

SECTION 1: Facility Description & Contact Information

1.1 Facility Information

Granite State Minerals, Inc.
227 Market Street
Portsmouth, NH 03801

Previous NPDES ID: NHR05J00T

This marine terminal is in Rockingham County.

Primary Industrial Activity SIC Code, and Section/Subsector of MSGP:

4491 Marine Cargo Handling: docking and unloading of Ships, storage of road salt cargos at the terminal, loading and weighing of delivery trucks for the carriage of road salt to public safety agencies. *See Part 8, Sector Q of the General Permit at pages 172 to 175.*

4214 Local Trucking with Storage is a secondary activity. Delivery trucks are owned and operated by third parties. They do not park at the facility. Truck operators respond to requests from the facility's dispatcher, receive a load, weigh out, and depart for delivery to public safety agencies. *See Part 8, Sector P of the General Permit at pages 169 to 171.*

Latitude: 43°04'49"N (decimal degrees are 43.08027778)

Longitude: 70°45'34"W (decimal degrees are 70.75944444)

Consultant used NHDES Web Site to derive latitude and longitude

Horizontal Reference Datum: NAD 83

This facility is not located in Indian Country.

Granite State Minerals, Inc. is not a "federal operator" of the facility.

Estimated Area of Activity Exposed to Stormwater: The area used for ship unloading, road salt storage, and the loading and weighing of trucks for delivery of road salt to public safety agencies is approximately 2.80 acres.

See Map and Appendices References in Section 1.1.1 of this SWPPP.

Municipal Systems / Receiving Waters: The facility does not discharge stormwater to a municipal storm sewer system. Portsmouth, NH is subject to MS4 coverage, but the facility has no connection to the City's storm drains, including a City drain that runs under the facility. The City drain discharges at the facility shoreline. In the area where industrial activity subject to the General Permit takes place, the stormwater discharges to the Piscataqua River.

Piscataqua River: The river (Portsmouth Harbor) is the surface water that receives stormwater. It is tidal.

Impaired Waters: The "Lower Piscataqua River," identified by NHDES as assessment unit NHEST600031001-02-02, is an impaired water within the scope of Appendix A. According to the *State of New Hampshire 2018 Section 303(d) Surface Water Quality List*, this segment of the river is Category 5. This means that this segment of the river is classified as being in need of a "Total Maximum Daily Load," or "TMDL," but does not yet have one. Listed impairments are:

- Estuarine Bioassessments
- Polychlorinated biphenyls
- Dioxin (including 2,3,7,8-TCDD)

US EPA Region I Guidance does not require monitoring for these pollutants. We have confirmed with Region I that no impaired water monitoring is required.

Monitoring Effluent Limitations: None applicable to this Site. *See* pages 36-40 of this SWPPP for benchmark monitoring and other water sampling requirements.

1.1.1. Facility Information Diagrams

See "General Location" at **Appendix A**. *See* "Site Maps" at **Appendix B**. *See* also **Figure 1** (aerial photograph of Portsmouth Harbor) at page 5; **Figure 2** (aerial photograph of primary components of the facility) at page 7; and **Figure 4** (Site Map with key features) at page 11.

1.2 Contact Information / Responsible Parties

Facility Operators:

Granite State Minerals Market Street Terminal
227 Market Street
Portsmouth, NH 03801
Telephone No. (603) 436-8505

Facility Owner: Granite State Minerals, Inc. has a long-term ground lease.
The fee owner is:

227 Market Street LLC
27 Austin Street
Portsmouth, NH 03801

Primary SWPPP Contact:

Justin Sunderland
Telephone No. 603-436-8505 (terminal office phone)
Email: jsunderland@gmsalt.com

Secondary SWPPP Contact:

Sam Stanley
Telephone No. 603-436-8505
Fax: 603-436-2458

Compliance Support for SWPPP:

Lisa Cratty
AQUALIS
8700 Turnpike Drive, Suite 415, Westminster CO 80031
Email: lcratty@aqualisco.com
Telephone No. 970-999-0480

1.3 Storm Water Pollution Prevention Team

MSGP Reference: Section 5.2.1, Page 31

NAME	INDIVIDUAL RESPONSIBILITIES
<p>Justin Sunderland</p> <ul style="list-style-type: none"> • 603.436.8505 <p>jsunderland@gmsalt.com</p>	<p>Coordinates implementation and oversight of the SWPPP’s Best Management Practices (BMPs)— including site inspections, the collection and documentation of quarterly visual samples, implementing and maintaining control measures, and taking corrective actions and/or AIM responses, when required. Oversees the annual review of the SWPPP. Performs inspections. Oversees the collection and reporting of water samples for benchmark testing. Oversees the preparation and recording of Quarterly Visual Samples and other reports. Oversees all aspects of daily housekeeping at the terminal, including but not limited to removal of materials from surfaces exposed to stormwater, inspection and repair of stockpile covers, replacement of wattles, catch basin socks, and related BMPs. Implements corrective action as needed. Documents inspection observations and corrective action in written reports.</p>
<p>Sam Stanley</p> <ul style="list-style-type: none"> • 603.436.8505 	<p>Spill response coordinator.</p>
<p>Lisa Cratty</p> <ul style="list-style-type: none"> • 970-999-0480 <p>lcratty@aqualisco.com</p>	<p>Conducts at least monthly reviews to the SWPPP and supporting documentation. Makes sure the SWPPP, inspection records, and other records are current. Provides assistance with water quality sampling and reporting. Provides assistance with inspections, training, and other compliance activities.</p>
<p>Joe McNamee</p> <ul style="list-style-type: none"> • 978.764.2303 (c) • 978.458.6420 (o) <p>jmcnamee@easternminerals.com</p>	<p>Oversees development of the SWPPP, and modifications to it. In consultation, recommends capital improvements if needed. Oversees repairs if needed.</p>

1.4 Site Description

MSGP Reference: Section 6.2.2 and includes subparts 6.2.2.1 (Activities at the facility), 6.2.2.2 (General location map), and 6.2.2.3 (Site map with 23 subparts)

The Granite State Minerals Marine Terminal is **approximately 2.8 acres at 227 Market Street** near downtown Portsmouth, New Hampshire. The terminal operates on the shore of the Piscataqua River in Portsmouth Harbor. Granite State Minerals uses the terminal to berth ships; unload bulk cargoes (primarily road salt); stockpile the cargoes, and load trucks that deliver the salt to public-safety agencies for snow and ice control.

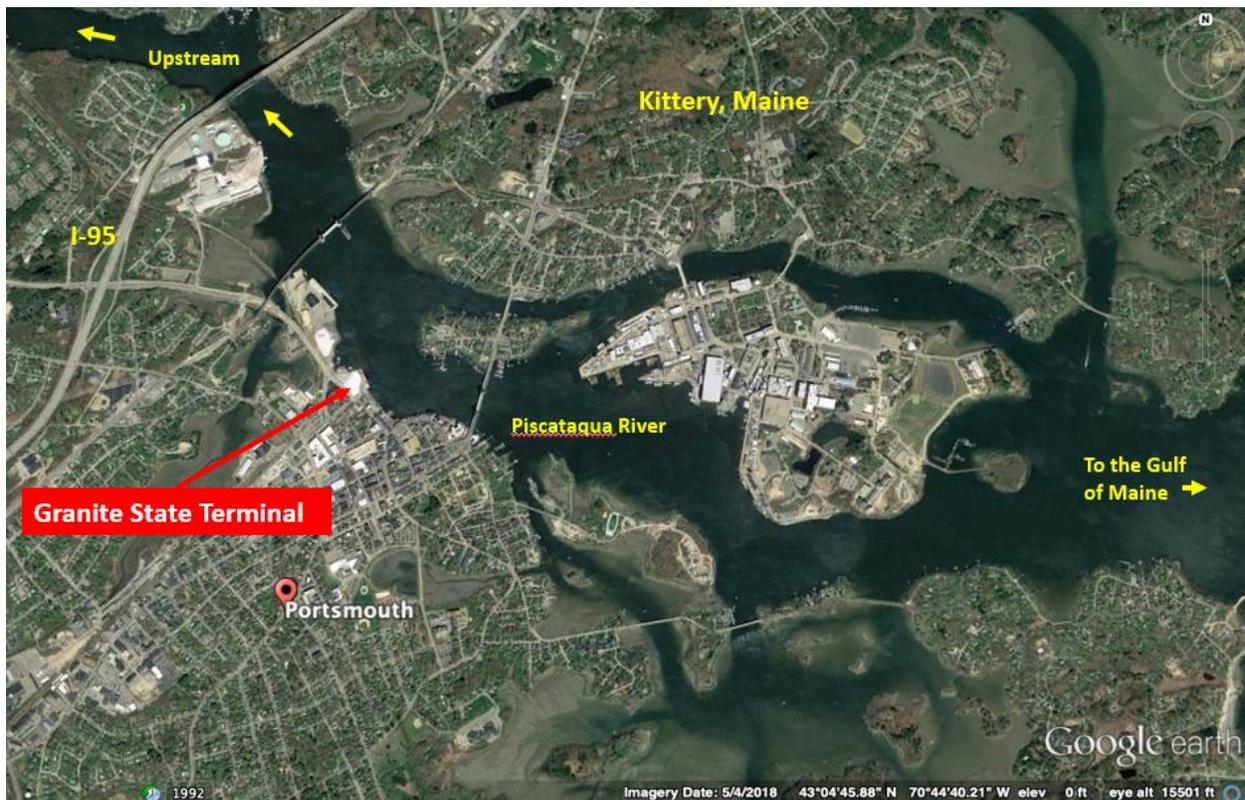


Figure 1: General Location of the Terminal. The Receiving Waterway is the Piscataqua River. Average Salinity is 30 parts per thousand, and the river has a strong tidal current.

1.4.1 Cargo Handling Activities

GOAL: Keep material out of the waterway. STANDARD: Minimize the risk of stormwater transporting material to the waterway.

The flow of activity involves primarily the movement of road salt cargoes from ships to the laydown area to the trucks that deliver the salt to state and local public safety agencies. Subsets of this activity, and the auxiliary support activities, are as follows:

Berthing of Cargo Ships: Oceangoing ships—approximately 500 to 650-foot long—deliver road salt cargoes to the terminal. During docking and departure, river pilots command the ship’s tugboats to assist the maneuvers.

- Does not generally present a stormwater impact
- Terminal needs to be vigilant about oil spills from any vessels, especially if the vessel refuels from a barge while docked at Granite State. Notice to Coast Guard and NH DES required if spill from vessel occurs. **See Cover for emergency telephone numbers.**

Shore Cranes Lift Cargo: Two Manitowoc crawler cranes operate on the pier between the berthed ships and the cargo laydown area. *See* photo at **Figure 3** on page 10 of this SWPPP. Cranes lift buckets filled with salt, then swing to cargo laydown area.

- The terminal should service its buckets annually to reduce leakage of salt during cargo swings.
- Crane operators should release filled bucket at lowest practical and safe elevation in laydown area to reduce risk of fugitive salt dust.
- Crane operators should immediately report any fuel or fluid leaks and countermeasures should be taken to prevent spill into waterway. Spill control measures should be in effect when cranes are refueled or if repair work is conducted on the pier. Clean up grease, if any, near or under cranes.
- **Assist Bulldozers:** The shore cranes also lift small bulldozers into and out of the ship cargo holds. The dozers push salt to the center of the cargo holds so that the bucket loading process is efficient. These operations should be conducted in accordance with the terminal’s *Cargo Dozer Refueling Operations Manual*. The manual is organized in compliance with U.S. Coast Guard regulations, 33 CFR Parts 154 and 156, and has been reviewed by the local Coast Guard Marine Safety Office.



Figure 2: This aerial photograph shows the arrangement of the primary components of the Granite State Marine Terminal.

Loaders and Dozers Build the Pile: As the cranes unload salt to a drop point, front-end loaders carry the salt to the large stockpile. Typically, the stockpile will be shaped with a ramp sculpted into the pile so that machinery can reach the top and consolidate the salt to the height achievable based upon the stockpile's footprint and the salt's angle of repose.

- Loaders and dozers need to be serviced on a regular basis to avoid fuel leaks and to reduce the risk of hose breakage and hydraulic fluid releases.
- Maintenance work should take place in the garage when feasible to reduce contact with rain or snow and to reduce the risk of spillage into the waterway.

Tarp Installed on Pile: When the road salt stockpile is shaped, trimmed and ready for covering, Granite State hires a subcontractor to install a heavy-duty, rip-stop plastic tarp. The cover consists of sections of plastic sheeting, and the contractor uses a hand-held mechanical stitching machine to sew the seams together over thick, textile-backing. To reduce the risk of wind damage, the contractor rigs lines across the pile and uses plastic bags filled with salt to weigh down the lines and form a web over the stockpile.

- Safety is the top priority during the installation of covers, the repair of covers, and the removal of covers. This work should not be performed if wind exceeds 10 m.p.h., or if precipitation is falling.
- The cover needs to be tightly sewn to reduce the risk of moisture finding its way through any seams. Covers need to be inspected on a regular basis to detect tears so that repairs can take place promptly.
- The tarps should reach to the toes of the stockpile.
- Housekeeping needs to remove all cut pieces of cover and other materials so that these items do not fall into the waterway.

Tarp Cut Back for Working Face: When salt-shipment season begins, the terminal cuts back part of the tarp to create a working face. The face should be worked evenly in a left-right and right-left fashion to avoid surrounding the loader crews with near-vertical working faces.

- Safety permitting, the working face should be formed to satisfy the daily orders. As much of the tarp should be left in place as long as is safe and practical in order to reduce the exposure to rain and snow.
- As the cargo-handling crews cut back the tarp, removed sections should be placed in a dumpster for removal and disposal by a licensed hauler.

Delivery Trucks Loaded: Granite State uses frontend loaders to lift salt from the stockpile into 18-wheel tractor-trailers or into salt-spreader trucks.

- Salt residue in the loading area should be monitored throughout the operation, and the operating crew should sweep the area at the end of loading operations.
- Make sure the truck tailgate is secure and not leaking salt. Drivers should be notified of leakage and required to get repairs before returning to the yard.

Trucks Weighed, Loads Covered: After loading, trucks should proceed immediately to the scales.

- Make sure the tailgate is not leaking salt.

- Require all truck drivers to deploy a cover over their truck bed so that only covered loads leave the yard and enter the public way.
- Sweeping and other measures should prevent off-site tracking of salt.

Season's End: When the winter ends, some public-safety agencies do “spring fill-ups” of their salt sheds. When inbound and outbound deliveries of salt come to an end, all remaining inventory at the terminal is covered.

1.4.2 Associated Support Activities

There are several activities that do not directly involve cargo handling, but that are carried out in support of the overall cargo-handling mission of the marine terminal. Some of these activities involve potential risk of stormwater impacts:

Maintenance of Equipment: The general rule is to use the garage—when feasible—to maintain and repair vehicles and equipment. (The cranes cannot fit within the garage.) Some lubrication activities and unplanned repairs (e.g., a broken hose on a vehicle) may require immediate attention outside.

- Any vehicle or equipment repair or maintenance should be conducted indoors if feasible. If rain is falling, measures need to be taken to prevent any lubricants, coolants, fuel, or other fluids from reaching the waterway.
- An adequate supply of Speedy-Dry and cleanup pads and cleanup supplies should be on site, and all yard employees should be trained to use and dispose of these materials. Speedy-Dry or cleanup materials with oil or other fluids in them need to be disposed of in drums or other containers designated for handling, hauling, and disposal by licensed waste transporters.
- Measures to contain spills should be in place during fueling. Dry cleanup of small, non-reportable spills is required so that petroleum residue does not become mixed with stormwater

Refueling: Granite State contracts with a third-party fuel vendor to enter the terminal with a tanker truck to refuel the cranes, loaders, and other equipment. Granite State employees should observe the refueling operation and be prepared to deploy anti-spill measures if a release of fuel occurs.

- Temporary secondary containment should be available for use depending upon site conditions.
- Containment and cleanup equipment should be readily available.

- Employees should observe in order to respond to a spill promptly to avoid material entering the waterway.
- Small spills or residue should be cleaned up immediately with dry cleanup methods and properly disposed.
- Cranes typically remain in position on the crane pads or the crane barge except when temporarily relocated for maintenance or repairs. Extreme care should be used when refueling the cranes.
- Refueling of assist bulldozers on board the ships should be conducted in accordance with the *Cargo Dozer Refueling Operations Manual*. A copy is available in the Terminal Office.



Figure 3: A pair of Manitowoc mobile cranes move the salt cargos from ship to shore.

In connection with preparing the SWPPP, the Pollution Prevention Team confirmed that the facility does not have the capacity to store more than 1,320 gallons of oil and/or fuel. No SPCC is required.

1.5 General Location Map

See The aerial photograph at **Figure 1** page 5 above for the location of the Granite State Minerals marine terminal in Portsmouth Harbor. See also the USGS topographical quadrant and other illustrations in **Appendix A** of this SWPPP.

1.5.1 Site Map

In addition to the Site information illustrated below, *see* the General Arrangement of the Facility in **Figure 2** above on page 7.

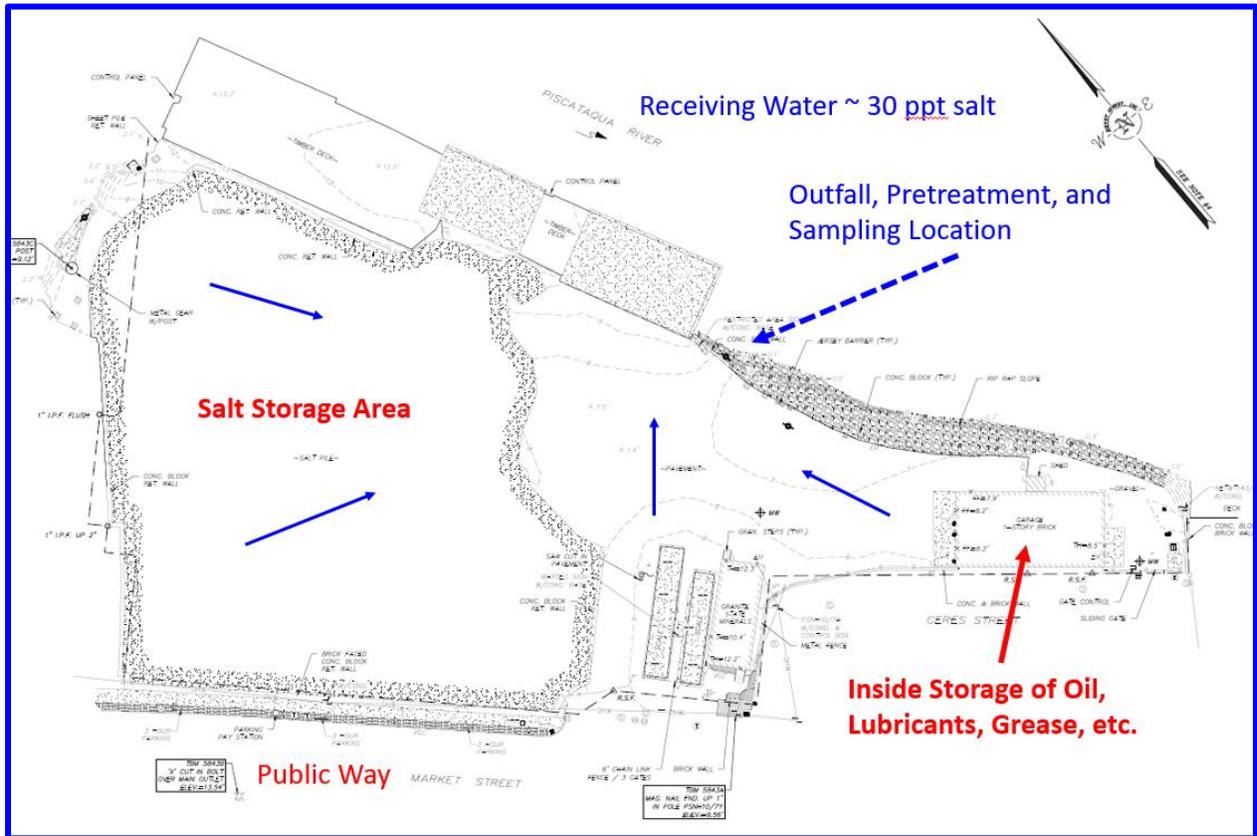


Figure 4: Site Map Marked with Key Features

Figure 4 is from a survey and engineering plan for stormwater management improvements. Site boundaries are the dotted lines in black. Blue solid arrows indicate estimated directions of stormwater flow.

As far as the current ground tenant knows, no spills or releases of a mandatory reportable quantity have occurred at the Site. There are no areas of critical habitat. Other illustrations in this SWPPP identify areas for material handling, truck loading, vehicle refueling, and other industrial activities.

SECTION 2 Summary of Potential Pollutant Sources

See General Permit Section 6.2.3 at page 57.

The information in this section is to include “all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the three years prior to” this SWPPP. *General Permit Section 6.2.3.2.*

General Permit’s Definition of “Pollutants”

Note to SWPPP Team: “Pollutants” are defined officially at 40 CFR 122.2. Appendix A to the GP states: “A partial listing from this definition includes: dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal and agricultural waste discharged into water.”

For purposes of this section, the SWPPP discusses the facility in the context of three sub-areas: (a) the Rock Salt Storage Area; (b) the Garage Area; and (c) the Weight Scales/Treated Salt Area. The facility has two weight scales.

2.1 Potential Pollutants Associated with Industrial Activity

See General Permit Sections 6.2.3.1 and 6.2.3.2 at page 57.

- a. **The Rock Salt Area** covers approximately the western half of the site, and is west of the truck scale. *See **Figures 2** and **4** above.* It is bordered by the timber deck and the Piscataqua River to the north, Market Street to the south, the property boundary to the west, and the truck entrance to the east. A setback separates storage locations from property boundaries. Activities and potential pollutants in this area include:
 - **Cranes** operate in this area, lifting salt from the forward hold of the ship in the berth, swinging the loaded bucket across to the shore, and emptying the bucket onto the drop point on the surface of the wharf. If the crane bucket is not aligned, it can drop **salt residue** under its swing path. The crane is also a source of **fuel, oil, grease, and antifreeze** if not properly maintained and leaks develop or hoses

break. These materials can be exposed to storm water if released during a storm or not cleaned up before a storm.

- **Loaders** operate in this area to build the stockpile. Loaders present the same pollution potential as trucks: drips or spills of **fuel, oil and grease, or antifreeze**.
- **Trucks** travel into this area to queue for loading, to take on loads of salt, and to leave the area for the scales. Trucks present the same potential pollutant risk: **fuel, oil, grease, or antifreeze**. The area needs to be inspected on a regular basis. Small releases of these pollutants **NEED TO BE ABSORBED WITH SPEEDY DRY AND THEN SWEPT**.
- Storm water can contact the **road salt** during truck unloading; during the period when the stockpile is built, shaped, and trimmed; and when the cover is opened in order to load trucks for delivery to public safety and other customers.

b. **The Garage Area**: This sub-area includes the Garage Structure, the shed to the north of the garage, and the exterior areas adjacent to the garage. *See **Figures 2 and 4*** of this SWPPP. The garage includes two roll-up doors and is large enough to accommodate two vehicles for repairs and maintenance. Lubricants are stored inside this building, as are the waste oil drums. Waste oil is removed by a licensed, third-party vendor. Activities and potential pollutants in this area include:

- **Loaders and other equipment** go into and out of the garage for repairs and maintenance and could release oil, grease, antifreeze, or fuel.
- **Employee and visitor cars** may be parked in the area between the site entrance and the garage and could leak oil, grease, antifreeze, and fuel if they were leaking.
- **Materials Stored and Used** in the garage—oil, grease, antifreeze, and other repair and maintenance lubricants—could leak or spill in this area.

c. **Weight Scale Area**: This sub-area contains an office building and two scales used to weigh trucks after they have been loaded with road salt and before they depart the site. Activities in this area of the property include:

- **Trucks** loaded with salt drive to the scale; stop and have their weight recorded; and receive a bill of lading and other documentation for

delivery of the salt to public safety users. Truck could leak oil, grease, antifreeze, and fuel if they have not been properly maintained.

- Loaders present the same potential for pollution as noted in other sub-areas.
- Truck Scales present a risk of salt residue as trucks stop and start on the scales. Pollution prevention also needs to be performed when the scales are recalibrated, greased and painted, or otherwise maintained.

2.2 Spills and Leaks

See General Permit Section 6.2.3.3 at page 57.

No significant spills and leaks of contaminants have occurred at the terminal during the last three years (2022-2024). Small leaks, drips, or spills of fuel, oil, grease, antifreeze, or lubricants have been treated with Speedy Dry, shoveled into storage barrels, and periodically removed from the site by a licensed waste hauler. The locations where potential spills and leaks could occur are identified in the previous section.

2.3 Unauthorized Non-Stormwater Discharges

See General Permit Section 6.2.3.4 at page 58.

In connection with the preparation of this SWPPP, a site inspection conducted on May 25, 2021 by a member of the Pollution Prevention Team, observed no unauthorized non-stormwater discharges. A copy of the inspection report is included in **Appendix D**.

New stormwater management structures were installed at the site in the summer of 2024. Stormwater from the site now runs through an outfall that discharges from a point just south of the pier. These discharges were inspected as part of sampling events in the fourth quarter of 2024 and no unauthorized discharges were observed.

City of Portsmouth records indicate that a city-owned storm drain runs under the terminal from Market Street to the Piscataqua River. The terminal does not have any drains or other access points that connect to the municipal drain.

Oil supplies are inside the garage in aboveground storage tanks of recent vintage. Waste oil barrels and other collection containers are inside the garage. Sanitary systems for workers are self-contained, portable systems.

2.4 Salt Storage

See General Permit Section 6.2.3.5 at page 58.

The Granite State marine terminal handles road salt cargoes that the company distributes to state and local public-safety agencies for winter snow and ice control. The terminal, as evidenced in **Figures 1** and **2** is located on the industrial, urban shoreline of the Lower Piscataqua River in Portsmouth Harbor. The river is a tidal arm of the sea, and published salinity data indicates that average salinity is approximately 30 parts per thousand (ppt) in the action area of the Granite State terminal. Note that full-strength seawater is approximately 35 ppt. Drinking water, on average is less than 1 ppt. EPA considers the division between fresh water and saline waters as 10 ppt. The tidal Piscataqua is the third fastest moving navigable river in the world with tidal currents in the vicinity of Granite State averaging 4 knots (2 meters per second [mph]). *See Army Corps of Engineers Feasibility Report and Final Environmental Assessment at **Appendix I** (Cultural Resources) (July 2014).*

As indicated in Figure 2, the company stockpiles the road salt in the northwest sector of the terminal. The company covers the stockpile through the late spring, summer, and early fall months, and keeps the cover in position as long as possible as the winter snow and ice season approaches.

The stockpile capacity is approximately 105,000 tons of road salt. The amount of salt throughput depends upon the winter weather. Most public safety agencies publish bids for road salt supplies, and most bids impose clauses which require suppliers to have adequate amounts of inventory on hand to satisfy “just in time” orders. The same clauses relieve most state and local government buyers from any obligation to buy salt if there is no snow and ice and no need for deicing supplies.



Figure 5: Example of synthetic tarp fully in place at the Market Street entrance to Granite State Minerals.

2.5 Sampling Data Summary

MSGP Reference: Section 6.2.3.6 at page 58 of the General Permit (“summarize all stormwater discharge sampling data collected at the facility during the previous permit term”)

This section requires a summary of sampling data collected at the facility during the previous General Permit term, *i.e.*, 2015 through 2020. Pursuant to the facility’s Sector Q status (“Water Transportation, pages 172-175 of the 2021 MSGP, SIC Code 4491 “marine cargo handling”), the facility collected water samples in the third and fourth quarters of 2020. Narrative summaries of the analyte results follow:

Sector Q Benchmarks—Through December 31, 2020

Aluminum: Aluminum results for the third and fourth quarters of 2020 were 1.05 mg/L (1,050 ug/L) and 1.11 mg/L (1,110 ug/L). The benchmark during the previous permit term was 0.750 mg/L (750 ug/L), but it has been raised to 1.1 mg/L (1,100 ug/L) under the new permit. While both were exceedances under the old permit, under the current permit, the results were under and just slightly over the

new benchmark. Samples were collected from the pavement surface as the site does not currently have an outfall.

Lead: Under the previous permit and the 2021 General Permit, the benchmark for total recoverable lead—if the receiving water (like the Piscataqua River) is saline—is 210 ug/L (0.210 mg/L). No exceedances were recorded in the previous permit term.

Zinc: Under the previous permit and the 2021 General Permit, the benchmark for total recoverable zinc when the receiving water is saline is 90 ug/L (0.090 mg/L). No exceedances were recorded in the previous permit term.

Iron: Total recoverable iron is no longer a Sector Q Benchmark. The facility did sample for iron during the previous permit period and had exceedances of the 1,000 ug/L (1.0 mg/L) benchmark.

Indicator Sampling

Under the previous General Permit, “Indicator Monitoring” for certain sectors was not a requirement. Going forward, Indicator Monitor/Sampling will be required for facilities that have a primary or co-located Sector P (Land Transportation and Warehousing). Because seasonal busy truck traffic occurs at the terminal in the fall, winter, and spring, Granite State identifies its secondary activity as a Sector P form of work. Consequently, in the 2021 permit period, “Indicator Monitoring” is required for the following analytes:

- **pH** is a value on a logarithmic scale from 1 to 14 that measures the acidity of water. Materials on the low end of the scale are more “acidic” and cause the release of hydrogen ions. Materials on the high end of the scale absorb a hydrogen ion and are more “basic.” A water sample with a pH of 7.0 is ten times more acidic than a sample with a pH of 8.0. The higher value is ten times more basic than the lower one. When pH of water is too high or low, it kills aquatic creatures. pH extremes can also make toxic chemicals and heavy metals more soluble. Most aquatic creatures tolerate a pH range of 6.5 to 9.0. Humans can tolerate 4.0 to 11.0. **Under the General Permit, the preferred range of pH is 6.0 to 9.0.**
- The facility has not previously tested its water samples for pH. It will be necessary to do so going forward. pH values will need to be measured and recorded at the time of sampling.

- **Total Suspended Solids (TSS)** are particles larger than 2 microns found in the water column. For perspective, the average human hair is approximately 70 microns in width. TSS includes anything drifting or floating in the water—sediments, silt, sands, gravel, clay, plankton, algae, organic particles from decaying plant and animals. Note that salt ions can collect suspended particles, bind them together, and cause them to settle to the bottom due to the increase in weight. High levels of TSS increase water temperature and decrease dissolved oxygen levels.
 - Although not mandated under the previous permit, the facility collected TSS data as an indicator of housekeeping quality. Although there is no indicator concentration in the General Permit, sectors that require TSS benchmarks focus on the 100 mg/L standard. TSS data samples did not exceed 100 mg/L during the previous permit period.

- **Chemical Oxygen Demand (COD)** is a testing method to measure the amount of materials in the water column that react with oxygen and thereby remove it from the water column—lowering the amount of dissolved oxygen used by aquatic wildlife and plants.
 - Note that COD measurement is significantly affected by salt in the water sample. Laboratory COD results for samples with some salt content are generally skewed and unreliable.
 - The facility did not collect COD data during the past general permit period.
 - **Biological Oxygen Demand (BOD)** is an alternative test not vulnerable to the skewing caused by salt in the water. BOD typically has a 1 to 4 ratio compared to COD data, and the BOD benchmark, when applicable, is 30 mg/L. The facility did collect BOD data during the past general permit period, with results under this threshold. **Under the 2021 General Permit, the facility should also collect BOD data in order to put the COD results in proper context.**

Indicator monitoring is now also required for facilities in Sector Q (SIC Code 4491). These facilities must monitor stormwater discharges for the 16 individual priority pollutant PAHs identified at Appendix A to 40 CFR Part 423. These are: naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, indeno[1,2,3-

c,d]pyrene, and dibenz[a,h]anthracene. Samples must be analyzed using EPA Method 625.1, or EPA Method 610/Standard Method 6440B if preferred by the operator, consistent with 40 CFR Part 136 analytical methods. The facility has not previously monitored for these analytes.

Impaired Water Sampling

The Lower Piscataqua River is an impaired waterway. It does not, however, have a TMDL. Although the latest NH DES information indicates the TMDL Priority is low, State Pier SWPPP and other reports indicate impairments exist for Estuarine Bioassessments, PCBs, and Dioxin (including 2,3,7,8-TCDD). EPA has confirmed that no impaired waters monitoring is required for these impairments.

See excerpt from NH DES map database on next page.

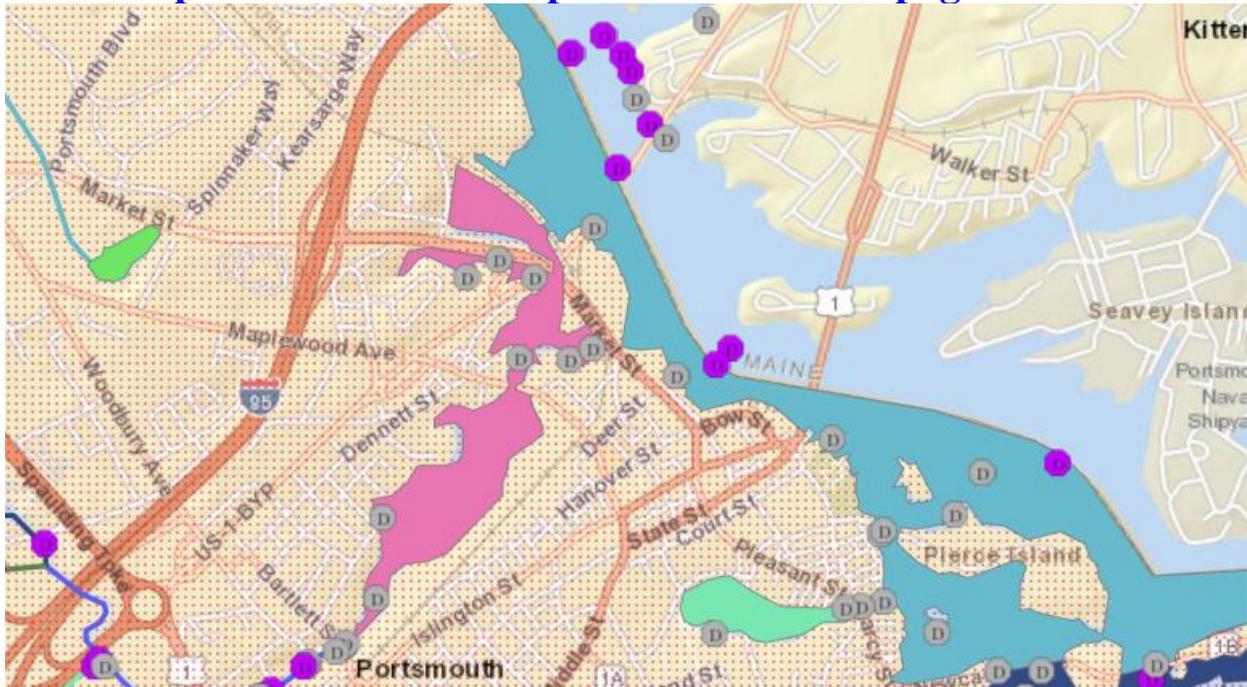


Figure 6: Excerpt from NH DES map database for impaired waterways. The turquoise color in the river is Category 2 under the State system, but is not Federal Tier 2, 2.5, or 3.

Effluent Limitations

The facility does not conduct any activities that trigger the applicability of effluent limitations and the testing of analytes subject to the limits.

SECTION 3: Description of Stormwater Control Measures for Technology-Based & Water-Quality Based Effluent Limits

See General Permit at Part 2 (pages 17-26), Part 8 (Sectors Q and P), and Section 6.2.4 at page 58.

The SWPPP Team must document the location and type of control measures chosen and/or designed to comply with the Multi-Sector General Permit. *See the General Permit at Section 6.2.4, page 58.*

3.1 Non-Numeric Technology-Based Effluent Limits

For purposes of the General Permit, the term “Effluent Limitations” is defined in the General Permit as “any of the Part 2 requirements” set forth from pages 17 to 26 of the General Permit. *See MSGP Appendix A definitions at page A.3 of 11.* “Non-Numeric Technology-Based Effluent Limits” include the following. The numbers below refer to the Section Numbers in the General Permit:

- 2.1.2.1: Minimize Exposure (*page 19*)
- 2.1.2.2: Good Housekeeping (*page 20*)
- 2.1.2.3: Maintenance (*page 20*)
- 2.1.2.4: Spill Prevention and Response (*page 21*)
- 2.1.2.5: Erosion and Sediment Controls (*page 22*)
- 2.1.2.6: Management of Runoff (*page 22*)
- 2.1.2.7: Salt Storage Piles (*page 22*)
- 2.1.2.8: Employee Training (*page 23*)
- 2.1.2.9: Non-Stormwater Discharges (*page 23*)
- 2.1.2.10: Dust Generation and Vehicle Tracking (*page 23*)

Granite State, with the assistance of Tighe & Bond, is ***prepared to submit permit applications*** to obtain permission to construct the following site controls:

- **Modify the grade or Install Berm** at the site to reduce the amount of stormwater contacting or running under the salt stockpile.

- **Installing Cape Cod berms** at several perimeter locations to reduce the risk of sheet flow reaching the waterway by redirecting stormwater flow.
- **Installation of a separator** capable of segregating oil and grease, solids, and floatables before stormwater discharge. Include sufficient infrastructure for sampling station and potentially more treatment.

3.1.1 Minimize Exposure: (Section 2.1.2.1)

- **Containment Measures:** In all salt storage locations, the toe of slope of salt piles should be bordered by hay wattles, temporary clay berms, or folded tarps to minimize the discharge of salt in contact with stormwater.
- **Cleanup Spills and Leaks:** Employees will be trained to (a) identify and report spills or leaks and to (b) clean them up using dry-absorbent methods as promptly as is feasible.
- **Covering Materials:**
 - Lubricants, waste oils, and other potential pollutants must be kept inside the garage. Only a licensed hauler may remove.
 - For covering of salt piles, see Section 3.1.7 below.
- **Inspect Machines and Equipment:** This shall be done on a regular basis: before the use of each machine and at the conclusion of the machine's or equipment's operation. Leaks or other potential pollution sources shall be reported to the site manager or company mechanic and immediate measures will be taken to contain or eliminate any dripping or other release. If a machine breaks down during operation, prompt measures must be taken to contain and cleanup any release of fluids.

3.1.2 Good Housekeeping: (Section 2.1.2.2)

- **Sweeping or Scraping:** Employees will sweep up or scrape up salt or other materials when practicable under prevailing weather conditions. The General Permit states: "Sweep or vacuum at regular intervals." *See page 20.* Training will emphasize the importance of sweeping or scraping on a frequent basis, and not leaving residue on the hard surfaces to the extent that it is feasible to avoid. Training shall emphasize the connection between diligent housekeeping and the minimization of any solids or salt being carried away by stormwater.

- **No Detergents:** If any wash down of pavement takes place, no detergents or hazardous cleaning products may be used. *See the General Permit at Section 1.1.3.1 at page 2.* Before any washing takes place, oil and grease must be cleaned up using dry absorbents. The area should also be swept or scraped before any wash down.
- **Dumpster:** Should only be used for dry, solid, non-hazardous waste. For example, speedy dry used to clean up spills and leaks must go to the waste oil collection area, *not* the dumpster. Keep the dumpster lid closed when not in use, cover with a tarp, or have containment around the base. If tarp sections go into an uncovered roll-off, make sure they are free of waste before disposal.
- **Appropriate Storage:** Materials, tools, equipment, and waste must be stored properly. Storage in containers should be used when available. Waste oil and similar liquid waste must be stored inside the garage and removed by a licensed hauler on a regular schedule.

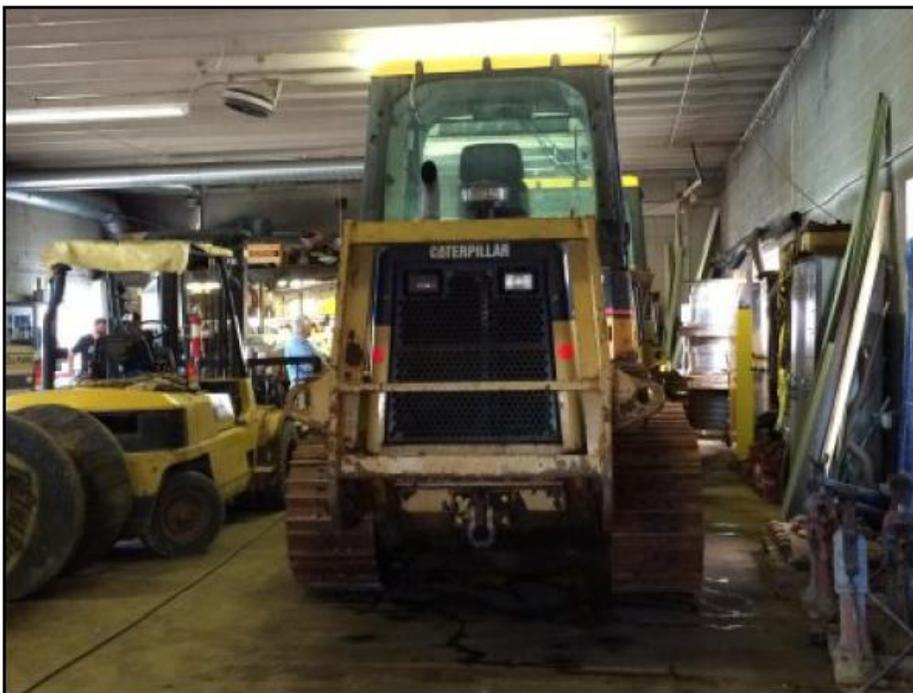


Figure 7: The Facility should stress indoor storage of vehicles, equipment, and supplies.

- **Wheel Tracking:** During shifts when vehicle deliveries of salt are inbound or outbound, the shift crew must monitor the entrance/exit points to report any vehicle tracking so that measures to eliminate off-site tracking may be implemented

- **Trash and Debris**: Minimize the potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.

3.1.3 Maintenance (Section 2.1.2.3)

The General Permit, *see pages 20 and 21*, requires the PPT and all facility employees to maintain all control measures in effective operating condition. The control measures—housekeeping, covers, engineered devices—are the mechanisms used to achieve the effluent limits in the General Permit. In addition, all industrial equipment and systems must be in good working order to minimize pollutant discharges. This includes:

- Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems that could fail and result in contamination of stormwater.
- Diligently maintaining non-structural control measures (e.g., keep spill response supplies available, personnel appropriately trained).
- The General Permit requires cleaning of catch basins if the depth of debris reaches two-thirds ($\frac{2}{3}$) of the sump depth. The debris surface must be at least six inches (6”) below the outlet pipe.

Maintenance Deadlines (Section 2.1.2.3[b]) MSGP at page 21

If a Control Measure needs routine maintenance: “**YOU MUST CONDUCT THE MAINTENANCE IMMEDIATELY IN ORDER TO MINIMIZE POLLUTION DISCHARGES.**”

If a Control Measures needs to be repaired or replaced:

- “**IMMEDIATELY TAKE ALL REASONABLE STEPS TO PREVENT OR MINIMIZE THE DISCHARGE OF POLLUTANTS.**” THIS INCLUDES CLEANING UP CONTAMINATED SURFACES.
- **MAKE FINAL REPAIR OR REPLACEMENT “AS SOON AS FEASIBLE BUT MUST BE NO LATER THAN ... 14 DAYS.”**
- **IF TWO-WEEK TIME FRAME IS INFEASIBLE, COMPLETE NO LATER THAN 45 DAYS.**
- **IF REPAIR OR REPLACEMENT WILL TAKE LONGER THAN 45 DAYS, YOU MUST NOTIFY EPA AND DOCUMENT REASONS FOR DELAY IN THIS SWPPP.**

3.1.4 Spill Prevention and Response: (Section 2.1.2.4) MSGP pp. 21-22.

The General Permit requires the SWPPP Team and facility personnel to minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur in order to minimize pollutant discharges. The SWPPP Team must conduct spill prevention and response measures, including but not limited to the following:

- **Labels:** Plainly label containers (e.g., “Used Oil,” “Spent Solvents,”) that could be susceptible for spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.
- **Indoor Storage:** The property contains a garage. Use it for the storage and handling of oil and other lubricants. Use it also for the storage of any waste oil or other material to be picked up and transported by a licensed hauler. Implement procedures for material storage and handling, including the use of secondary containment.
- **Promptly Clean Up** spills and leaks using DRY METHODS.
- **Leaky Vehicles:** “Use drip pans and absorbents if leaky vehicles and/or equipment are stored outdoors.” (*page 21*).
- **Training:** Site crew must have regular training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases that may occur in the yard. As appropriate, execute cleanup procedures as soon as safely possible.
- **Spill Kits:** An adequate supply of Speedy Dry must be kept inside the garage. Site crew must receive regular training in the deployment of Speedy Dry wherever needed on the site. Speedy dry must be cleaned up and put in a barrel inside the garage for removal by a licensed waste hauler.
- **Notification:** Notify appropriate facility personnel of a leak, spill, or any release. If a reportable quantity of oil or other material has been spilled, notify the appropriate government agencies. State information <https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/rem-13.pdf>

Notification, "Contaminated Sites Management" Env-Or 604.06

Any responsible party or other person having knowledge of a discharge of oil shall report such discharge to the NHDES Waste Management Division immediately (603) 271-3899 (Monday through Friday, 8 a.m. to 4 p.m.), or to the New Hampshire State Police Dispatch at (603) 223-4381 (24 hours/day), unless **all** five of the following conditions are met:

1. The discharge is less than 25 gallons.
2. The discharge is immediately contained.
3. The discharge and/or contamination is completely removed within 24 hours.
4. There is no impact or potential impact to groundwater or surface water.
5. There is no potential for vapors which pose an imminent threat to human health.

The Coast Guard requires a report for "a sheen upon the water."

See Emergency Call Numbers Below or on Cover of SWPPP.

National Spill Response Number: 1-800-424-8802
United States Coast Guard, New Castle, NH: 1-603-436-4415.

NH Dept. Env. Services Spill Response: 1-603-271-3899 (Business Hours)
Weekend & Evening Spill Response: 1-603-223-4381 or State Police
Portsmouth Fire Department: 1-603-427-1515 (or 911)

3.1.5 Erosion and Sediment Controls: (Section 2.1.2.5) MSGP page 22

The General Permit requires the SWPPP Team and facility personnel to minimize erosion by stabilizing exposed soils.

- **Exposed soils** like piles of dirt or exposed, barren soils should not be maintained on the site. If any soils or dirt are exposed, they should be stabilized, covered, contained, or otherwise maintained so that erosion does not occur and so that dirt is not picked up by rain or snow melt.

- **Planters** around any building should be maintained so that dirt does not erode onto paved areas.
- **Inspections** will note any erosion or potential erosion issues and the inspector will report them to the Terminal Manager.
- Wattles, and other **sediment barriers** will be inspected (and refreshed as needed) on a monthly basis.

3.1.6 Management of Runoff: (Section 2.1.2.6)

See page 22 of the General Permit for information about this task. Containment walls and Cape Cod berms (when installed), the stormwater manufactured treatment device (3.1.7), the stockpile covers (when covered), and hay wattles and catch-basin socks are the primary management devices for the management of runoff.

The terminal is in a Portsmouth, New Hampshire's industrial harbor area, and it abuts a very busy **saltwater** shipping channel for oil tankers, other large cargo ships, tugs, and barges. Salinity in Portsmouth Harbor is approximately 30 ppt. The terminal requires a hard surface for its marine industrial activities. The terminal should not have any capacity for infiltration of stormwater. The terminal was developed in the 1800s as an industrial marine terminal handling coal and other cargo. Prior owners and operators enlarged it over the course of the 1800s and 1900s to its current dimensions. What materials were used in the past to fill in existing wharf areas has not been documented. For salt storage, and in light of the fact that in the past fill materials were not monitored as strictly as they are today, a hard surface without infiltration should be maintained.

3.1.7 Manufactured Treatment Device (MTD)

Contech StormFilter® System

In order to mitigate pollution from leaving the site, the Terminal has installed an underground manufactured treatment device (MTD). The water quality structure that was installed is a StormFilter® Peak Diversion system (#SFPD0824), designed by Contech ES. It is comprised of an underground vault equipped with 18" Phosphosorb® cartridges and became active in 2024.

Phosphosorb® is a lightweight media built from a Perlite base that removes total phosphorus (TP) by absorbing dissolved-P and filtering particulate-P simultaneously. The MTD should be inspected annually and after major storm events. A properly functioning system will remove solids from water by trapping particulates in the porous structure of the filter media inside the cartridges. The flow through the system will naturally decrease as more and more particulates are trapped. Eventually the flow through the cartridges will be low enough to require replacement.

Regular inspections of the MTD will ensure maintenance occurs at the correct time. Maintenance requirements and frequency are dependent on the pollutant load at the site but should occur when inspections denote the sediment load is such that the filter cartridges are beginning to become occluded and sediment is building up, either on top of the cartridges or on the vault floor. Maintenance activities may be required in the event of a chemical spill or due to excessive sediment loading from site erosion or extreme storms.

It may be necessary to adjust the inspection maintenance schedule depending on the actual operating conditions encountered by the system. In general, inspection activities can be conducted at any time, and maintenance should occur, if warranted, during dryer months in late summer to early fall. Maintenance requires the use of a vac truck and qualified stormwater professionals with confined space certification.

3.1.8 Salt Storage Piles: (Section 2.1.2.7)

The primary activity of the facility is to receive road salt by ship at the marine terminal; build the road salt into stockpiles maintained for use in the winter by public safety agencies and other de-icing, road-clearing entities; load the road salt as needed into delivery trucks; and dispatch the delivery trucks to public safety depots and similar entities. Salt will typically be delivered to the property in the spring or early summer, but deliveries in other seasons occasionally occur. Depending upon how much it snows in the winter, varying quantities of road salt will remain onsite at the end of the winter season. State and local public safety agencies do not buy the salt if it does not snow, so a mild winter will leave the company with a large inventory on hand.

Factors affecting inventory are the “just in time” delivery system demanded by public safety customers; the lack of storage capacity at inland depots; the short window of time in which orders must be met (24 to 72 hours); the 6-week to 12-

week timeline from getting salt from an overseas mine to Portsmouth Harbor; and the fundamental unpredictability of long-term weather forecasts.

After stockpiles are built, shaped, and trimmed, they should be covered with synthetic tarps as soon as practical under prevailing weather and safety conditions.

The numerous steps involved in building a road salt stockpile, shaping and trimming it, deploying covers, and securing the covers in place are set forth in the 12 images below.

[See Next Page for Salt Pile Building and Covering Process](#)



① Salt is unloaded from the ship.



② The salt is transported into the stockpile areas.



③ Front-end loaders build the pile.



④ Once the salt is moved into the stockpile areas, loaders and dozers shape the pile to be covered.



⑤ Vinyl tarps are carried by loaders to the top of the pile. Each roll weighs approx. 500lbs.



⑥ One at a time, tarps are unrolled and spread over the pile. Each tarp is approx. 60' x 250'.



⑦ One at a time, tarps are laid over the surface of the salt pile.



⑧ Weighted bags are tied onto cables that are pre-laminated into the tarp.



⑨ The weighted bags are placed in an approx. 10' grid that holds down the tarp against uplift.



⑩ A seamster climbs up and down the pile along the seams between tarps.



⑪ Adjacent tarps are stitched together with an electric sewing machine like panels in a quilt.



⑫ The final cover is a waterproof skin that snugly encases the unique contours of the salt piles.

See Important Points Set Forth Below:

- It can take numerous days to stockpile, trim, and shape the road salt. Once the trimming and shaping is completed, and when covering is practicable, synthetic tarps will be rolled across the stockpile, sewn together by hand-held machinery, sealed at the seams, weighted down, and secured with ropes.
- Worker safety demands that covering operations be temporarily suspended if the wind speed exceeds 10 m.p.h. or if precipitation makes conditions unsafe for the covering crew.
- During seasons of active delivery of road salt to public safety agencies, primarily the fall and winter road salt seasons, the covers will be cut back from the stockpile and a working face will be open. There are also times when the delivery of salt to the terminal, the constant need to ship out salt, and the variable state of the weather makes the installation or re-installation of the covers infeasible.

3.1.9 Employee Training (MSGP Section 2.1.2.8)

The SWPPP Pollution Prevention (PPT) Team and all employees who work in areas where industrial materials or activities are exposed to stormwater must be trained. They must understand the requirements of the permit and their specific responsibilities with respect to those requirements. The PPT and all other relevant personnel must be trained in at least the following if related to the scope of their job duties. **Training must take place at least once per year for all employees.**

- A short overview of the purposes and polices of the Clean Water Act and also the impact of pollution on water quality.
- An overview of the contents and information in this SWPPP.
- A recognition of and an ability to identify pollutants: oil, grease, or other chemical fluid that is leaking, dripping or spilled; salt residue after loading or unloading operations; trash or other litter that can reach the waterway.
- Know-how and initiative to address pollution removal and not just leave it.
- Spill response procedures and duty to report.
- Good housekeeping, maintenance, and material management.
- Location of stormwater controls and how they are to be maintained.
- Proper procedures for pollution prevention.
- Proper identification, labeling, and storage of bottles or other containers holding oil, grease, or hazardous material.

- Proper identification, labeling, logging, storage, and disposal of waste oil and other chemicals or hazardous material.
- How and when to conduct inspections, make records of findings, keep records, and take corrective actions.
- **Employee Training will take place:**
 - ✓ Under the supervision of the Terminal Manager as a regular aspect of terminal operations. The TM may designate, a member of the PPT to conduct the training.
 - ✓ Training sessions for stormwater issues may be combined with the quarterly safety sessions. Individual employees will receive training and review training materials at least once per year.
 - ✓ The content of the training will focus on the importance of minimizing the pollution of stormwater and the release of any pollutants into the waterway. BMPs and other stormwater management controls or measures will be identified and explained. Pollutants will be identified. Inspection procedures, leak identification and response, and spill prevention and response will be reviewed. The chain of command will be described and reporting obligations will be explained and identified.

The Terminal Manager will implement measures to log training sessions and to document that employees have been trained. The Training Log should be maintained in **Appendix F** of this SWPPP.

3.1.10 Non-Stormwater Discharges (MSGP Section 2.1.2.9)

No discharge of anything other than storm water – rain or melting snow – is authorized under this General Permit. There are a few limited exceptions such as fire hydrant flushing, or a restricted form of washdown. All oil and grease or other material like salt must have been removed by dry cleanup methods before any surface may be washed. No detergents or other chemicals may be used in any washing process.

If any employee observes a non-stormwater discharge at or leaving the property, it must be reported to the Site Manager immediately so that it can be identified and dealt with according to regulatory or other requirements.

3.1.11 Dust Generation & Suppression (MSGP Section 2.1.2.10)

Minimize dust by suspending loading and unloading operations in strong winds. Vehicles should operate in the terminal only at very slow speeds to minimize fugitive dust. The size of the terminal, with its relatively tight maneuvering room, is such that safety needs also mandate low vehicle speeds. Other measures may be implemented, but any misting or similar activity should not be so heavy as to cause drainage into any catch basin or to any off-site location.

3.1.12 Waste, Garbage, etc.

Solid waste, litter, and garbage must be picked up promptly from any surface area and placed in the dumpster. If a dumpster is used, it should be placed in a covered position or have a lid to prevent exposure to stormwater. If outside without a cover, a containment system around the dumpster should be established. The dumpster should be inspected for leaks, which should be repaired promptly. The dumpster should also be emptied by a licensed hauler on a regular schedule.

3.2 Numeric Effluent Limits (MSGP Section 2.1.3)

The regulated activities identified in the “Numeric Effluent” provisions of the General Permit (log spray down; phosphate fertilizer manufacturing; asphalt emulsion; cement pile storage; dewatering at crushed stone, sand, and gravel mining; waste landfilling; coal storage; airfield deicing) ***do not take place at the Granite State Minerals marine terminal.***

3.3 Sector-Specific Non-Numeric Effluent Limits (Section 8)

Sector-specific requirements for Sector Q (Water Transportation) and Sector P (Land Transportation and Warehousing) are set forth in the General Permit at pages 172-175 for Sector Q and pages 169-171 for Sector P. Additional sector-specific inspection and monitoring requirements are set forth in sections below concerning those topics.

Discharges from vehicle/equipment/surface wash water, including tank cleaning operations are prohibited. Discharges from vessels including bilge and ballast water, sanitary wastes, pressure wash water, and cooling water are also prohibited. Such discharges must be authorized under a separate NPDES permit, discharged to a

sanitary sewer in accordance with applicable industrial pretreatment requirements, or recycled on-site. Training must be completed at least once per year and include the following topics (in addition to other topics relevant to the facility) in the training: used oil and spent solvent management; fueling procedures; general good housekeeping practices; proper painting procedures; and used battery management.

Good Housekeeping requirements are restated below. EPA's guidance for Sector P good housekeeping and stormwater management is contained in **Appendix P** to this SWPPP, and guidance for Sector Q is set forth in **Appendix Q**.

- **Minimize Exposure to leaking or leak-prone vehicles:** implement control measures such as the following, where determined to be feasible (list not exclusive): using of drip pans under vehicles/equipment; storing vehicles and equipment indoors; installing berms or dikes; using of absorbents; roofing or covering storage areas; and cleaning pavement surfaces to remove oil and grease.
- **Minimize exposure to fueling areas:** Where determined to be feasible: cover the fueling area. *This is most effectively addressed by all vehicle fueling taking place in a specified location with containment in place.* Use spill/overflow protection and cleanup equipment; minimize stormwater run-on/runoff to the fueling area; use dry cleanup methods.
- **Used oil, spent solvents, and similar materials:** Maintain the drums or vessels in which these are stored to avoid leaks or stormwater access. Plainly label all containers. Keep all containers inside the container inside the garage until they are removed by a licensed waste hauler. Use dry cleanup methods.
- **Vehicle and equipment maintenance:** where determined to be feasible (list not exclusive): perform maintenance activities in dry weather or under cover; use drip pans; keep an organized inventory of materials used in the shop; drain all parts of fluid prior to disposal; prohibit wet clean up practices if these practices would result in the discharge of pollutants to stormwater drainage systems; use dry cleanup methods.

3.4 State-Specific Requirements (MSGP Section 9)

New Hampshire requires that permittees consider opportunities for on-site infiltration of stormwater. As discussed above, the terminal should not have any

capacity for infiltration of stormwater. For salt storage, and in light of the fact that a hard surface is required for operations, and the fact that in the past fill materials were not monitored as strictly as they are today, a hard surface without infiltration should be maintained.

3.5 Water Quality Effluent Limits and Standards

Section 303(d) of the Clean Water Act requires each state to submit a list of impaired waters to the US EPA every two years to identify surface waters that are impaired by pollutants, not expected to meet water quality standards within a reasonable time, and require the development of a Total Maximum Daily Load (TMDL) study.

Piscataqua River: The Piscataqua River is the surface water that receives stormwater from the facility. The river is tidal. *See **Figures 1, 2, and 4.***

The “Lower Piscataqua River,” identified by NHDES as assessment unit NHEST600031001-02-02, is an impaired water within the scope of Appendix A of the General Permit. According to the *State of New Hampshire 2018 Section 303(d) Surface Water Quality List*, this segment of the river is Category 5. This means that this segment of the river is classified as being in need of a “Total Maximum Daily Load,” or “TMDL,” but does not yet have one. Listed impairments are:

- Estuarine Bioassessments
- Polychlorinated biphenyls
- Dioxin (including 2,3,7,8-TCDD)

US EPA Region I Guidance does not require monitoring for these pollutants. We have confirmed with Region I that no monitoring is required.

4.0 Schedules and Procedures

The General Permit, at pages 26–30, contains information about the scheduling and procedures associated with the activities described below:

4.1 Routine Facility Inspections (MSGP Section 3.1)

Store waste oils, antifreeze and other wastes temporarily in vendor-supplied containers. The facility’s licensed waste-hauling vendor should remove these

materials in accordance with calls by the facility to the licensed vendor or scheduled visits by the licensed vendor. The Pollution Prevention Team should send manifests and other records to the company's main office and to NH DES as required.

The General Permit, at Section 3.1.4 on page 27, requires a routine inspection at least once every calendar quarter (i.e. January to March / April to June / July to September / October to December) by Qualified Personnel including at least one member of the PPT. In order to encourage good housekeeping and compliance, Granite State will do a routine inspection at least once per month.

Areas that must be inspected include, but are not limited to,

- Waste storage area;
- All control measures;
- Discharge points;
- Locations where spills and leaks have occurred in the past;
- Locations where potential pollution sources are located;
- Storage areas for vehicles and equipment awaiting maintenance;
- Fueling areas;
- Vehicle and equipment maintenance areas;
- Material storage areas;
- Vehicle and equipment cleaning areas;
- All areas where materials, equipment, and activities are exposed to stormwater (assume that all areas of the salt storage area, salt unloading and loading areas, and truck scale and office area contain industrial activities or materials exposed to stormwater).

Inspections should include, but are not limited to, observation or looking out for:

- Industrial materials, residue, or trash that may come into contact with stormwater;
- Leaks or spills;
- Accurate recordkeeping;
- Proper labeling;
- Offsite tracking;
- Erosion;
- Non-authorized discharges;
- Control measures needing replacement, maintenance, or repair.

At least once every year, the routine inspection must take place in the rain or when snow is melting and a stormwater discharge is occurring.

The regular inspection, testing, maintenance, and repair of all control measures will occur as follows:

- **Monthly Inspections** will include the entire terminal. The inspector should conduct the inspection in accordance with the detailed monthly inspection forms.
- **Inspection Forms** should be filled in and signed at the time of the inspection. The inspector shall send one copy to the Main Office. Completed inspect forms are maintained in **Appendix E** of this SWPPP.
- **Repairs:** If inspections reveal the need for repairs, the facility should schedule them promptly and implement them as soon as feasible. The facility should maintain records of repairs in **Appendix E**.
- **Mandated Timeline:** The General Permit requires:

Immediately take all reasonable steps to prevent or minimize the discharge of pollutants. This includes cleaning up contaminated surfaces. **Make final repair or replacement as soon as feasible but must be no later than ... 14 days.** **If two-week time frame is infeasible, complete no later than 45 days.** **If repair or replacement will take longer than 45 days, you must NOTIFY EPA and document reasons for delay in this SWPPP.**

4.2 Quarterly Visual Inspections (MSGP Section 3.2)

The General Permit requires the terminal to collect a storm water sample each calendar quarter: (1) January through March (2) April through June (3) July through September (4) October through December.

During the first 30 minutes of a storm that creates a discharge of storm water through the outfall, the inspector should collect a sample in a clean glass and examine the water in a well-lighted area. The inspector shall record observations on a form listing characteristics of water quality: color; odor; clarity; floating solids; settled solids; suspended solids; foam; oil sheen; and other obvious indicators of pollution. **When anticipated upgrades take place (pursuant to pending permit applications), the onshore infrastructure shall include a safe location to collect the quarterly visual sample.**

Any pollution conditions observable in the sample require investigation of the cause of the condition, **corrective action if needed**, and documentation of the corrective action.

A **qualifying storm must produce at least 0.1-inch of measurable rain**, and it must occur at least 72 hours (3 days) after the last measurable precipitation in the area. Along with the inspection form, the terminal must also make a record of the storm event. The record shall include date, duration of storm in hours, rainfall total in inches, time since the previous measurable storm. Weather data is available at this web site: www.wunderground.com

During one quarter of the year, the visual sample is supposed to be from snowmelt discharging through the outfall.

Company management or the Terminal Manager shall train and designate qualified inspectors.

A sample of the Quarterly Visual Monitoring Form is included in **Appendix F** of this SWPPP. Completed forms are to be submitted to the facility office, the company main office, and to **Appendix G** of this SWPPP.

Note that visual evidence of pollution in quarterly sample requires Corrective Action to address cause and minimize pollution. See Part 4 of the General Permit.

4.3 Monitoring (Section 4)

The General Permit requires “Indicator Monitoring,” “Benchmark Monitoring,” and “Impaired Water Monitoring” to be conducted consistent with the procedures and requirements outlined below.

4.3.1 Water Sampling Procedures

Each of these types of monitoring require the collection of water samples from the Marine Terminal’s stormwater discharges, and the submission of those samples for laboratory testing.

Care needs to be taken in the collection and shipment of samples:

- **Qualifying Storm:** A **measurable rain event of at least 0.1 inch of rain** that occurs no sooner than 72 hours (three days) after the last measurable rain event in the area. Storm data can usually be confirmed at the following web site: www.wunderground.com
- **Sampling Procedure:** *The inspector must have clean hands and dust-free garments. New, latex gloves for the hands are preferred. Do not contaminate the samples!* Using a clean glass or plastic container, the inspector shall collect samples of water from the discharge point within the first 30 minutes of observing a discharge or as soon as practicable after that. The inspector shall pour each sample into a separate laboratory sample bottle from the bottles provided by the laboratory. NOTE THAT DEPENDING UPON THE MATERIAL TO BE SAMPLED, EACH BOTTLE MAY HAVE A SEPARATE INSTRUCTION. BOTTLES SHOULD BE COMPLETELY FULL WITH NO AIR POCKET BEFORE BEING SEALED. The inspector shall place the samples in ice and deliver them promptly to the laboratory within acceptable time limits.

4.3.2 Indicator Monitoring (See pages 34-36 of the GP)

The facility is subject to two “Indicator Monitoring” requirements. These requirements are “**report only**”—the laboratory values must be reported to EPA—and do not automatically trigger a corrective action requirement. Data, however, should be reviewed to determine if pollution is occurring and if actions to minimize it or prevent it are in order. **Indicator Monitoring** requires the collection of water samples during a qualified storm event (more than a tenth of an inch of rain).

Because some industrial activities at the terminal are **Sector P** land transportation (trucks pickup salt and take it to public-safety agencies) and warehousing (storage of large inventories of road-salt to meet the “just in time” delivery requirements of public-safety agencies), the terminal must conduct quarterly “Indicator Monitoring” of certain analytes. The samples must be sent to a qualified laboratory and tested for the following analytes:

- **Total Suspended Solids** (TSS)
- **pH** (pH testing—determination of the acidic value of water—must be conducted on-site with an instrument or lab material and the data recorded)
- **Chemical Oxygen Demand** (COD) Note that COD testing is easily skewed when there is salt in the water sample. Since the terminal is situated in a

saltwater environment and is constantly handling salt, Indicator Samples should also be tested for “**Biological Oxygen Demand**” (BOD). This test is not as susceptible to error due to salt.

Because the activity at the terminal involves marine cargo handling (Sector Q), the General Permit requires indicator, report-only sampling and testing for **Polycyclic Aromatic Hydrocarbons (PAHs)** *two times per year* in the first and fourth year of the General Permit. Sixteen (16) individual PAHs (see Appendix A to 40 CFR Part 423) include: naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, indeno[1,2,3-c,d]pyrene, and dibenz[a,h]anthracene. Note that Sector P and Q facilities that pave, seal, or re-seal paved surfaces with **Coal-Tar Sealant** where industrial activities occur or must do quarterly indicator monitoring for 16 types of polyaromatic hydrocarbons or “PAHs.”

IN ORDER TO ELIMINATE THE SAFETY RISK, DO NOT USE COAL-TAR SEALANT ANYWHERE IN THE TERMINAL TO PAVE, SEAL, OR RE-SEAL PAVED SURFACES.

4.3.3 Quarterly Benchmark Monitoring

The Terminal is a Sector Q facility (water transportation and marine cargo handling). Quarterly benchmark testing is mandatory:

Analyte	Benchmark	Comments
Total Recoverable Aluminum	1,100 ug/L	Equivalent of 1.1 parts per million. Old benchmark was 0.750 ug/L
Total Recoverable Lead	210 ug/L	Equivalent of 0.21 parts per million. No change from previous permit. Saltwater based.
Total Recoverable Zinc	90 ug/L	Equivalent of 0.09 parts per million. No change from previous permit. Saltwater based.

Electronic Submission to EPA: Samples must be carefully collected (clean hands, clean gloves, clean equipment, valid sample kits) and sent under proper conditions (iced in lab kits) and chain-of-custody documentation to the laboratory.

Once results are received from the laboratory, they are submitted to US EPA on **electronic discharge monitoring reports** through EPA’s NetDMR system.

A SAMPLE EXCEEDANCE OVER THE STATED BENCHMARK CAN TRIGGER MANDATORY ADDITIONAL IMPLEMENTATION MEASURES (AIM) UNDER THE NEW 2021 GENERAL PERMIT. THE TERMINAL MUST ADHERE TO AIM REQUIREMENTS.

4.3.3.1 Additional Implementation Measures (AIM)

Pages 46 to 54 of the General Permit have mandatory requirements for “Additional Implementation Measures” (AIMs) if the average quarterly benchmark sample exceeds the benchmark over the course of one year of sampling. Note that if a single quarter’s result is 4 times the benchmark, AIMs need to be pursued immediately. The AIMs process is as follows:

**ADDITIONAL IMPLEMENTATION MEASURES
PHASED OPPORTUNITY TO DEMONSTRATE COMPLIANCE**

- BASELINE STATUS FOR BENCHMARKS**
- A. Every site begins at **Baseline** after receiving Authorization to Discharge.
 - 1. Collect quarterly benchmark samples.
 - 2. If an analyte is 4 times the benchmark, proceed immediately to AIMs.
 - 3. If average of four quarters of results is at or below benchmark, remain in “Baseline” status.
 - 4. If average exceeds benchmark, proceed to AIMS Level 1 for that analyte.

STRIKE ONE: FIRST BENCHMARK EXCEEDANCE

- B. **AIMS LEVEL ONE**: Mandates the following steps:
1. *Immediately* review your SWPPP and your Storm Control Measures
 2. Determine if modifications are necessary:
 - a. Identify source of pollution more precisely
 - b. Determine if spills or leaks contributed to exceedance
 - c. Determine if any impact from non-stormwater discharge
 - d. Conduct a single comprehensive cleanup?
 - e. Change personnel and/or modify personnel conduct
 - f. Obtain and install new storm control measures
 - g. Increase inspections and take actions on observations
 3. Implement additional control measures using good engineering practices
 4. If you decide nothing more needs to be done, document in SWPPP and also document in Annual Report
 5. *Numerous Documentation Requirements*:
 - a. Within 24 hours of learning of the exceedance:
 - Document 5.1.1 conditions; 5.2.3 conditions (AIM 1); 5.2.4 conditions (AIM 2); 5.2.5 conditions (AIM 3).
 - Findings will need to be summarized in Annual Report:
 - Describe condition or triggering event. Many details needed if a spill or leak was involved.
 - State the date the condition or triggering event identified.
 - Describe immediate actions taken to minimize or prevent discharge of pollutions.
 - Signed and certified under penalty of law.
 - b. Documentation within 14 days of learning of the exceedance is also quite detailed. REFER to Section 5.3.3 on Page 54 of the General Permit.

POSSIBLE RETURN TO BASELINE IF FOUR GOOD BENCHMARK QUARTERS

- C. **CONTINUE QUARTERLY BENCHMARKING** while in AIMS Level One Status.
1. If you sample over four quarters and do not exceed benchmark status, the facility's status returns to Baseline.
 2. If you again exceed the benchmark, facility is in AIMS Level Two Status.

STRIKE TWO: ANOTHER EXCEEDANCE WITHIN FOUR QUARTER PERIOD

- D. **AIMS LEVEL TWO:** Mandates the following steps:
1. Immediately review your SWPPP and your Storm Control Measures. You must take actions, using good engineering practices, "beyond what you did in your AIM Level 1 responses:"
 2. Determine if modifications are necessary:
 - a. Identify source of pollution more precisely
 - b. Determine if spills or leaks contributed to exceedance
 - c. Determine if any impact from non-stormwater discharge
 - d. Conduct a single comprehensive cleanup?
 - e. Change personnel and/or modify personnel conduct
 - f. Obtain and install new storm control measures
 - g. Increase inspections and take actions on observations
 3. Implement additional control measures using good engineering practices
 4. If you decide nothing more needs to be done, document in SWPPP and also document in Annual Report
 5. Numerous Documentation Requirements similar to AIM Level 1. See those requirements and also requirements at Section 5.2.4 on pages 48-49 of the General Permit.

STILL POSSIBLE TO RETURN TO BASELINE IF FOUR GOOD BENCHMARK QUARTERS

- E. **CONTINUE QUARTERLY BENCHMARKING** while in AIMS Level Two Status.
1. If you sample over four quarters and do not exceed benchmark status, the facility's status returns to Baseline.
 2. If you again exceed the benchmark, facility is in AIMS Level Three Status.

**STRIKE THREE: ANOTHER EXCEEDANCE WITHIN FOUR-QUARTERS PERIOD
MORE AGGRESSIVE CONTROL MEASURES REQUIRED**

- F. **AIMS LEVEL THREE**: Mandates the following steps:
1. Install Structural Controls:
 - a. Permanent covers
 - b. Berms
 - c. Secondary Containment
 2. Install Treatment Controls:
 - a. Sand filters
 - b. Hydrodynamic separators
 - c. Oil-water separators
 - d. Retention ponds
 - e. Infiltration structures
 3. "The controls or treatment technologies you install should be appropriate for the pollutants that triggered AIM Level 3 and should be more rigorous than the pollution prevention/good housekeeping-type stormwater control measures implemented under AIM Tier 2 in Part 5.2.4 [of the permit]."
 4. Deadlines:
 - a. Schedule installation of measures within 14 days.
 - b. Actual installation within 60 days.
 - c. Outer limit 90 days if facility documents why sooner was infeasible.

**RISK FROM FURTHER EXCEEDANCES:
EPA MAY REQUIRE FACILITY TO APPLY FOR INDIVIDUAL PERMIT**

While in AIM Level 3 Status, the facility must continue its quarterly benchmark sampling and testing. If no exceedances are recorded for the next four quarters of testing, the facility may return to Baseline Status. If, however, more exceedances occur even after the installation and operation of the AIM Level 3 requirements, EPA may require the facility to apply for an individual permit.

Note that an individual permit is likely to impose effluent limitations rather than benchmarks. Such limitations, if exceeded, are a violation of law that exposes the facility to penalties, fines, and other measures.

4.3.4 Numeric Effluent Limitations Monitoring

The facility does not conduct activities that subject it to numeric effluent limitations monitoring.

4.3.5 Annual Impaired Water Monitoring

As mentioned in Section 2.5 of this SWPPP, the United States Environmental Protection Agency (“EPA”) and the New Hampshire DES classify the Lower Piscataqua River as an “Impaired Water.” The “Lower Piscataqua River,” identified by NHDES as assessment unit NHEST600031001-02-02, is an impaired water within the scope of Appendix A. According to the *State of New Hampshire 2018 Section 303(d) Surface Water Quality List*, this segment of the river is Category 5. This means that this segment of the river is classified as being in need of a “Total Maximum Daily Load,” or “TMDL,” but does not yet have one. Listed impairments are:

- Estuarine Bioassessments
- Polychlorinated biphenyls
- Dioxin (including 2,3,7,8-TCDD)

US EPA Region I Guidance does not require monitoring for these pollutants. We have confirmed with Region I that no monitoring is required.

4.3.6 Reporting Results

Results for “Indicator Monitoring” and “Quarterly Benchmarking” must be submitted electronically through EPA’s NetDMR system. The Terminal Manager should coordinate with Greg Coppola and Joe McNamee to make timely filings and – if needed – implement corrective actions or additional implementation measures.

4.4 Spill Prevention and Response Procedures

The Terminal Manager or a trainer from another office will review spill prevention and response procedures in safety reviews and training sessions with terminal employees. The Terminal Manager, supported by Pollution Prevention Team members, will normally conduct the safety/training session, and employees will be required to log their attendance. *See Appendix F* to this SWPPP.

- **Location of Spill Control Material:** Training shall include review of the location of the spill control materials.
- **Deployment of Spill Control Material:** Training shall include review of the deployment of the spill control material. In the discretion of the Terminal Manager, employees shall participate in deployment drills.

Reportable Spills: Employees must report all spills or releases immediately to the Terminal Manager or to the senior staff person on site at the time. The Terminal Manager or the senior staff member will determine if the spill is reportable to government authorities and take appropriate steps to notify the correct agencies. The Terminal Manager or senior staff person will also log the report, supervise the spill response, and coordinate with and assist any responding agency. The Terminal Manager and/or other members of the SWPPP Team will include a check of spill-response equipment in the monthly inspection and order supplies as needed

4.5 Corrective Action Procedures *See pages 44-46 of General Permit.*

If you observe any of the following conditions, YOU MUST TAKE CORRECTIVE ACTION, REVIEW AND REVISE THE SWPPP AS APPROPRIATE, AND DOCUMENT YOUR ACTIONS:

- A spill, leak, or discharge of non-stormwater (*e.g.*, an oil spill)
- Violation of a Sector Q (marine cargo handling) or Sector P (land transportation or cargo storage) requirement
- Inadequate stormwater control measures resulting in contamination reaching the receiving waters.
- A control measure not properly operating or maintained, or not installed or not installed correctly.
- A VISUAL QUARTERLY SAMPLE with color, odor, floating solids settled solids, suspended solids, or foam.

4.5.1 Timing for Corrective Actions: Prompt Action Required!

“Immediately take all reasonable steps to minimize or prevent the discharge of pollutants until you can implement a permanent solution, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.” *See page 45, Section 5.1.3.1 of the General Permit:*

- “The term ‘all reasonable steps’ means you must respond to the conditions triggering the corrective action, such as cleaning up any exposed materials

that may be discharged in a storm event (e.g. through sweeping, vacuuming) or making arrangements (i.e., scheduling) for a new Storm Control Measure to be installed.”

“Subsequent Actions” need to be taken within 14 days if feasible, and no later than 45 days after discovery. Any action extending beyond 45 days requires notification to EPA.

SECTION 5: Annual Report

The General Permit, *See Section 7.4 at page 66 of the General Permit*, requires the facility to submit an **Annual Report** by January 30 each calendar year. The Annual Report must contain:

- **Routine Inspection Summary:** The Pollution Prevention Team (“PPT”) shall summarize the observations and findings of the past year’s routine inspections.
- **Quarterly Visuals:** The PPT shall review and summarize the conditions observed in the quarterly visual inspections of the stormwater discharge.
- **Corrective Actions/Additional Implementation Measures:** The PPT must summarize all corrective actions or AIMs implemented during the prior year. Corrective Actions must be logged into **Appendix J** and AIMs documentation should be included in **Appendix J-1**.

SECTION 6: Eligibility Under Other Federal Laws

6.1 Endangered and Threatened Species & Critical Habitat

GSM is relying upon Criterion B in Appendix E of the MSGP to demonstrate its activities and stormwater discharges will not have a negative effect on any endangered species or critical habitat. GSM made a Criterion B filing in January 2020 and received no comments or objections. Research has not revealed any material changes in endangered or threatened species or in critical habitat in the facility’s action area since the early 2020 research and filing.

As a preliminary matter, in connection with applying for a wetlands permit from the New Hampshire Department of Environmental Services (NH DES), Tighe & Bonds requested consultation with the Fish and Wildlife Service. On July 9, 2019, the USF&W noted that the Northern Long-Eared Bat (*Myotis septentrionalis*) is listed as threatened in New Hampshire. The Service confirmed, however, there are no critical habitats within the Granite State action area.

NHB19-2156



Figure 8: Excerpt from Submittal Prepared by Tighe & Bond Concerning Endangered and Threatened Species and Critical Habitat

Tighe and Bond also consulted with the New Hampshire Natural Heritage Bureau about threatened or endangered species. Atlantic Sturgeon (*Acipenser oxyrinchus*) [threatened federal and state] and Shortnose Sturgeon (*Acipenser brevirostrum*) [endangered federal and state] are periodically present in Portsmouth Harbor and surrounding waters in 2016. The stormwater upgrade for which Tighe & Bond will seek permits will not have any impacts of concern. There are also extensive

materials about species and habitat set forth in the City of Portsmouth's MS4 application, which is available online.

More specifically for Criterion B purposes, the NH State Pier physically abuts the Granite State Facility on its upstream boundary. Fundamentally, both facilities share the same industrial shoreline and the same action area in the Piscataqua River. That action area is the segment of the river immediately downstream of the Sarah Mildred Long Bridge and immediately upstream of the Memorial Bridge. This bending segment of river is approximately 3,700 feet from bridge center point to bridge center point according to Google Earth.

The State Pier has had coverage under the MSGP since approximately 2015, and its cargo operations as described in its SWPPP have included, among other cargoes, the unloading of salt ships, the stockpiling of road salt on an area of the pier, and the distribution of road salt to public agencies from the pier by truck. The State Pier's SWPPP does not reveal any impacts to endangered species or critical habitat from the pier's cargo handling activities (including road salt). Accordingly, the Granite State facility can satisfy ESA requirements through Criterion B.

Recent extensive water quality and endangered species analysis related to a proposed partial replacement of State Pier infrastructure confirms the ongoing validity of the analysis. The only endangered species within USFW jurisdiction is the Northern Long-Eared Bat. The State Pier analysis contained the following information:

According to the USFWS Official Species List, northern long-eared bat (*Myotis septentrionalis*) may occur in this area of the state. The Natural Heritage Bureau did not report any known winter hibernacula or maternity roost trees in the vicinity of the project. NH Fish & Game also has not indicated that known hibernacula or maternity roost trees exist in the vicinity of the project. According to the US Fish & Wildlife Service, suitable summer habitat for northern long-eared bat consists of a variety of forested habitats. This species generally prefers closed canopy forest with an open understory. Potential roost trees include live trees or snags, at least 3 inches in diameter, with exfoliating bark, cracks, crevices, or cavities. Suitable habitat does not exist in or within 1,000 feet of the project area. The project will have no effect on northern long-eared bat (Exhibit I).

See Market Street Marine Terminal Functional Replacement Project, 15731 A000(909), Categorical Exclusion, July 2019, at page 12 (prepared by McFarland Johnson).

With respect to endangered or threatened marine species subject to NOAA jurisdiction, the analysis for the Categorical Exclusion report contained the following conclusions about Atlantic Sturgeon and Shortnose Sturgeon in Portsmouth Harbor:

In summary, there are no spawning sites [for Atlantic Sturgeon or Shortnose Sturgeon] within the action area based on existing habitat conditions and available data and overwintering is very unlikely. Potentially suitable foraging habitat may be present in the action area. Therefore, adult and sub-adult Atlantic and shortnose sturgeon may use the project area for foraging and are most likely to occur between April and November. With the implementation of minimization measures, including a time of year restriction that limits dredging and blasting activities to November 15 to March 15, it was determined that the proposed project is not likely to adversely affect shortnose sturgeon, Atlantic sturgeon, or Atlantic sturgeon critical habitat. Findings were described in detail in a Biological Assessment and NOAA concurred with the findings (Exhibit H). A blasting plan will be prepared prior to construction. No further consultation pursuant to Section 7 of the Endangered Species Act is required.

See Categorical Exclusion Report at 13. Notably, Granite State's operations currently do not involve dredging or blasting, so the restrictions mentioned are irrelevant.

6.2 Historic Properties

The facility satisfies Criterion B with respect to Historic Properties Screening. In 2016, the facility obtained permits from federal, state, and local agencies to implement repairs to the shoreline, specifically the rip-rap bank south of the pier and shipping berth. Permit review included review by the New Hampshire Division of Historical Resources. No historic resources exist at the facility, and no facility operations make a negative impact on historical resources.

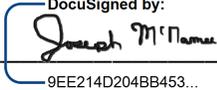
SECTION 7: SWPPP Certification Signature Requirements

See Section 6.2.7 at page 61 of the General Permit and Appendix B-11.

Company Management:

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 whose 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: Joe McNamee Title: Manger

Signature:  Date: 2/2/2026
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Terminal Management:

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 whose 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: Justin Sunderland Title: Foreman

Signature:  Date: 1/27/2026
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End of Document, December 18, 2025. Appendices follow.

Sector-Specific Non-Numeric Effluent Limits