation

Corrective actions will be documented in the Daily Project Reports as well as weekly inspection reports. Reports and weekly inspection reports will be maintained in the project records.

### 6.3 Delegation of Authority

The site superintendent may delegate inspections and corrective actions to qualified personnel of his choice who have received training on this SWPPP. Duly Authorized Representatives are listed in Appendix B.
7. TRAINING

Personnel responsible for implementing this SWPPP will be trained to the following work scope elements:

- Design, installation, maintenance, and/or repair of stormwater controls (including pollution prevention measures).
- Conducting inspections.
- Performing corrective actions.
- Spill response.

Personnel will be trained to understand the following as related to the scope of their job duties:

- The location of all stormwater controls on the site required by this plan, and how the controls are to be maintained.
- The proper procedures to follow with respect to this plan’s pollution prevention requirements.
- When and how to conduct inspections, record applicable findings, and take corrective actions.
- Spill response.

All site personnel, including subcontractors, will be trained commensurate to their job duties on the SWPPP. Training will be documented and records maintained in accordance with the NWP training protocols/procedures.
8. CERTIFICATION AND NOTIFICATION

A signed certification statement has been included in Appendix E.
9. REFERENCES


USEPA, 2012b, *USEPA Construction Grant Permit*. 
Appendix A – Site Layout and Water and Drainage Features
Figure A-1. Luckey Site Layout.
Figure A-2. Luckey Site Surface Drainage Features.
Appendix B – Emergency and Site Contacts List
Emergency and Site Contacts List
Appendix C – SWPPP Drawings
NORTHWIND - PORTAGE
LUCKEY FUSSRAP
STORM WATER POLLUTION PREVENTION PLAN (SWPPP)
21200 LUCKEY RD., VILLAGE OF LUCKEY, OH
WOOD COUNTY
REVISED NOVEMBER 2019
Appendix D – Sample Inspection Report
# STORMWATER POLLUTION PREVENTION PLAN INSPECTION REPORT

## GENERAL INFORMATION

<table>
<thead>
<tr>
<th>CONTRACTOR:</th>
<th>North Wind Portage</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROJECT NAME:</td>
<td>Lucky Soils Remediation Project</td>
</tr>
<tr>
<td>LOCATION:</td>
<td>21200 Lucky Road, Lucky, Ohio 43443</td>
</tr>
<tr>
<td>INSPECTION DATE &amp; TIME:</td>
<td></td>
</tr>
</tbody>
</table>

**SWPPP INSPECTOR’S NAME & CREDENTIALS & CONTACT INFORMATION:**

| Name: | |
| Email: | |
| Phone: | |

**NORTHWIND PERSONNEL PRESENT FOR INSPECTION:**

<table>
<thead>
<tr>
<th>TYPE OF INSPECTION:</th>
<th>MONTHLY</th>
<th>WEEKLY</th>
<th>PRE-STORM EVENT</th>
<th>DURING STORM EVENT</th>
<th>POST STORM EVENT</th>
</tr>
</thead>
</table>

**WEATHER CONDITIONS**

**HAS IT RAINED SINCE THE LAST INSPECTION:**

- [ ] ☑ YES
- [ ] ☑ NO
- [ ] DURING INSPECTION

**DATE:**

<table>
<thead>
<tr>
<th>DURATION (hours):</th>
<th>PRECIPITATION (inches):</th>
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<tr>
<th>DATE:</th>
<th>DURATION (hours):</th>
<th>PRECIPITATION (inches):</th>
</tr>
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</table>

**WEATHER AND SITE CONDITIONS DURING THE INSPECTION:**

*Precipitation data from onsite meteorological station.*

## SOIL CONDITIONS

**Condition of Soil:**

- [ ] DRY
- [ ] WET
- [ ] SATURATED
- [ ] FROZEN

## OVERALL SITE BMP CONDITIONS

**DO YOU SUSPECT DISCHARGES MAY HAVE OCCURRED SINCE THE LAST INSPECTION OR DURING THE CURRENT INSPECTION?**

- [ ] ☑ YES
- [ ] NO

### BEST MANAGEMENT PRACTICES

<table>
<thead>
<tr>
<th>BEST MANAGEMENT PRACTICES</th>
<th>IMPLEMENTED</th>
<th>MAINTENANCE NEEDED</th>
<th>CORRECTIONS/NOTES (refer to field notes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARE ALL DISTURBED AREAS THAT ARE DORMANT OR COMPLETED PROPERLY STABILIZED?</td>
<td>☑ YES</td>
<td>☑ YES</td>
<td>☑ YES</td>
</tr>
<tr>
<td>ARE CONSTRUCTION ENTRANCES PROPERLY INSTALLED AND MAINTAINED?</td>
<td>☑ YES</td>
<td>☑ YES</td>
<td>☑ YES</td>
</tr>
<tr>
<td>ARE PERIMETER CONTROLS, SEDIMENT CONTROLS &amp; RUNOFF CONTROLS PROPERLY INSTALLED AND MAINTAINED?</td>
<td>☑ YES</td>
<td>☑ YES</td>
<td>☑ YES</td>
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<tr>
<td>ARE SEDIMENT BASINS/TRAPS PROPERLY CONSTRUCTED AND MAINTAINED?</td>
<td>☑ YES</td>
<td>☑ YES</td>
<td>☑ YES</td>
</tr>
<tr>
<td>ARE NON-SEDIMENT RELATED POLLUTANTS PROPERLY CONTAINED &amp; BMPS IN PLACE?</td>
<td>☑ YES</td>
<td>☑ YES</td>
<td>☑ YES</td>
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</tbody>
</table>
# STORMWATER POLLUTION PREVENTION PLAN INSPECTION REPORT

## GENERAL INFORMATION

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<tr>
<td>LOCATION:</td>
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<tr>
<td>INSPECTION DATE &amp; TIME:</td>
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</table>

(keep all hazardous materials at least 100’ away from natural resources, discharge points)

| ARE NATURAL RESOURCE AREAS (E.G., STREAMS, WETLANDS, MATURE TREES, ETC.) PROTECTED WITH BMPS? | □ YES □ NO □ YES □ NO |
| ARE DISCHARGE POINTS AND RECEIVING WATERS FREE OF SEDIMENT DEPOSITS? | □ YES □ NO □ YES □ NO |

## SITE SPECIFIC BMP CONDITIONS

*Refer To Attached Drawings and Punch List For The Locations & Descriptions Of The Corrective Actions Needed*

<table>
<thead>
<tr>
<th>BEST MANAGEMENT PRACTICES</th>
<th>IMPLEMENTED</th>
<th>MAINTENANCE NEEDED</th>
<th>CORRECTIONS/NOTES</th>
</tr>
</thead>
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<tr>
<td>Silt Fence/Wattles</td>
<td>□ YES □ NO</td>
<td>□ YES □ NO</td>
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<td>Inlet Protection</td>
<td>□ YES □ NO</td>
<td>□ YES □ NO</td>
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<tr>
<td>Temporary Stabilization</td>
<td>□ YES □ NO</td>
<td>□ YES □ NO</td>
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<tr>
<td>Photo Log</td>
<td>No Applicable Photos for Current Inspection</td>
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</tbody>
</table>
STORMWATER POLLUTION PREVENTION PLAN INSPECTION REPORT

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<tbody>
<tr>
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<td>Lucky Soils Remediation Project</td>
<td>21200 Lucky Road, Lucky, Ohio 43443</td>
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</tbody>
</table>

**MAINTENANCE LOG**

<table>
<thead>
<tr>
<th>#</th>
<th>Date Noted</th>
<th>BMP</th>
<th>Photo</th>
<th>*Code</th>
<th>Notes</th>
<th>Comment / Date Corrected</th>
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</tbody>
</table>

*Code: M = Maintenance Needed | I = Installed | W = Working | NA = Area Not Active | R = Removed
Yellow Highlighting = Needs Attention | Grey Highlighting = Already Addressed
STORMWATER POLLUTION PREVENTION PLAN INSPECTION REPORT

<table>
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<tr>
<td>LOCATION:</td>
</tr>
<tr>
<td>INSPECTION DATE &amp; TIME:</td>
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</tbody>
</table>

Note person(s) notified of any inspection finding(s) and expected date of correction:

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

SWPPP Inspector

Print Name: ___________________________  Signature: ___________________________  Date: ___________________________

SWPPP Designer

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

Name: [Redacted] Title: Project Manager

Signature: [Redacted] Date: 11/21/19

[Repeat as needed for multiple construction operators at the site.]