Stormwater Pollution Prevention Plan Wills Wharf Office Project

Baltimore Works Site Baltimore, Maryland

25 April 2016

Revised 21 September 2016

By: Harbor Point Development LLC Environmental Resources Management, Inc.

For: U.S. Environmental Protection Agency – Region III Maryland Department of the Environment

TABLE OF CONTENTS

1.0	INTRODUCTION			
	1.1	REGULATORY BACKGROUND	1	
	1.2	PURPOSE OF SWPPP	2	
	1.3	CONSISTENCY WITH OTHER PLANS	2	
	1.4	PLAN ORGANIZATION	3	
2.0	PRO))JECT DESCRIPTION		
3.0	IDENTIFICATION OF POTENTIAL POLLUTION SOURCES			
	3.1	CONTACT WATER AND NON-CONTACT WATER	6	
	3.3	OTHER POTENTIAL POLLUTION SOURCES	6	
4.0	8.0 BEST MANAGEMENT PRACTICES FOR STORMWATER MANAGEM CONTROLS			
	4.1	EXISTING BMPS	8	
	4.2	DURING CONSTRUCTION	8	
5.0	STORMWATER POLLUTION PREVENTION TEAM AND TRAIN		15	
	5.1	PROJECT SPECIFIC TEAM MEMBERS AND RESPONSIBILITIES	15	
	5.2	TRAINING REQUIREMENTS	15	
LIST	OF FIC	GURES		
	1	SITE LOCATION		

LIST OF APPENDICES

A SWPPP INSPECTION FORM

1.0 INTRODUCTION

Harbor Point Development LLC (HPD or Developer) and its consultants have prepared this Stormwater Pollution Prevention Plan (SWPPP) for the Wills Wharf Office Project (Project). The Project is planned for a portion of the former AlliedSignal Baltimore Works Site (Site), located in Baltimore, Maryland. Figure 1 shows the Site location.

This SWPPP has been prepared as part of the Detailed Development Plan (DDP) for Project, and is to be used in conjunction with the Material Handling and Management Plan (MHMP), Spill Prevention and Response Plan (SPRP), and the Construction Air Monitoring Plan (CAMP). This SWPPP presents best management practices for managing stormwater runoff during construction activities identified in the DDP. This SWPPP pertains specifically to the Project, and terminates post-construction following completion of the activities identified in the DDP.

1.1 REGULATORY BACKGROUND

This SWPPP has been prepared in accordance with the United States Environmental Protection Agency (EPA) and Maryland Department of the Environment (MDE) regulations governing stormwater runoff. The federal requirements regarding stormwater runoff are codified under the National Pollutant Discharge Elimination System (NPDES) regulations, found in Title 40, Part 122, Subpart B of the Code of Federal Regulations (40 CFR 122.26).

EPA has delegated NPDES authority in Maryland to MDE. Maryland regulations governing the stormwater program are codified in the Code of Maryland Regulations in Title 26, Subtitle 08 and Subtitle 17 (COMAR 26.08 and COMAR 26.17). A General Discharge Permit for Stormwater Associated with Construction Activities (General Discharge Permit) will be obtained for the Project. The management activities to be in compliance with the General Discharge Permit are provided in the Project's Erosion and Sediment Control Plan.

This SWPPP was developed in accordance with the requirements of *EPA's NPDES Multi-Sector General Permits for Stormwater Discharges Associated with Industrial Activities* as published in the Federal Register on October 30, 2000. A copy of this SWPPP will be maintained on Site.

As noted below in Section 3, the Developer will also submit an application (Notice of Intent or "NOI") to MDE for coverage under Maryland's

General Permit 11HT: General Permit for Discharges from Tanks, Pipes and Other Liquid Containment Structures at Facilities Other than Oil Terminals (NPDES Permit No. MDG675222 referred to herein as General Permit No. 11HT). All requirements of General Permit No. 11HT for monitoring and discharge limits will be followed during the Project. General Permit 11HT must be obtained before starting construction.

1.2 PURPOSE OF SWPPP

The purposes of the SWPPP are to:

- 1. Evaluate potential pollution sources at the Project that could come in contact with stormwater; and
- 2. Select and implement appropriate measures to mitigate or control the discharge of pollutants in stormwater runoff.

The pollution prevention approach focuses on three objectives:

- 1. Identify sources of pollution that could potentially affect the quality of stormwater discharges associated with the Project;
- 2. Describe and outline implementation of practices to minimize and control pollutants in stormwater discharges associated with the Project; and
- 3. Provide a mechanism for compliance with the terms and conditions of the General Discharge Permit.

This SWPPP describes activities, materials and physical features of the Project that may contribute pollutants to stormwater runoff and the procedures and methods that are used to minimize these impacts. This document is to be revised accordingly if conditions and practices at the Project change.

1.3 CONSISTENCY WITH OTHER PLANS

This SWPPP serves as the site document relevant to stormwater pollution prevention. Special Condition Part IV-C.3 of the General Discharge Permit states that the SWPPP may incorporate parts of other plans or permits that are relevant to stormwater pollution prevention. This SWPPP is the document relevant to stormwater pollution prevention for the Project, and does not incorporate parts of any other plans or permits. However, other plans that have been prepared to support the Project and its DDP are as follows:

- 1. The MHMP has been prepared to address the handling and management of solids (asphalt, stone aggregates, concrete and wood debris and soil) and liquids (storm water, decontamination water and groundwater) that may be encountered during the intrusive activities ("intrusive activities" are defined in the MHMP and reiterated below in Section 3 for the reader's convenience) associated with the Project. The MHMP also includes Best Management Practices (BMPs) for dust control measures to minimize dust emissions;
- 2. The SPRP has been prepared that describes the measures to be implemented by HPD and its Contractors to prevent hazardous material and petroleum product discharges (i.e., spills) from occurring, and to mitigate the effects of a discharge, should one occur;
- 3. The CAMP has been prepared that identifies certain air monitoring activities and BMPs related to dust management to protect the health and safety of workers and the public during construction.

1.4 PLAN ORGANIZATION

The remainder of the SWPPP is organized in the manner listed below.

- *Section 2.0 Project Description.* Section 2.0 presents a narrative of the Project location and current stormwater runoff control.
- *Section 3.0 Identification of Potential Pollution Sources.* Section 3.0 describes in more detail potential stormwater pollution sources for the Project.
- Section 4.0 Best Management Practices for Stormwater Management Controls. Section 4.0 describes those practices to be implemented to ensure proper stormwater management control.
- Section 5.0 Stormwater Pollution Prevention Team and Training. Section 5.0 identifies the pollution prevention team and training to implement the SWPPP.

The Site is located on a peninsula on the northeast shore of the Patapsco River of the Inner Harbor in the Fells Point section of Baltimore City. Historical operations at the Site resulted in impacts to soil and groundwater from hexavalent chromium (CrVI). Honeywell is responsible for operating and maintaining an Environmental Remediation System (ERS) that addresses the chromium impacted soil and groundwater at the Site.

The Site consists of three Areas:

- 1. Area 1 is the principal location of the former AlliedSignal (now Honeywell) Baltimore Works Site, which included chromium processing production and support buildings on an area that covered approximately 14 acres;
- 2. Areas 2 and 3 were used for various industrial and warehousing operations, including chromate ore storage (Area 2) and brass foundry casting, oil blending and storage, coating/plastics production, lumber storage and foundry (Area 3). Areas 2 and 3 currently include the Thames Street Wharf (TSW) Office Building and its associated parking lots, where construction was completed in 2010. The Project will not disturb Area 3 or the TSW Office Building.

The majority of the Project will occur in the western region of Area 2, south of Point Street (formerly Block Street). The construction of Wills Street as part of the Project will involve a limited area along the southeastern portion of Area 1. The Project does not contemplate construction in Area 3. The Project will also include other non-designated areas that are outside of Area 1 or Area 2 but within the Project's Limits of Disturbance (LOD) as defined in the DDP.

3.0 IDENTIFICATION OF POTENTIAL POLLUTION SOURCES

To minimize the quantity of water to be actively managed and treated off Site, storm water will be diverted from excavation zones by installing the required erosion and sediment controls. This diverted storm water will be managed through the Project's Erosion and Sediment Control Plan and will not be collected or require management other than as normal, uncontaminated storm water.

3.1 CONTACT WATER AND NON-CONTACT WATER

As defined in the MHMP, there are two categories of water, "Contact Water" and "Non-Contact Water", which are anticipated to be managed during intrusive work, as summarized below:

- 1. Contact Water Contact Water consists of the following:
 - a. Stormwater collected in temporary storage areas such as the sealed container area/decontamination pad;
 - b. Stormwater in excavations that comes into contact with controlled soil/debris material or groundwater;
 - c. Decontamination water used to decontaminate equipment that contacted controlled soil/debris;
 - d. Groundwater from dewatering, including stormwater that collects in excavations where groundwater is also present, or monitoring well abandonment.
- 2. Non-Contact Water Non-Contact Water consists of the following:
 - a. Stormwater that is collected in excavations constructed as part of a non-intrusive activity;
 - b. Stormwater that has not come into contact with controlled soil/debris or groundwater that ponds on a constructed surface (e.g., mudmat, geotextile supported aggregate) along the bottom and slopes of an excavation constructed as part of an intrusive activity.

3.3 OTHER POTENTIAL POLLUTION SOURCES

There is also the potential for fuel leaks during construction activities, such as during fuel deliveries, refueling of equipment, and on-site fuel

storage. As described in the SPRP, two types of fuel storage tanks are anticipated during construction activities at the Site: 1) generators; 2) and small above ground storage tanks (ASTs) for storage of equipment fuel. A fuel truck is also anticipated to enter and exit the Project for equipment refueling.

All petroleum product ASTs used at the Project will be double walled and constructed in accordance with typical industry specifications and will contain approximately 250 to 500 gallons of fuel. Alternatively, the storage tanks may be placed in secondary containment, using for example a "Collapse-A-Tainer". The storage containers used will be compatible with the characteristics of the petroleum product they contain, and with temperature and pressure conditions.

Emergency generators with a day tank will also likely be used for the Project with a capacity of approximately 250 gallons. Piping connected with a storage tank will be placed aboveground for easy access and visual monitoring during use. The piping will either be double walled or placed in secondary containment. The total volume of petroleum stored during the Project, including the generator day tank and small AST, is anticipated to be between 500 and 750 gallons.

Fuel trucks will enter the Project during construction activities to re-fuel equipment and fuel oil storage tanks. (i.e., cranes, excavators, day tanks, etc.). Fueling of equipment will be performed using the portable, containment system. The Developer's Field Representative or designee will direct the Contractor to ensure that the driver understands the Project layout, knows the protocol for entering the property and delivering the fuel, and is familiar with this SPRP. The Developer's Field Representative or designee will also check to make sure that the driver has the necessary equipment to respond in the event that a discharge from the vehicle or fuel delivery hose occurs.

The trucks and/or Contractor will be equipped with a functioning spill kit that meets industry standards exercised by experienced professionals performing the same services under similar circumstances. Those engaged with re-fueling activities will be knowledgeable with the deployment and use of the spill kit.

BEST MANAGEMENT PRACTICES FOR STORMWATER MANAGEMENT CONTROLS

BMPs for stormwater management control are described in this section. The BMPs were developed using EPA's publication *Stormwater Management for Industrial Activities* (October 1992) as a guidance.

Baseline BMPs are employed across the entire Project and are not necessarily associated with any specific source of significant materials. The BMPs described below are consistent with the conditions of the General Discharge Permit to ensure proper management of stormwater runoff.

4.1 EXISTING BMPS

4.0

The existing BMPs include the asphalt cover in Area 1, Area 2 and the non-designated areas (i.e., areas that lie outside of Area 1 and 2 but within the LOD), the stormwater retention pond on and adjacently northwest of Area 3 (the Project will not disturb Area 3), and the riprap waterside perimeter embankment. This perimeter embankment helps to mitigate the potential erosion of the slope into the harbor.

Area 1 currently has a drainage system in place. A MMC with linear lowdensity polyethylene (LLPDE) liner with a composite drainage net covers Area 1 and is sloped to drain water to a perimeter drain. The perimeter drain is perforated polyvinyl chloride (PVC) pipe on the landward perimeter and HDPE drain tubing at the waterfront perimeter. The tubing was placed in a stone-filled trench at the perimeter of the geomembrane outboard of the hydraulic barrier. The perimeter drain was placed around the entire perimeter. The perimeter drain allows stormwater infiltration within the cap drainage layer (i.e., above the synthetic layers of the cap) to drain to the harbor.

4.2 DURING CONSTRUCTION

This SWPPP addresses best management practices for managing stormwater runoff during construction activities. Stormwater will be diverted from excavation zones by installing the required erosion and sediment controls as shown in drawings in the DDP.

4.2.1 *Contact Water*

Contact Water testing and disposal requirements are provided in the MHMP. Contact Water and Non-Contact Water will not be commingled.

Contact Water shall be managed as hazardous waste unless otherwise determined through waste characterization and profiling as required by the receiving disposal facility. As described in the MHMP, two 21,000 gallon frac tanks will be on site for use by the Project to store Contact Water. Contact Water tanks will be labeled appropriately upon placing the water into the tanks and will be managed in accordance with Code of Maryland Regulations (COMAR) 26.13.03, inclusive of provisions for container labeling, secondary containment, inspection and record keeping.

Contact Water will be transported off-site for disposal following written approval of acceptance from the receiving facility's representative. Transfer operations from the frac tanks to vacuum trucks for off-site disposal will occur within an area of secondary containment.

Contact Water will be collected and conveyed through double-walled pipes, or alternatively pipes located in secondary containment, from the pump location to the designated frac tank. Double-walled conveyance pipes will drain back to the excavation for recovery. When off-site disposal is scheduled, the frac tanks will be emptied using a vacuum tanker truck (or other suitable equipment), which will then transport the liquid to the disposal facility. In the event that a vacuum truck is not available, a centrifugal transfer pump may be used to pump water to a transfer tractor-trailer.

Contact Water will be held for analytical testing for waste profiling, as required by the receiving facility, to ensure proper off-site disposal. Contact water that is profiled as hazardous waste will be disposed at the Honeywell approved EQ York, Pennsylvania facility, unless otherwise approved by Honeywell or directed by the facility. In accordance with COMAR 23.13.03.05E, hazardous waste shall be shipped off-site within 90 days of generating the wastes to an approved, permitted facility. Specific provisions (e.g. container labeling, secondary containment, inspection and record keeping) will be followed.

Contact Water generated from Area 1 has previously been profiled as characteristically hazardous waste, specifically D007 – Chromium per EPA 40 CFR 261, Subpart C and Code of Maryland Regulations Title 26, Subtitle 13. However, it is uncertain if the Contact Water from the remainder of the Project limits would be profiled as either hazardous waste or non-hazardous waste. The Contractor has the option of commingling the Contact Water from within the Project LOD or segregating the Contact Water so as to keep separate hazardous and potentially non-hazardous waste.

When off-site disposal is scheduled, the frac tanks will be emptied using a vacuum tanker truck (or other suitable equipment), which will then transport the liquid to the disposal facility. In the event that a vacuum truck is not available, a centrifugal transfer pump may be used to pump water to a transfer tractor-trailer.

Visual inspections will be routinely performed of all joints, elbows, and similar fittings to detect leaks. Drip pans or other means to prevent the escape of liquids during connection and disconnection of hoses at joints, elbows or similar fittings must be employed.

4.2.2 Non-Contact Water

Water collected and managed as Non-Contact Water will be pumped to a designated 21,000 gallon double-walled frac tank. Sump pumps will be operated as needed to convey the collected water.

Non-Contact Water will be held for analytical testing to determine proper disposal and compliance under General Permit No. 11HT, once the permit is issued. This Non-Contact Water may be discharged to the Baltimore City storm sewer system if the laboratory analytical results comply with the discharge limits as presented in the permit. Otherwise, Non-Contact Water will be properly disposed off Site at the Honeywell approved EQ York, Pennsylvania facility, unless otherwise approved by Honeywell.

4.2.3 Stormwater Management System

The frac tanks for both Contact Water and Non-Contact Water will be situated in the sealed container area/decontamination pad shown in the DDP drawings. However, this area may be relocated during construction, due to the tight spatial constraints on the Project.

To determine the necessary storage capacities for Contact Water management, both the 25-year storm event and the 100-year storm event were examined. However, the storage requirements were determined based primarily on the 25-year storm event. When a storm event occurs, the entire footprint of the excavation, including the sloped portions, is considered to receive stormwater. The pump(s) required to dewater the excavation zone(s) will be adequately sized to manage stormwater during the peak intensity rainfall rate of a 25-year storm event. The calculations used to determine the storage capacities for Contact Water and Non-Contact Water are presented below.

Contact Water Storage Calculations

To determine the necessary storage capacities for Contact Water management, both the 25-year storm event and the 100-year storm event were examined. However, the storage requirements were determined based primarily on the 25-year storm event. When a storm event occurs, the entire footprint of the excavation, including the sloped portions, is considered to receive stormwater. The pump(s) required to dewater the excavation zone(s) will be adequately sized to manage stormwater during the peak intensity rainfall rate of a 25-year storm event.

The maximum area open to stormwater, potentially generating Contact Water, is the sheet pile reinforcement excavation planned for the HB as part of this Project. The assumed area open to stormwater is approximately 15 feet by 250 feet (3,750 square feet). The 24-hour rainfall during a 25- year storm event is 6.23 inches, yielding a total volume of 14,600 gallons for this Area 1 excavation. The 24-hour rainfall during a 100-year storm event is 8.60 inches, yielding a total volume of 20,100 gallons.

Based on the calculations above, one frac tank rated at 21,000 gallons will handle the volume generated by more than one 25-year storm event or one 100-year storm events for this Area 1 excavation. In order to provide sufficient storage, two 21,000 gallon capacity frac tanks will be designated for storage of Contact Water.

The frac tanks for Contact Water will be situated in sealed container area/decontamination pad shown in the DDP drawings; however, this area may be relocated during construction, due to the tight spatial constraints on the Project.

Non-Contact Water Storage Calculations

To determine the necessary storage capacities for Non-Contact Water management, the maximum area open to stormwater and potentially generating Non-Contact Water is assumed to be approximately 1,400 square feet of open pile cap excavations. The 24-hour rainfall during a 25-year storm event is 6.23 inches, yielding a total volume of 5,500 gallons. The 24-hour rainfall during a 100-year storm event is 8.60 inches, yielding a total volume of 7,500 gallons.

Based on the preceding calculations, one frac tank rated at 21,000 gallons will handle the volume generated by more than three 25-year storm events or two 100-year storm events for this non-Area 1 excavation. In order to provide sufficient storage, one 21,000 gallon capacity frank tank will be designated for storage of Non-Contact Water

The frac tank for Non-Contact Water will be situated in the sealed container area/decontamination pad shown in the DDP drawings; however, this area may be relocated during construction due to the tight spatial constraints on the Project.

4.2.4 Snow and Ice

Snow or ice that collects or is formed consistent with the above parameters for Contact Water and Non-Contact Water will be handled in the manner provided above for the respective Contact or Non-Contact Water situation. Snow and/or ice will be removed from the area and temporarily stored in lined, sealed containers. Melted snow and/or ice will be transferred from the lined containers to the Contact Water or Non-Contact Water frac tanks for testing to determine the appropriate disposal action.

4.2.5 Sediment and Erosion Control

The area of disturbance is approximately 2.44 acres. Erosion and sediment controls and stormwater management features will be installed in accordance with the permit drawings to be prepared and submitted to the City of Baltimore under separate cover, and in accordance with the General Permit to Discharge Stormwater Associated with Construction Activities, to be submitted to MDE Water Management Division under separate cover.

Erosion and sediment control will be addressed with conventional best management practices, which include silt fence/super silt fence, perimeter berms/swales, stabilized construction entrances, and inlet protection as detailed in the DDP for the Project. Erosion and sediment controls as detailed on the DDP will be applied to individual excavations made for pipe piles, clean utility corridors, and pile cap and slab installation, including stormwater diversion berms to reduce or limit run-on into open excavations.

4.2.6 Spill Prevention and Response Procedures

The SPRP, prepared as a separate document for the DDP, outlines spill prevention and control measures and should be reviewed for more detail. The following measures will be implemented upon discovery of a release:

- Control and contain the release, to the extent possible;
- Clean up the impacted area as soon as possible;
- Assess the risk;
- Implement the construction SPRP based on the source of the release;
- Report the release to management and government agencies as specified in the SPRP; and
- Follow up with preventive measures and any necessary documentation.

The Contractor will commit manpower, equipment, and materials to prevent a spill, if any, from reaching waterways, shorelines, or sewers.

4.2.7 Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment. Good housekeeping practices to be used during construction activities are the following:

- Maintain clean vehicle access roads;
- Keep all paved and vegetated areas clean of litter and debris and properly maintained;
- Maintain regular refuse pick-up and disposal;
- Spill response equipment is properly located, in adequate supply and working order, and the location(s) are known to all employees, as specified in the SPRP;
- Promptly clean up spills and leaks and properly dispose recovered material;

- Keep walkways and passageways easily accessible and free of protruding objects, materials, and equipment;
- Make sure all trucks which entered any disturbed area, have gone through decontamination procedures for tires, prior to leaving the site; and
- Discuss and promote good housekeeping practices with employees.

4.2.8 Visual Inspections

Stormwater inspections will be conducted at this facility as required. At a minimum, authorized personnel will perform a monthly inspection of the Project. The trained inspector will perform the inspections consistent with the requirements of the General Discharge Permit and MHMP. A copy of the General Discharge Permit will be provided to MDE. The inspection form is provided in Appendix A of this document.

The inspections will be performed to detect evidence of potential common problems that may occur during construction. At the completion of each inspection, the inspector will review the SWPPP to determine if any observation may require revisions to the SWPPP. Any suggested revisions to the SWPPP will be brought to the attention of the Developer to determine if revisions are necessary. No changes to the SWPPP may be implemented without prior MDE approval.

In addition to the monthly inspections, the proposed outfalls will be inspected quarterly and after major storm events. The inspections will be performed to detect evidence of potential stormwater blockage or pollution.

As described previously, Emergency generators with a day tank will also likely be used for the Project with a capacity of approximately 250 gallons. Piping connected with a storage tank will be placed aboveground for easy access and visual monitoring during use. The piping will either be double walled or placed in secondary containment. The total volume of petroleum stored during the Project, including the generator day tank and small AST, is anticipated to be between 500 and 750 gallons.

5.0 STORMWATER POLLUTION PREVENTION TEAM AND TRAINING

5.1 PROJECT SPECIFIC TEAM MEMBERS AND RESPONSIBILITIES

The members of the Stormwater Pollution Prevention Team are listed below:

- Project Coordinator:
 - o Jonathan Flesher: 443-463-3937
- Honeywell Resident Site Manager (CH2MHILL):
 - o Matt Gillis: 443-800-4518

Mr. Jonathan Flesher will designate an inspector (i.e., the Developer's Field Representative or designee) responsible for monthly inspections and documentation that appropriate BMPs required by the SWPPP are in place during for Project. As the Project Coordinator, Mr. Flesher has the overall responsibility for ensuring plan adherence, updated training, and authorizing the resources necessary to implement the SWPPP, including inspections and corrective measures.

Honeywell's on-site consultant, CH2M Hill, represented by the Resident Site Manager or designee, will monitor compliance with procedures for inspections and preventative maintenance for the Project. During construction, the Developer's Field Representative or designee will perform the necessary inspections. Additional team members will provide support on an as-needed basis.

5.2 TRAINING REQUIREMENTS

Members of the pollution prevention team are responsible for conducting employee training programs. The employee training programs are designed to inform personnel at all levels of responsibility of the components and goals of the SWPPP. Training sessions, including initial orientation training, will address topics such as spill prevention and response, preventive maintenance, good housekeeping, storage practices, visual inspections, and recordkeeping and reporting.

At a minimum, training sessions shall be conducted annually during the duration of the construction activities to be performed as part of the DDP.

Topics discussed in the training session and employees who attend the training sessions are to be documented and retained in the Project file. Informal training as practicable in the form of one-on-one communications with personnel on the importance of pollution prevention should occur during visual inspections by members (or designees) of the pollution prevention team. This will allow members of the pollution prevention team to point out potential pollutants to employees and to verify that the information addressed in the training sessions has been communicated effectively to them.

Training will occur as part of the Project kick-off meeting (and annually thereafter for work related to the DDP) with representatives of the Contractor and primary subcontractors whose work either may influence stormwater or include a potential pollution source. Participants in this kick-off meeting would include representatives responsible for maintenance personnel, equipment and vehicle operators, and handling or overseeing the transfer of fuel or other granular or liquid materials into and out of the Project.

Following the initial kick-off meeting, training will be incorporated into safety meetings that will include discussions on these four core subjects:

- *Good Housekeeping* Employees are required to maintain a clean and orderly work environment. The routine sweeping of floors and the prompt cleanup of spilled material is discussed. The location of shovels, brooms, absorbents, and any other spill response equipment are identified. Employees are informed to regularly check for leaks, and spills. Housekeeping issues are addressed during regular safety meetings.
- *Spill Prevention and Response* Employees are made aware of potential spill areas, drainage routes, and to whom a spill should be reported. Specific material handling procedures to avoid spills and response procedures in the event of a spill are also discussed.
- *Loading and Unloading Procedures* Employees are instructed to provide constant supervision during all outdoor fuel transfer and material handling operations and to ensure that all containers are properly sealed prior to handling.
- *Preventive Maintenance* Employees are instructed to provide constant care when using equipment to ensure that the equipment is maintained properly.

No other types of materials other than petroleum products or general housekeeping products are anticipated to be maintained or used on the Project. **FIGURES**



APPENDIX A SWPPP INSPECTION FORM

STORMWATER INSPECTION FORM

Project No.	0323743	Date:	
Project Name:	Wills Wharf Office	Day:	
Location:	Baltimore, MD	Weather:	

ERM Staff

Title/Role

Type of Work in Progress

Stormwater Inspection Summary

Subject	Status	Corrective Action Needed and Notes
Overall condition of perimeter stormwater controls	Acceptable	
	Unacceptable	
Is there evidence of discharge of significant amounts of	🗆 Yes	
sediments to surface waters or systems leading to	□ No	
surface waters?		
Stormwater inlet conditions	Acceptable	
	Unacceptable	
Evidence of Earth slides or mud flows?	🗆 Yes	
Evidence of Concentrated flows of stormwater (rills,	🗆 Yes	
rivulets, channels) that cause unfiltered erosion?	□ No	
Evidence of turbid flows of stormwater that are not	🗆 Yes	
filtered, settled, or otherwise treated to reduce	□ No	
turbiditv?		
Evidence of on-site sediment deposits in areas that	🗆 Yes	
drain to unprotected stormwater inlets or catch basins?	□ No	
Evidence of sediment deposits in the public or private	□ Yes	
streets outside the permitted construction activity	□ No	
Evidence of sediment deposits on adjacent properties	🗆 Yes	
outside the permitted construction activity	🗆 No	
Condition of stockpile areas (e.g., soil, gravel, stone,	Acceptable	
etc.) relative to stormwater discharge	Unacceptable	
Condition of liquid storage areas (e.g., frac tanks, totes,	Acceptable	
etc.) relative to stormwater discharge	Unacceptable	
Condition of vehicle and equipment storage, fueling,	🗆 Yes	
maintenance areas	□ No	
Evidence of trash and debris that could enter	🗆 Yes	
stormwater flow	□ No	
Other:	Yes/Acceptable	
	No/Unacceptable	

ADDITIONAL NOTES

Completed by Name:

Reviewed By:

Signature/Initials:

Signature/Initials: