TRIERWEILER

CONSTRUCTION & SUPPLY CO. INC.

Ground Water and Storm Water

Pollution Prevention and Spill Response Plan

For

Temporary Concrete Batch Plant

Purpose and Scope

This pollution prevention plan concentrates on identifying potential pollutants at the work site, and adopting management practices that eliminate their contact with sensitive waters of the state. The primary focus of this plan is to provide education for field employees, thereby reducing human error as a contributor to environmental pollution.

I. Potential Pollutants

A. #2 Fuel Oil

1. Spills during equipment refueling
2. Bulk Shipment deliveries – overfill
3. Broken or leaking fuel lines and hoses

B. Lubricating Oils

1. Overfilling gearboxes
2. Leaking seals and mechanical equipment
3. Engine breather pipes
4. Spills during oil changes
5. Improper storage of oil inventory

C. Grease

1. Over greasing bearings and wear surfaces
2. Improper disposal of cleaning towels

D. Antifreeze

1. Leakage from damages radiators

2. Overfill/Spill

E. Sediment

1. Runoff not contained on site
2. Poor operating techniques

II. Implementation of Best Management Practices (BMP)

A. Education

1. The pollution prevention plan is reviewed at the Trierweiler annual safety meeting. The intent of the plan is stressed, changes or improvement are noted. Field employees discuss the plan, and exchange ideas for potential plan improvement. Any new ideas that contribute to the intent of the plan are included in the written pollution prevention plan for the next year.
2. Information about the importance of pollution prevention is routinely stressed at scheduled tailgate safety meetings. Topics for discussion include safe petroleum product handling, proper maintenance procedures and routine inspection of the equipment during operation. Personnel are encouraged to take a pro-active role in prevention of spills. Good housekeeping practices are stressed for control of minor drips and leaks from daily maintenance and operation.

B. Inspection and Supervision

1. The temporary Concrete Batch Plant is routinely inspected each day of operation to ensure that all equipment is functioning properly, all valves are closed, and significant materials are properly stored and secure.
2. Fuel Transfers are supervised to ensure that spills do not occur. Plant personnel assist tanker drivers as needed to provide safe and effective transfer of fuels.
3. Refueling of the Batch Plant equipment is monitored at all times to eliminate overfilling.

C. Communication and Response

1. The emergency response plan for spills is posted in the repair trailer for the Batch Plant operations. Employees are aware of the location of the listing and follow the outlined procedure in a spill situation.
2. Plant personnel respond immediately to a spill situation to mitigate effects and isolate/control source of spill. Operations are immediately shut down when necessary to redirect on-site resources and manpower in spill response.

3. Company contact personnel and emergency phone numbers are posted in the repair trailer to provide operators with immediate access to company support. Contact with Jeremy Iwanski is established as soon as possible after the spill so that proper reporting requirements can be met.

D. Selection of Plant Sites

1. Environmental impacts in equipment and work areas are considered prior to set up in and location.

2. Whenever possible, Batch Plant equipment is located in a pit or quarry that provides natural, on site containment of storm water runoff, and ample protection for sensitive ground water supplies.

3. In locations where there is increased environmental sensitivity because of proximity to receiving waters, lack of natural containment, or other critical factors, berms or diking will be constructed that will contain runoff or protect a potential spill from releasing into the ground water in the immediate equipment area.

E. Petroleum Product Storage

1. All fuel tanks shall have drip pans or absorbent material available for nozzle storage between refueling. Tanks and hoses are inspected daily for integrity and any problems are corrected.

2. Lubricants and grease are stored in the repair or service trailer until needed. The storage area is secured at the end of each operating cycle.

3. Drip pans and contaminated absorbent material are replaced at the end of each work shift and at the onset of precipitation to eliminate ground water and surface water exposure to petroleum products. Containers are located in the service trailer for storage of used absorbents and other cleanup materials.

4. Used oil and grease from equipment service and repair is stored inside the plant service trailer until collected for off-site disposal.

F. Repair and Maintenance

1. Engines and gearboxes will be inspected and fully serviced as needed during the off-season to eliminate leaking seals, fuel lines, and gaskets. Leaks that develop during operations are contained by drip pans, absorbents, or other acceptable means, until company maintenance personnel repair the problem. In cases where continued

operation may cause uncontainable fluid losses, plant operations will cease until the problem is corrected.

2. Batch Plant employees are instructed in proper lubrication procedures for plant equipment. Manufacturer's specifications are followed to eliminate over-fills of gearboxes and crankcases. Greasing of bearings and wear surfaces is carefully monitored to eliminate unnecessary grease contact with the ground. Overflow from bearings is collected and disposed of with contaminated absorbent material.

3. Routine engine oil changes are done with adequate absorbent material to provide for drips and spills associated with maintenance operations. Waste oil is stored in spill proof containers until picked up for off-site disposal.

4. Any leaks that develop during the course of operation may, at the foeman's discretion, be contained with drip pans or petroleum absorbent material, as long as plant operation ceases prior to a storm event and containment vessels are cleaned and free of petroleum to prevent contact with ground water or storm water.

5. Repair and maintenance procedures are conducted in the shop, service trailer or outside with adequate containment for degreasing and cleaning. Petroleum absorbent material is available as needed to supplement containment.

G. Use of Available Resources

1. Housekeeping supplies, including drip pans and absorbent materials, are kept on inventory in the repair trailer at all times. All plant personnel have access to these materials, and are instructed in their use. Additional booms or pads are available upon request.

2. All plant personnel are available to respond to petroleum spills as needed. Other resources may be mobilized to mitigate the effects of a petroleum release, such as subcontractors, additional equipment, or additional personnel.

3. If necessary, plant loading equipment may be used to construct temporary berms or place aggregates for absorbing free flowing liquids. Loading equipment can also be used for backfilling or removing impacted soils or aggregates.

H. Construction of Containment

1. When a plant must be placed in an area where additional containment is needed because of the amount of fines being produced; field employees may elect to construct berms or temporary basins for collection and control of contaminated water.

Necessity of construction is based on slope of plant site, area drained, soil type, and proximity to receiving waters. Other influences may be considered on a site-specific basis as needed to fulfill the purpose of the plan.

2. Water collected in on-site-basins is routinely inspected by field personnel for evidence of petroleum sheen or odor. If no evidence of contamination is apparent, the water may be released by gravity flow or by pumping. Release of water must be done in a manner that will not induce erosion or release water with high sediment loadings into receiving waters. Water collected on-site basins that show evidence of petroleum contamination is pumped into disposal tanks for transport to approved facilities.

3. Erosion control measures outside of plant and equipment work areas may be identified by field personnel. In these situations, company officials should be notified, so that site-specific BMP's can be implanted.