

CAMPBELL ENVIRONMENTAL GROUP

Nike N. -
Inspections

CITY CLERK

2005 OCT - October 14, 2005

City Clerk's Office
389 Congress Street
Portland, ME 04101

Re: Scrap Metal Recycling Facilities Permit - Waste Audit: Louis Mack Co.
City of Portland, Code of Ordinances 31-5

On October 1, 2005, I performed a waste audit on:

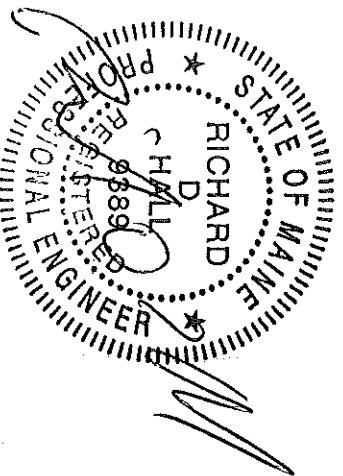
Louis Mack Co., Inc
750 Warren Ave
Portland, ME

In accordance with the City of Portland Scrap Metal Recycling Rules, Rule # 5, and was assisted by Alvin Mack, during the audit. The audit included the State of Maine Hazardous Waste Management Rules and Solid Waste Management Rules.

The facility does not generate any Hazardous Waste. Universal Waste is limited to fluorescent lights. Universal waste is properly managed by storing any burned out bulbs in the original containers, which are picked up by a universal waste recycling company. No waste bulbs had been accumulated at this site at the time of the audit.

All areas, both inside and outside were inspected. Lead acid batteries were observed, as they are collected and stored for shipment. There was no evidence of any leakage or spills in the battery areas. Batteries are shipped to a recycling facility, using commercial carriers. On the exterior of the facility, there was no evidence of accumulation of any waste, either hazardous or non-hazardous. The facility does not accept any vehicles, or vehicle parts except radiators and A/C heat exchangers. Radiators are cleaned prior to delivery to the facility and freon is removed from A/C systems prior to delivery. The only truck used by the facility was not inspected by me, but it was stopped by the Maine State Police, for a vehicle check on September 30, 2005. I reviewed the vehicle inspection and it passed with a 100% score.

Sincerely,



3/6 B7

Richard D. Hall
Maine Professional Engineer

CC: Alvin Mack

173 Gray Road, Falmouth, ME 04103 Telephone 207-253-1990 WWW.CEGroupEnvironmental.com

**Proposed Scrap Metal Recycling Facilities Rules
To be Promulgated by the
Department of Planning and Urban Development
Pursuant to the
Scrap Metal/Recycling Facilities Ordinance**

The following rules are promulgated pursuant to Section 31-9 of the Scrap Metal Facilities Ordinance and all terms, conditions and requirements in that ordinance are hereby incorporated by reference.

Rule #1 Baseline Testing:

- (a) An environmental waste baseline exploration and sampling plan is required which shall include the location of soil sampling and groundwater sampling locations to establish waste baseline environmental conditions at the site.
- (b) A minimum of three on-site surficial soil samples, on the upper six (6) inches and three Geoprobe-installed or conventionally-installed overburden monitoring wells are required for all sites.
- (c) The Department shall determine the number and location of soil samples and monitoring wells after reviewing the waste baseline exploration and sampling plan.
- (d) Initial waste baseline evaluation of the scrap metal recycling facility requires a waste management compliance audit of the facility by a qualified professional and the results of the audit shall be submitted to the City of Portland for evaluation prior to issuance of the license for the facility.

Rule #2 Soil Testing:

- (a) Initial waste baseline testing shall consist of three on-site and two off-site soil samples collected according to a sampling plan developed by a qualified environmental professional and submitted to the Department for review and approval as part of the application.
- (b) The three on-site samples shall be taken from soils in the principle outdoor work areas, i.e., in which metals to be recycled are received, processed and stored. The two off-site samples shall be taken in areas that are downgradient from the principal work areas with respect to surface runoff and/or are adjacent to property boundaries at which metals to be recycled are received, processed or stored. The soil samples shall represent a composite of the upper six-inches of soil at the sampling location.
- (c) The soil samples shall be analyzed for volatile organic compounds (EPA Method 8260), semivolatile organic compounds (EPA Method 8270), PCBs (EPA Method 8082),

the eight RCRA metals (EPA Methods 3010/6010), diesel-range organics (MDEP Method 4.1.25), and gasoline-range organics (MDEP Method 4.2.17).

(d) The criteria for evaluation of soil samples shall be the Maine DEP Remedial Action Guidelines for Soils (RAGS) of May 20, 1997.

(e) The City of Portland reserves the right to request split samples of soil taken as part of the licensing procedure. The split samples taken by the City of Portland shall be analyzed by an independent laboratory in order to provide corroboration of results.

Subsequent to receiving results of waste baseline soil sampling, the City may require additional sampling at the metal recycling facility or off-site and/or a plan for remediation of contaminated soils at on-site or off-site locations.

Rule #3 Groundwater Testing:

(a) Initial waste baseline testing shall consist of three on-site overburden monitoring wells installed by Geoprobe or conventional hollow-stem auger drilling methods. The location and the rationale for the location of the three monitoring wells shall be developed by a qualified environmental professional and submitted to the Department for review and approval as part of the application.

(b) The three monitoring wells shall be located so as to monitor groundwater emanating from the principle outdoor work areas, i.e., areas in which metals to be recycled are received, processed and stored. Ten-foot well screens in the monitoring wells shall be placed so as to intersect the groundwater table. Groundwater samples shall be taken from the three monitoring wells in according with MDEP Low-Flow Groundwater Sampling Guidance, June 1996.

(c) The water samples shall be analyzed for volatile organic compounds (EPA Method 8260), semivolatile organic compounds (EPA Method 8270), PCBs (EPA Method 8082), the eight RCRA metals (EPA Methods 6010/7470), diesel-range organics (MDEP Method 4.1.25), and gasoline-range organics (MDEP Method 4.2.17).

(d) The criteria for evaluation of water samples shall be the Maine DEP Maximum Exposure Guidelines (MEGs) of January 20, 2000 and the Procedural Guidelines for Establishing Action Levels and Remediation Goals for the Remediation of Oil-Contaminated Soil and Groundwater in Maine, March 13, 2000.

(e) The City of Portland reserves the right to request split samples of groundwater taken as part of the licensing procedure. The split samples taken by the City of Portland shall be analyzed by an independent laboratory in order to provide corroboration of results.

3/4/97

Subsequent to receiving results of waste baseline groundwater sampling, the City may require additional sampling at the metal recycling facility or off-site and/or a plan for remediation of contaminated groundwater at on-site or off-site locations.

Rule #4 Dismantling Motor Vehicles and Other Items Containing Waste:

The dismantling of items containing waste shall take place in a building with an impervious floor and appropriate equipment and containers to properly extract and store waste and recover any spilled or escaped waste in compliance with state and federal laws.

Upon receiving a motor vehicle, the battery shall be removed and located in such a way as to ensure the battery's contents will not spill onto the ground.

When any engine lubricant, transmission fluid, brake fluid and/or engine coolant is removed from a vehicle, those fluids shall be drained into watertight containers which shall be kept covered and secured by containment in a storage building designed to contain spills. Any fluids from the motor vehicle shall be stored, recycled or disposed of according to all applicable federal and state laws. No discharge of any fluids from any motor vehicle shall be permitted into or onto the ground.

Rule #5 Storage and Handling of Waste:

Waste shall be stored and handled pursuant to and in compliance with state law and applicable regulations of the Maine Department of Environmental Protection and any amendments thereto.

Hazardous substances and hazardous waste, including PCBs, solvents, and degreasers, and mercury and special wastes, including petroleum-related products shall be received, handled, processed, stored and disposed of in accordance with State of Maine Hazardous Waste Management Rules (06-96 DEP, January 23, 2001) and Solid Waste Management Regulations (Chapter 405, September 1, 1999).

Rule #6 Setback Requirement; Visual Screening and Limitation on the Height of Piles of Metal or Other Material

In no event shall the scrap metal recycling facility be located closer than 100 feet from a public road. The setback provision shall apply to temporary or permanent storage, weighing, or processing areas for any metal or material within the scrap metal recycling facility, but shall not apply to any driveways or administrative buildings, and shall not apply to the fences or screening which may be established to keep the facility screened from ordinary view, except such fences or screening must be outside the public road right-of-way. For the purposes of the Rules, the term "from a public road" shall mean from the far side of any immediately adjacent public road.

Visual impact standards can be met through storage, setback, or screening, or a combination thereof; however, the screening shall in no case exceed 15 feet in height and any piles of metal or other material shall not exceed 20 feet in height.

(a) **Fencing.** Fences shall be so located and of sufficient height to completely screen the metal recycling facility and any piles of material within the facility from ordinary view. The minimum height of any fence is six feet; although the actual height must be sufficient to accomplish the complete screening from ordinary view but in no case may the height of the fence exceed 15 feet. All fences shall be well constructed and maintained. All fences shall be uniform in appearance, erected in a workmanlike manner, and constructed of sound, undamaged material.

(b) **Plantings.** Screening may be accomplished through the planting and/or maintenance of trees, shrubs, or other vegetation of sufficient height, density and depth of planting or growth to completely screen the metal recycling facility from ordinary view throughout the calendar.

(c) **Natural or man-made screening.** Screening may be accomplished by use of the following natural or man-made screens provided the scrap metal recycling facility is completely screened from ordinary view.

(1) **HILLS, gullies, or embankments.** Where man-made, such screens must be constructed to blend with the landscape with loaming and seeding or other treatment as may be necessary to establish a natural appearance; or

(2) Building or other installations; or

(3) A combination of the above.

If buildings or other installations are used, they are not subject to the 15 foot height limitation on fences or other types of screening.

Rule #7 Exemption from Specific Requirements:

The following requirements shall not apply to facilities existing on or before the effective date of this Ordinance.

(a) Rule 6, 100' setback requirement.

MEMORANDUM

TO: Rick Knowland, City of Portland Planner

FROM: Dan Goyette, PE – Development Review Coordinator, Woodard & Curran, Inc.

DATE: December 23, 2005

RE: Louis Mack Co., Inc., 750 Warren Avenue

Woodard & Curran has reviewed the Storm Water Pollution Prevention Plan (SWPPP) for Louis Mack Co., Inc. The SWPPP was reviewed for compliance with the City of Portland Scrap Metal Recycling Facilities Ordinance and Rules.

Documents Reviewed

- Storm Water Pollution Prevention Plan, dated November 30, 2005, prepared by Campbell Environmental Group.

I. Stormwater Management

- A.** The applicant has not supplied any of the base line testing required, nor any of the annual testing results required under the rules.
- B.** The applicant should install trash racks or screens on all culverts. Also, the applicant should install a floatables trap within any catch basins on the property. To ensure that the minimum amount of material leaves the site, the applicant should install a trash rack or other mechanism within the drainage swale to trap any material that has been washed off the pavement.

DRG
203848.

cc: File

Mark Cenci Geologic, Inc.

104 Front Street - Portland, Maine 04103 - Cell: 207 329 3524
Home: 207 772 8702 - Fax: 207 772 8702 • Info@markcenci.com
www.markcenci.com

CERTIFIED GEOLOGIST/LICENSED CIVIL EVALUATOR



September 30, 2005

To: City Clerk's Office
389 Congress Street
Portland, Maine 04101

Re: Scrap Metal Recycling Facilities Permit Application

Eric Mack Co Inc
704 Warren Avenue
Portland, ME 04103

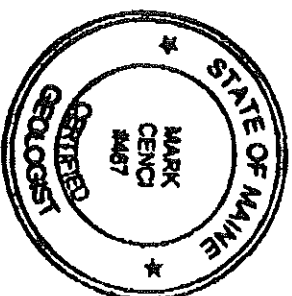
Purpose: The purpose of this information is to satisfy the permit application.

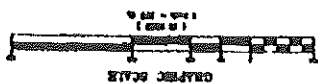
- 1) The maximum storage height of any piles of metal is 6 feet.
- 2) A map of the location of any areas on the site used for processing, preparing or storage of material is attached.
- 3) The facility is not located over a sand and gravel aquifer, nor is there one in the vicinity, as determined by Mark Cenci Geologic, Inc.
- 4) There are no residences, schools, public parks, public playgrounds, public bathing beaches, churches, or cemeteries within 500 feet of the area where metal and/or materials will be stored and processed.
- 5) The 100 year flood plain is along the Presumpscot River, approximately one-half mile from the property.
- 6) There is no sand and gravel aquifer adjacent to the property, as determined by Mark Cenci Geologic, Inc.
- 7) A wetland body on adjacent CMP land is depicted on the attached plan.
- 8) A site plan was submitted to the City in 1980.
- 9) Results from soil sampling done on September 30, 2005, by Northeast Labs is pending

- 10) Results from groundwater sampling done on September 30, 2005, by Northeast Labs, is pending.
- 11) The facility is screened by topography, landscaping and the building itself.
- 12) The types of metals processed on the site are: copper, brass, aluminum, stainless steel, iron, lead and zinc
- 13) See the waste audit by Campbell Environmental Group, pending.
- 14) See report by Campbell Environmental Group, pending.
- 15) See the report of the Campbell Environmental Group, pending.
- 16) See the report of the Campbell Environmental Group, pending.

Mark Cenci

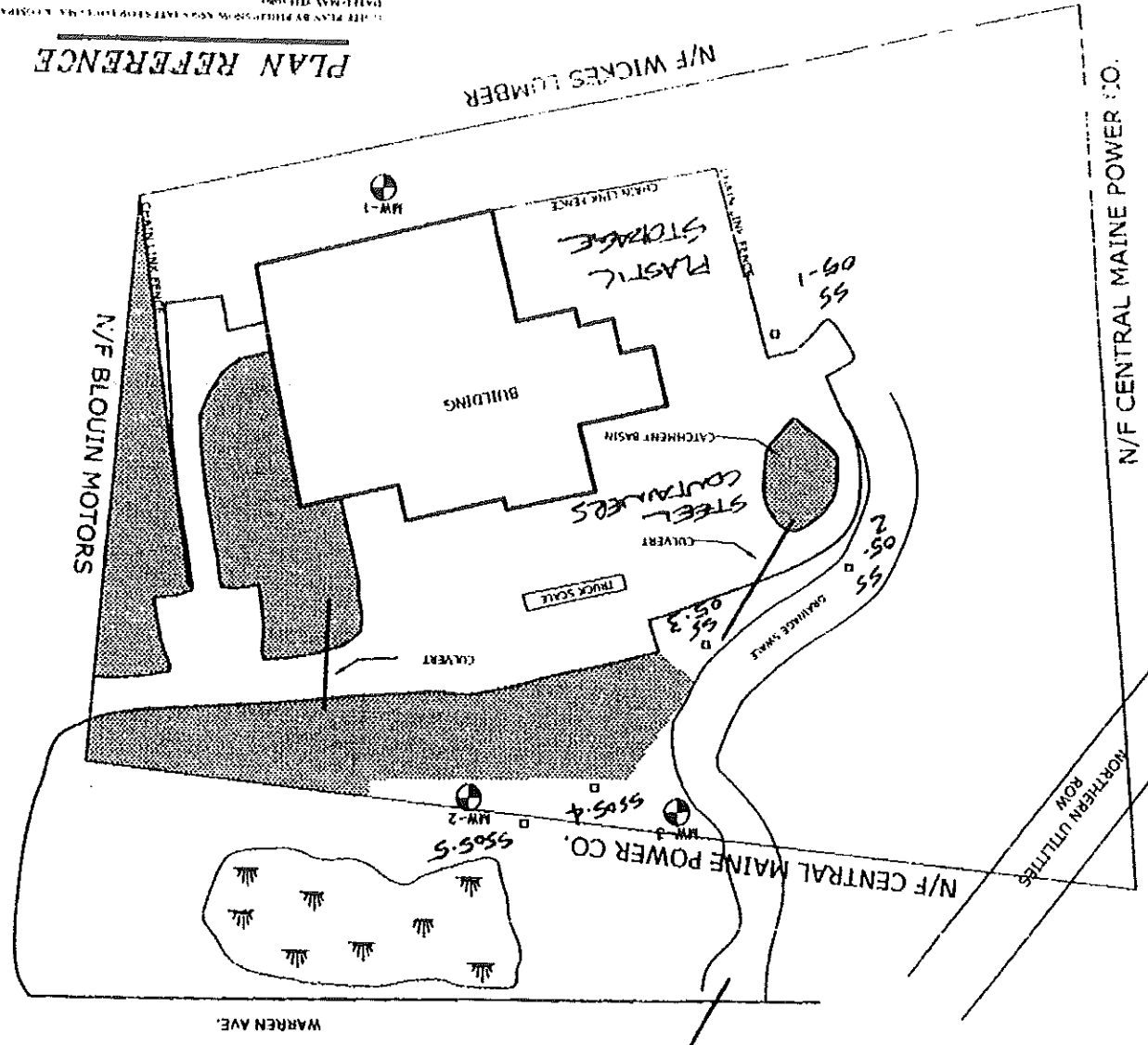
Mark Cenci
Maine Geologist #467





1. SITE PLAN BY PHOTOS AND AERIAL PHOTOGRAPHY
 2. PHOTOGRAPHY WITH SOIL SAMPLES AND ANALYSES
 3. FIELD DATA SHEET
 4. ALL PLANS BY PHOTOS AND AERIAL PHOTOGRAPHY

PLAN REFERENCE



LEGEND

- MONITORING WELL
- ROW OR EASEMENT
- WETLAND DEPOSITION
- SOIL SAMPLE
- GRASS AREA

| | |
|----------|------------|
| DATE | 11/11/03 |
| BY | MARK CONTO |
| APP'D | |
| CHECKED | |
| REVISION | |
| NO. 1 | |
| NO. 2 | |
| NO. 3 | |
| NO. 4 | |
| NO. 5 | |
| NO. 6 | |
| NO. 7 | |
| NO. 8 | |
| NO. 9 | |
| NO. 10 | |
| NO. 11 | |
| NO. 12 | |
| NO. 13 | |
| NO. 14 | |
| NO. 15 | |
| NO. 16 | |
| NO. 17 | |
| NO. 18 | |
| NO. 19 | |
| NO. 20 | |

ENVIRONMENTAL TESTING SITE PLAN
 750 WARREN AVE. PORTLAND, ME 04103
LOUIS HACK CO., INC.

Mark Conto Consulting Inc.
 100 Portland Street, Portland, ME 04103
 Tel: 603.733.1111 Fax: 603.733.1112
 www.markcontoc.com



Planning: _____
PPD _____
Zone _____
Taxes _____
File _____

City Clerk's Office
389 Congress Street
Portland, Maine 04101
(207)-874-8557

New/Renewal License fee \$500.00 plus costs
After the Fact fee \$1500.00
Application fee \$30.00 new \$25.00 renewal
Total Due _____

SCRAP METAL RECYCLING FACILITIES PERMIT APPLICATION
CHAPTER 31, PORTLAND CITY CODE §31-1 et. seq.

Please check one: (Corporation/ LLC/ Non-profit org.) (Sole Proprietor) (Partnership)

Property Owner's Name: LOUIS WACK CO, INC Phone: 773-0273

Property Owner's Address: 750 WARREN AVE Zip: 04103
*If the property is owned by more than one entity, please supplement above information on an additional sheet of paper.

Business Name: LOUIS WACK CO. INC Phone: 773-0273

Location Address: 750 WARREN AVE Zip 04103

Mailing Address: SAME Zip _____

Contact Person: ALVIN WACK Phone: SAME

Manager of Business: SAME Home Phone # _____

Does the issuance of this license benefit any City employee? Yes No
If yes, please list name(s) of employee(s) and City Department(s):

Have applicant, partners, associates, or corporate officers ever been wrestled, indicted, convicted or court martialled for any violation of law? NO If yes, please explain: _____

Have any of the applicants, including the corporation if applicable, ever held a business license with the City of Portland
Yes No. If yes, please list business name(s) and location(s): _____

Is any principal officer under the age of 18? Yes No
Please list items or general type of items for sale, if any: _____

SOLE PROPRIETOR / PARTNERSHIP INFORMATION: (if corporation, leave blank)

| | | | | | |
|------------------|-------|---------------|-------|--------------------|-------|
| Name of Owner(s) | _____ | Date of Birth | _____ | Residence Zip Code | _____ |
| Name of Owner(s) | _____ | Date of Birth | _____ | Residence Zip Code | _____ |
| Name of Owner(s) | _____ | Date of Birth | _____ | Residence Zip Code | _____ |

CORPORATE / LLC / NON-PROFIT ORGANIZATION APPLICANTS: (if sole proprietor, leave blank)

Corporation Name: LOUIS WACK CO. INC.

Corporation Mailing Address: 750 WARREN AVE ZIP 04103

Contact Person: ALVIN WACK Phone Number: 772-0273

PRINCIPAL OFFICERS: (if more space is needed, please attach a separate page)

| | | | | | |
|------|------------------------|-------|------------------|---------------|---------------------------------|
| Name | <u>LEVIN WALK</u> | Title | <u>VICE-PRES</u> | Date of Birth | Residence Zip Code |
| Name | <u>S. RICHARD WALK</u> | Title | <u>PRES</u> | Date of Birth | Residence Zip Code <u>04103</u> |
| Name | _____ | Title | _____ | Date of Birth | Residence Zip Code |
| Name | _____ | Title | _____ | Date of Birth | Residence Zip Code |
| Name | _____ | Title | _____ | Date of Birth | Residence Zip Code |

Please provide the following information and check all items for which information has been submitted. **20 COPIES MUST BE SUBMITTED WITH THIS APPLICATION FOR DISTRIBUTION TO CITY DEPARTMENTS.**

_____ ~~SEE ATTACHED~~ MEMO FOR MARK CENIC / GEOLGIC The maximum storage height of any piles of metal or other material.

_____ A map of the location of any areas on the site used for processing, preparing or storage of materials.

_____ A map of the location of any sand and/or gravel aquifer and/or any sand and gravel aquifer recharge area as described on the Maine Geological Survey significant aquifer map for the Portland West Quadrangle (GSM Map No. 99-11) or as mapped by a State of Maine certified geologist or other competent professional.

_____ A map of the location of any residences, schools, public parks, public playgrounds, public bathing beaches, churches, or cemeteries within 500 feet of the area where metal and/or materials will be stored or processed.

_____ A map of the boundaries of the 100-year floodplain.

_____ A map of any sand or gravel aquifer on or adjacent to the site as mapped by the Maine Geological Survey or by a licensed geologist.

_____ A map of any waterbody, watercourse or wetland on or within 300 feet of the site.

_____ A site plan that complies with chapter 14, section 525(b) as files for approval by the Portland Planning Department/Board.

_____ ****Please note date of site plan submission at Planning Office, 4th floor, City Hall: _____, 200_____**

_____ Results and data from on-site and off-site soil sampling and testing, which testing complies with the Rules attached hereto.

_____ Results and data from on-site and off-site groundwater sampling and testing, which testing complies with the Rules attached hereto.

_____ A depiction of any and all screening of the site.

_____ Other information.

_____ 1. The types of metal processed on the site.

_____ 2. The types of waste handled and the average volume per year per material.

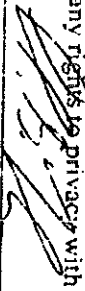
3. A description of the protocol for handling waste and the destination to which that waste is sent.
4. An operations manual as described in chapter 402 of the Maine Department of Environmental Protection regulations.
5. Operational records as described in chapter 302 of the Maine Department of Environmental Protection regulations.
6. An annual report as described in chapter 402 of the Maine Department of Environmental Protection regulations.

Renewal Application

----- If this is a renewal application, please provide evidence of annual testing completed according to the Rules attached to this application

Applicant, by signature below, agrees to abide by all laws, orders, ordinances, rules and regulations governing the above license and further agrees that any misstatement of material fact may result in refusal of license or revocation if one has been granted. Applicant agrees that all taxes and accounts pertaining to the premises, or otherwise owed to the City by the Applicant, will be paid prior to issuance of the license.

It is understood that this and any application(s) shall become public record and the applicant(s) hereby waive(s) any rights to privacy with respect thereto. I/We, hereby waive any rights to privacy with respect thereto.

Signature  Title VP Date 9/30/05



**Storm Water Pollution Prevention Plan
(SWPPP)**

Prepared for:

Louis Mack Co., Inc
750 Warren Ave
Portland, Maine 04103

November 30, 2005

Prepared by:

Campbell Environmental Group
173 Gray Road, Falmouth, ME 04103
(207) 253-1990

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APPENDICES

Appendix A - Completed Notice of Intent

Appendix B - Figures

Appendix C - Spill Leak Forms

Appendix D - Annual Training Record

Appendix E - Comprehensive Site Compliance Evaluation

1.0 CERTIFICATION

Louis Mack Co., Inc. Storm Water Pollution Prevention Plan (SWPPP)

I hereby certify that I am familiar with the facilities and information contained in this plan and, to the best of my knowledge and belief, such information is true, complete and accurate. Further, this plan has been prepared in accordance with good engineering practices.

Alvin Mack, Manager

Date

Revisions:

| Date | Initials | Revision |
|-------|----------|----------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

2.0 INTRODUCTION

This Storm Water Pollution Prevention Plan (SWPPP) describes existing operations and conditions related to storm water management at the Louis Mack Co., Inc facility, located at 750 Warren Avenue in Portland Maine (Louis Mack). In addition, the SWPPP includes a list of Best Management Practices (BMPs) to be employed at this facility. The SWPPP has been prepared in accordance with the requirements of the State of Maine Department of Environmental Protection *Multi-Sector General Permit: Maine Pollutant Discharge Associated with Industrial Activity* (General Permit).

This SWPPP is an information and implementation document designed to ensure that the requirements of the General Permit are addressed. The SWPPP is also a working document to be modified whenever necessary to achieve the goals in the General Permit.

On November 11, 2005, Campbell Environmental Group, Inc. (CEG) on behalf of Louis Mack submitted a Notice of Intent to the Maine Department of Environmental Protection (MEDEP) to comply with the MEDEP General Permit. A copy of the NOI is included in **Appendix A.**

2.1 Site Description

The Louis Mack facility is located at 750 Warren Avenue in Portland, Maine and is currently utilized as a plastic and metal recycling facility. The site is approximately 5.75 acres in size and has sloping areas around the main building. The facility is located in an urban industrial district, shown on **Figure 1, Appendix B.**

2.2 Applicability of Storm Water Regulations

The MEDEP General Permit establishes a comprehensive framework for addressing industrial storm water discharges to the waters of the State of Maine other than groundwater. These permit conditions set forth the requirements for storm water discharges from an industrial facility to many types of water bodies including all navigable waterways and streams. Because Louis Mack has an applicable standard industrial classification (SIC) code of 5093 for Scrap and Waste Material, it is required to file a NOI and follow the permit requirements.

2.3 Storm Water Pollution Prevention Plan (SWPPP) Implementation

2.3.1 Required Elements of the SWPPP

This SWPPP has been prepared in accordance to the required elements listed in the General Permit. Additional SWPPP requirements specific to SIC 5093 are listed in Table 1 of the General Permit.

2.3.2 Keeping Plans Current

This SWPPP must be updated within 60 days following:

- a change in design or operation at the Louis Mack facility, which has a significant effect on the potential for storm water pollution;
- when a Comprehensive Site Compliance Evaluation (refer to **Section 10.1**) determines that changes to the SWPPP are required for the plan to meet the stated objectives (Written changes must be made within two weeks of inspection and implemented within twelve weeks of the inspection); and or
- a release of a reportable quantity of material has occurred.

2.3.3 Notification

The following circumstances require written and/or verbal notification to MEDEP:

- Oil and or chemical spills to the ground or water must be reported to the MEDEP at 1-800-482-0777 for oil spills and 1800-452-4664 for hazardous material spills;
- A Notice of Intent to indicate that the facility intends to cover storm water discharges under the Multi-Sector General Permit;
- If there is a release in excess of a reportable quantity, as listed in 40 CFR 117 and 40 CFR 302, the leader of the storm water pollution prevention team shall notify (1) the National Response Center (NRC 800-424-8802), and (2) U.S. EPA Region 1 Water Management Division Storm Water Staff Office in writing within 14 days of the incident. The notification shall include the date, circumstances, quantity, and type of release; and
- When the facility operation changes or storm water discharges cease, a Notice of Termination (NOT) to discontinue coverage under the General Permit may be submitted to the MEDEP.

3.0 POLLUTION PREVENTION TEAM

A Storm Water Pollution Prevention Team must be established for compliance with the requirements of the General Permit. The team member duties are summarized below in Section 3.1. The Pollution Prevention Team will be responsible for the management, implementation, maintenance, and revisions of the SWPPP. The Pollution Prevention Team will meet at least annually and will:

- implement storm water pollution prevention training;
- implement quarterly storm water pollution prevention inspections;
- ensure preventive maintenance actions are completed; and
- conduct an annual Comprehensive Site Compliance Evaluation

The Storm Water Pollution Prevention Team shall be established simultaneously with the implementation of the SWPPP. Membership of the pollution prevention team shall be updated as necessary to reflect personnel changes.

3.1 Pollution Prevention Team Members

| Name | Job Title | Responsibility | Date Assigned | Team |
|------------|-------------|----------------|---------------|------|
| Alvin Mack | Manager | | | |
| | Yard Man I | | | |
| | Yard Man II | | | |
| | | | | |

Refer to Section 6.0 for employee training requirements.

4.0 EXISTING ENVIRONMENTAL MANAGEMENT PLANS

Louis Mack has an application for a Scrap Metal Recycling Facilities Permit with the City of Portland. During a recent waste audit, as required as part of the City of Portland application, no hazardous wastes or operations that generate hazardous wastes were found on the property. Based on the use of this facility, no other environmental management plans, beyond this SWPPP, are required.

5.0 POTENTIAL POLLUTAN SOURCES AND PATHWAYS

Storm water drainage from the Louis Mack facility is to a marshy area and drainage area respectively located on the north and northwest side of the facility. Drainage from this site ultimately discharges to the Presumpscot River.

5.1 Site Plan

A site plan of the Louis Mack facility is included as **Figure 2** in **Appendix B** and indicates the major drainage areas, corresponding outfalls, and existing structural storm water controls. The site plan for the facility shows building footprints, structures, paved areas, drainage patterns of each storm water outfall, existing structural storm water pollution control measures (catch basins), and locations of exposed significant sources of materials. This map has been drawn only to show the approximate or relative locations of surface features and conditions present at the site. Consequently, the site map does not represent survey accuracy, scale or exact location of any property boundaries or structures.

5.2 Potential for Pollution

The Louis Mack facility is a plastic and metal recycling facility that primarily handles vinyl products. A smaller part of the operation includes ferrous and non-ferrous metal recovery, which includes the storage and shipment of lead acid batteries.

During the site inspection completed by CEG, the plastics were stored and processed primarily indoors. Some plastic was stored outside. Since some of the plastics are located in the yard, the potential for pollution is from small pieces of plastic, which can be washed into the drains.

The metals stored on site appeared to be clean and free of oils or solvents. The clean metal chips and metal containers were stored outdoors. The lead acid batteries were stored indoors on an impervious surface.

5.3 Inventory of Exposed Material

Two storage areas that potentially have material that discharge into storm water include:

- Plastic storage areas; and
- Metal container storage area

5.4 Listing of Significant Past Spills or Leaks

The Louis Mack facility has not had any significant spills in the last five years.

5.5 Existing National Pollution Discharge Elimination System Discharge Permits

The Louis Mack facility has no existing National Pollution Discharge Elimination System Permits (NPDES).

5.6 Storm Water Sampling Data

There is no existing storm water sampling data for the Louis Mack facility. However, according to the City of Portland scrap yard permit application, soil and groundwater sampling is required. Prior sampling was conducted in 1997 by the MEDEP and in 2005 by another consultant. The analytical data was similar. In 1997, the MEDEP did not consider the concentrations to be significant.

5.7 Summary of Potential Pollutant Sources

In addition to the potential storm water pollution from exposed materials, storm water may be impacted as a result of on-site activities such as maintenance, cleaning, loading or unloading, outdoor storage activities, manufacturing or processing activities, on-site waste disposal practices, or miscellaneous dust or particulate generating processes.

At Louis Mack all equipment maintenance and cleaning is done inside. The only source of potential storm water contamination other than the exposed materials is through the loading and unloading of trucks.

5.8 Measures and Controls

5.8.1 Best Management Practices

Best Management Practices (BMPs) are required to be used to both prevent pollution from contacting storm water (source control BMP) and to divert polluted storm water to "treatment" before release to the storm water drain system (treatment BMPs). The General Permit requires

dischargers to implement the eight basic source control BMPs:

- good housekeeping
- preventative maintenance and visual inspections
- inspections
- record keeping and reporting
- spill prevention and response
- sediment and erosion control
- management of runoff

Dischargers are required to consider possible BMPs to reduce pollutants in storm water runoff. The BMPs in this section shall be implemented as part of the SWPPP. In addition, Louis Mack falls under an SIC code requiring additional controls as defined in Sector N of the permit. These controls have been included with the BMPs to be implemented at Louis Mack.

A description of the BMPs (including those under Sector N) identified for the Louis Mack Co. Inc facility are included below in **Table 1**. The BMPs are described in more detail in the **Section 5.8.2**. Detailed actions required to implement and schedule each of these general BMPs are listed in **Table 2**.

| BMP | | BMP Description / Maintenance | |
|---|--|--|--|
| Good Housekeeping | | Housekeeping projects are identified and accomplished as part of plant maintenance. | |
| Preventive Maintenance and Visual Inspections | | Routine maintenance of trucks. | |
| Inspections | | Weekly visual inspections of site, paying particular attention to the outfalls to determine if plastic particles are moving with storm water. | |
| Record Keeping and Reporting | | Report spills and discharges of pollutants and record on spill form in Appendix C. | |
| Spill Prevention Response | | Call State Police or Local Fire Department | |
| Sediment and Erosion Control | | Plant grass seed on disturbed areas to maintain ground cover. | |
| Management of Runoff | | Run off from the site will drain through existing structures. Outfalls will flow through a vegetated buffer prior to flowing into the drainage swale for the site. | |
| Additional BMPs Required by the Site Code 509 - Section 6.6 Sanitary Storm | | | |
| N 1 Inbound Recyclable and Waste Metal Control Program | | Minimize the chance of receiving materials which could be significant sources of pollutants. | |
| N 2 Scrap and Metal Waste Stockpiles / Storage (outdoors) | | Minimize contact of storm water runoff with stockpiled materials | |
| N 3 Stockpiling of Turnings Exposed to Cutting Fluids (Outdoors) | | Minimize contact of surface runoff with residual cutting fluids | |
| N 4 Scrap and Waste Metal Stockpiles / Storage (Covered or Indoors) | | Minimize contact of residual liquids and particulate matter from materials stored indoors or under cover | |
| N 5 Scrap and Recyclable Waste Processing Areas | | Minimize surface water runoff from coming in contact with scrap processing equipment | |
| N 6 Scrap Lead-Acid Battery Program | | Properly handle, store, and dispose of scrap lead-acid batteries | |
| N 7 Spill Prevention and Response Procedures | | Minimize storm water contamination at loading / unloading areas and from equipment and container failures. | |
| N 8 Quarterly Inspection Program | | Inspect all designated areas of the facility quarterly | |
| N 9 Supplier Notification Program | | Notify suppliers which scrap materials will not be accepted | |

5.8.2 Summary of Best Management Practices

Good Housekeeping

Good housekeeping procedures are designed to remove significant source material from contact with storm water via regular site cleaning, and regular maintenance. General good housekeeping practices that will be implemented at the Louis Mack facility include the following:

- Collect and dispose of all existing waste, debris and trash present on the site;
- Maintain clean surfaces by broom cleaning, sweeping, shoveling, etc.;
- Regularly pick up and dispose/recycle waste materials;
- Routinely inspect leaks or conditions that could lead to the discharge of toxic or hazardous chemicals to the storm water system;
- Report spills to the appropriate individual;
- Familiarize personnel to locations of storm drains and catch basins around the facility;
- Incorporate information sessions on good housekeeping practices in the employees training program; and
- Discuss good housekeeping practices at employee meetings.

Preventative Maintenance and Visual Inspections

Preventative maintenance is the regular inspection and maintenance of equipment and devices to avoid a failure that could lead to storm water pollution. Specific inspection practices to be implemented at the Louis Mack facility include the following:

- Conduct weekly visual inspections of the facility and ground for any unusual conditions, malfunction, spills, trash or other debris, or any other extraneous factors;
- Conduct regular inspections of trucks and for signs of leaks, breakdown, malfunction, or deterioration;
- Repair or replace any faulty equipment in a timely manner;
- Keep maintenance records on any repaired or replaced equipment;
- Conduct detailed BMP inspections to evaluate the BMP implementation and effectiveness according to a defined inspections schedule of this plan;
- General maintenance activities related to storm water pollution prevention shall be recorded in this SWPPP;

Inspection Program

Weekly and quarterly inspections will be performed at the Louis Mack facility. Quarterly inspections are to be documented, as required by the MEDEP. The Comprehensive Site Compliance Evaluation Checklist in Section 10.1 shall be used to complete the quarterly inspections.

Routine inspections will be conducted at Louis Mack Co. Inc on a weekly basis. The following areas to be inspected include:

- Material storage areas;
- Indoor battery storage, and metal chip storage areas;
- All paved areas; and
- Facility drainage systems.

The weekly inspections will cover the effectiveness of good housekeeping procedures and material storage and handling practices. If problems are identified during these inspections, they will be promptly addressed.

Visual inspections are required quarterly. Visual inspections will be conducted only in the daylight hours. Examination will include observations of color, odor, turbidity, floating solids, foam, oil sheen, and other obvious indications of storm water pollution. Any problem with the visual quality of the storm water will be identified on the inspection record and the probable source of contamination will also be noted. Inspections will be performed at each storm water outfall. Whenever practical, the same individuals should examine storm water discharge samples throughout the term of the permit to ensure consistency.

Record Keeping and Reporting

All reportable spills and discharges of pollutants will be recorded. If an incident occurs, information such as locations, amount spilled, amount recovered, and potential exposure to storm water will be recorded. A spill form is included in Appendix C.

Spill Prevention and Response

Because the facility does not have hazardous waste or oil storage above the regulatory threshold, it is not required to have a spill prevention and response procedure.

Sediment and Erosion Control

Soil erosion and sediment transport by storm water can cause significant problems for surface waters. The General Permit requires that all areas with a potential for soil erosion be identified, and measures of control be described. If necessary, grass or other vegetation will be planted on the ground to maintain ground cover or an earthen berm, exposed by construction and other activities. Currently grass seed is planted on disturbed areas on a routine basis.

To reduce erosion, every effort will be made to minimize land disturbances and preserve existing vegetation. If land disturbance is unavoidable and soil erosion is expected, devices such as straw bales, sod, straw and seed, or silt fencing will be used to minimize transport of eroded soil.

Management of Runoff

The storm water runoff from the site drains through a vegetated buffer prior to flowing into the drainage swale for the site. The buffer is inspected weekly to determine if plastic is being transported with the storm water. Run off from the site drains through existing catch basins to a wet area located on the north side of the site (see **Figure 1, Appendix B**).

N 1 Inbound Recyclable and Waste Metal Control Program

To minimize the chance of receiving materials, which could be significant sources of pollutants, the facility accepts materials from only a limited group of approved suppliers. When materials arrive, they are inspected. Materials which are contaminated are rejected and not received.

N 2 Scrap and Metal Waste Stockpiles / Storage (outdoors)

Some plastic is stockpiled outdoors. To minimize contact of storm water runoff with stockpiled materials the stored plastic is clean and free of contamination.

N 3 Stockpiling of Turnings Exposed to Cutting Fluids (Outdoors)

To minimize the contact of surface runoff with residual cutting fluids, all chips are stored indoors. Also, chips are not accepted with significant levels of oils or grease.

N 4 Scrap and Waste Metal Stockpiles / Storage (Covered of Indoors)

To minimize surface water runoff from coming in contact with scrap processing equipment, all metals stored outside are clean and free of contamination.

N 5 Scrap and Recyclable Waste Processing Areas

Surface water runoff coming in contact with scrap processing equipment, is not applicable because all the processing equipment is housed and operated indoors.

N 6 Scrap Lead-Acid Battery Program

The facility properly handles, stores, and disposes of scrap lead-acid batteries. All storage is on a contained area. Cracked or leaking batteries are not accepted. In the event that cracked or leaking batteries are detected, they are shipped to a battery recycler.

N 7 Spill Prevention and Response Procedures

Spill response equipment is easily accessible near the loading docks and personnel are familiar with equipment locations and uses. However, there is no need to minimize storm water

contamination at loading/ unloading areas and from equipment and container failures, because only clean materials are being handled in these areas.

N 8 Quarterly Inspection Program

Detailed inspections will be conducted at Louis Mack on a quarterly basis. The following areas will be inspected:

- Material storage areas;
- Indoor battery storage, and metal chip storage areas;
- All paved areas; and
- Facility drainage systems.

These inspections will cover the effectiveness of good housekeeping procedures and material storage and handling practices. If problems are identified during these inspections, they will be promptly addressed. The Comprehensive Site Compliance Evaluation Checklist in Section 10.1 shall be used to complete the quarterly inspections.

N 9 Supplier Notification Program

Through regular communication with consistent suppliers, it is clear what type of scrap materials will not be accepted

| <small>Implementation Date: 12/15/04 01/25/05 01/25/05</small> | | | |
|--|--|---------------------------|--------------------|
| EMP | Description of Action | Start/End Completion Date | Person Responsible |
| Good Housekeeping | Conduct training | Ongoing | Al Mack |
| Preventive Maintenance | Daily inspections prior to use and written reports of maintenance performed. | Ongoing | Al Mack |
| Inspections | Weekly inspections. | 1/1/06 | Al Mack |
| Spill Prevention Response | Spill absorbents at the shipping dock | 1/1/06 | Al Mack |
| Sediment in Erosion Control | Plant grass as needed. | Ongoing | Al Mack |
| Management of Runoff | Keep paved areas clear of any potential pollutants. | Ongoing | Al Mack |
| N 1 Inbound Recyclable and Waste Metal Control Program | Inspect deliveries | Ongoing | Al Mack |
| N 2 Scrap and Metal Waste Stockpiles/ Storage (outdoors) | Clean plastic only | Ongoing | Al Mack |
| N 3 Stockpiling of Turnings Exposed to Cutting Fluids (Outdoors) | Store indoors only | Ongoing | Al Mack |
| N 4 Scrap and Waste Metal Stockpiles/ Storage (Covered or Indoors) | Accept Clean metals only | Ongoing | Al Mack |
| N 5 Scrap and Recyclable Waste Processing Areas | Processing indoors only | Ongoing | Al Mack |

| SMP | Description of Action | Scheduled Completion Date | Responsible Organization |
|--|--|---------------------------|--------------------------|
| N 6 Scrap Lead-Acid Battery Program | Separate scrap lead batteries, use proper handling storage and disposal, minimize exposure to precipitation and runoff, and complete employee training | Ongoing | AI Mack |
| N 7 Spill Prevention and Response Procedures | Spill cleanup materials | Ongoing | AI Mack |
| N 8 Quarterly Inspection Program | Inspections | Ongoing | AI Mack |
| N 9 Supplier Notification Program | Not Needed | Ongoing | AI Mack |

6.0 PERSONNEL TRAINING

According to the General Permit, personnel working in industrial areas shall be trained with respect to the components and goals of the SWPPP. Training will be held once per year. Keeping personnel current on proper facility operations reduces the possibility that equipment and materials will be mishandled or misused. This will reduce the potential for exposure of significant materials to storm water runoff. Annual training records should be archived in Appendix D.

To implement a program of employee training so that all employees are familiar with provisions of this SWPPP, the BMPs to be utilized, and their roles and responsibilities will require the following:

- A coordination meeting with all members of Pollution Prevention Team to discuss all aspects of the SWPPP and the BMP implementation;
- A minimum of one training session each year with facility employees and members of the Pollution Prevention Team to familiarize each employee with all provisions of this SWPPP and the BMP implementation and their roles and responsibilities. The training session will include a discussion of any revisions to the SWPPP; and
- Train all employees in spill prevention response procedures, good housekeeping, and materials management practices.

Specific training topics, description of training and training schedule are summarized in Table 3.

| Training Topic | Brief Description of Training Program/Material (e.g. In-house or external course) | Frequency of Training (list dates) |
|---------------------------------------|--|------------------------------------|
| Spill Prevention and Response | Discuss SWPPP and identify locations for potential spills, review release procedures | Annually in May |
| Good Housekeeping | Weekly inspections | Annually in May |
| Material Management Practices | Discuss handling practices | Annually in May |
| Other BMPs | Review and discuss requirements | Annually in May |
| Storm Water Pollution Prevention Plan | Review SWPPP and discuss requirements | Annually in May |

| | | |
|---|--|-----------------|
| N 1 Inbound Recyclable and Waste Metal Control Program | Review details | Annually in May |
| N 2 Scrap and Metal Waste Stockpiles / Storage (outdoors) | Review requirements | Annually in May |
| N 3 Stockpiling of Turnings Exposed to Cutting Fluids (Outdoors) | Reinforce that this is not allowed | Annually in May |
| N 4 Scrap and Waste Metal Stockpiles / Storage (Covered or Indoors) | Review requirements in Appendix N 4. b. 4 of General Permit to store indoors | Annually in May |
| N 5 Scrap and Recyclable Waste Processing Areas | Review requirements in Appendix N 4. b. 5 of General Permit to keep area picked up and swept regularly | Annually in May |
| N 6 Scrap Lead-Acid Battery Program | Review requirements in Appendix N 4. b. 6 of General Permit to manage all batteries on impervious surface, indoors | Annually in May |
| N 7 Spill Prevention and Response Procedures | Review requirements in Appendix N 4. b. 7 of General Permit and review location of clean up sites. | Annually in May |
| N 8 Quarterly Inspection Program | Review requirements in Appendix N 4. b. 8 of General Permit | Annually in May |
| N 9 Supplier Notification Program | Review requirements in Appendix N 4. b. 9 of General Permit | Annually in May |

7.0 NON STORM WATER DISCHARGES

In addition to storm water, the following non-storm water discharges, as shown in Table 4, are authorized in the general permit provided the appropriate pollution prevention measures are identified in the SWPPP and implemented at the facility:

| Sources of Non-Storm Water Discharge | Pollution Prevention Measures |
|--------------------------------------|--|
| Fire hydrant flushing | Not applicable |
| Water line flushing | Direct flow away from areas where pollutants exist. Direct flow away from erosion prone areas. |
| Irrigation drainage | Not applicable |
| Lawn Watering | Not applicable |
| External buildings wash-down | Direct flow away from areas where pollutants exist. Direct flow away from erosion prone areas. |
| Pavement wash-downs | Direct flow away from areas where pollutants exist. Direct flow away from erosion prone areas. |
| Air conditioning condensate | Ensure condensate does not contact lubricant residues around air-conditioning machinery. |
| Springs | Not applicable |
| Uncontaminated groundwater | Not applicable |
| Foundation or footing drains | Not applicable |

8.0 MONITORING AND REPORTING REQUIREMENTS

8.1 Quarterly Monitoring Requirements and Periods

Quarterly sampling is not required for this site as discussed in Part V of the General Permit.

8.2 Annual Monitoring Requirements / Sample Collection

Annual compliance sampling is not required as discussed in Part V of the General Permit.

8.3 Reporting

Reporting for this site is not required as discussed in Part V of the General Permit.

9.0 SWPPP EVALUATION

9.1 Inspection Schedule

An inspection of the BMPs to be implemented via this SWPPP will be made as part of the regular weekly plant inspection conducted by the appropriately designated personnel. Weekly visual inspections of the site conditions will be made. During these inspections evaluations will be made to determine if any BMP malfunctions are obvious.

At the end of 12 months from the date of this SWPPP and annually thereafter, a thorough examination of all BMPs and their effectiveness will be performed prior to updating the SWPPP, as necessary. In general, the site compliance evaluation shall include the following elements:

- An overall inspection of the two storm water drainage areas for evidence of pollutants entering the drainage system;
- An evaluation the effectiveness of measures to reduce pollutant loading and whether additional measures are needed;
- Inspection of any equipment needed to implement the SWPPP, such as spill response equipment; and
- If compliance evaluation identifies deficiencies in the SWPPP, revise the plan as needed within sixty days of inspection.

Upon completion of the inspection, the Comprehensive Site Compliance Evaluation Checklist in Table 5 should be completed summarizing inspection, observations relating to the SWPPP, and actions taken. All incidents of non-compliance shall be documented in the evaluation report. Where there are no incidences of non-compliance, the inspector shall sign the Comprehensive Site Compliance Evaluation Checklist to certify that the facility is in compliance with the plan. This report will be retained in Appendix E of this SWPPP.

Figure 5
Compliance Site - Compliance Evaluation of PCBs
Consulted on the Portland, Maine

| Date of Evaluation | No Action Required | Action Required | Not Apples-able |
|--|--------------------|-----------------|-----------------|
| Inspectors: | | | |
| 1 Verification Site Mapping | | | |
| Identification location of outfalls | | | |
| Watershed boundaries | | | |
| Direction runoff flows | | | |
| Required Actions: | | | |
| 2 Accuracy of Significant Material Inventory | | | |
| Required Actions: | | | |
| 3 Accuracy of Significant Spills or Leaks Record | | | |
| Required Actions: | | | |
| 4 Accuracy of Identification of Risk Pollutants | | | |
| Equipment maintenance and cleaning areas | | | |
| Loading/unloading areas | | | |
| Required Actions: | | | |
| 5 Effectiveness of Storm Water Management Controls | | | |
| Pollution Prevention Team | | | |
| Good Housekeeping | | | |
| Preventative maintenance | | | |
| Spill Prevention and Response | | | |
| Sediment and erosion areas-visual inspection | | | |
| Employee training and training records | | | |
| Van-storm discharges-visual inspections | | | |
| Inspections and inspection records | | | |