

Stormwater Pollution Prevention Plan

for:

Spectro Coating Corp.
101-107 Scott Drive
Leominster MA 01453
978-534-1800

SWPPP Contact(s):

Raj Shah
101 Scott Drive
Leominster MA 01453
978-534-1800

SWPPP Preparation Date:

04/ 20 / 2021

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SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information.

Facility Information

Facility Name: Spectro Coating Corp

Street/Location: 101-107 Scott Drive

City: Leominster State: MA ZIP Code: 01453

County or Similar Government Subdivision: Worcester County

NPDES ID (i.e., permit tracking number): MAR053750 (if covered under a previous permit)

Primary Industrial Activity SIC code, and Sector and Subsector (2021 MSGP, Appendix D and Part 8):
2299

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (2021 MSGP, Appendix D):

Is your facility presently inactive and unstaffed and are there no industrial materials or activities exposed to stormwater? ☐ Yes ☒ No

Latitude/Longitude

Latitude:
42.530160 ° N (decimal degrees)

Longitude:
-71.737470 ° W (decimal degrees)

Method for determining latitude/longitude (check one):

☐ Maps (If USGS topographic map used, specify scale: _____) ☒ GPS

☐ Other (please specify): _____

Horizontal Reference Datum (check one):

☐ NAD 27 ☐ NAD 83 ☐ WGS 84

Is the facility located in Indian country? ☐ Yes ☒ No

If yes, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if applicable). _____

Are you considered a "federal operator" of the facility?

Federal Operator – an entity that meets the definition of "operator" in [the 2021 MSGP] and is either any department, agency or instrumentality of the executive, legislative, and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality. ☐ Yes ☒ No

Estimated area of industrial activity at your facility exposed to stormwater: 3.5 acres _____
(to the nearest quarter acre)

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)?

☐ Yes ☒ No

If yes, name of MS4 operator: _____

Name(s) of surface water(s) that receive stormwater from your facility: North Nashua River

Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2021 MSGP, Appendix A)? ☒ Yes ☐ No

If Yes, identify name of the impaired water(s) (and segment(s), if applicable): North Nashua River

Identify the pollutant(s) causing the impairment(s):

E Coli

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

E Coli

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants:

No

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water (see definitions in 2021 MSGP, Appendix A)? ☒ Yes ☐ No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2021 MSGP Table 1-1)? ☐ Yes ☒ No

If Yes, which guidelines apply?

1.2 Contact Information/Responsible Parties.

Facility Operator(s):

Name: Raj Shah
Address: 101 Scott Drive
City, State, Zip Code: Leominster MA 01453
Telephone Number: 978-534-1800
Email address: rshah@spectrocoating.com

(repeat for multiple operators by copying and pasting the above rows)

Facility Owner(s):

Name: Raj Shah
Address: 101 Scott Drive
City, State, Zip Code: Leominster MA 01453
Telephone Number: 978-534-1800
Email address: rshah@spectrocoating.com

(repeat for multiple operators by copying and pasting the above rows)

SWPPP Contact(s):

SWPPP Contact Name (Primary): Craig Sylvester
Telephone number: 978-534-7327
Email address: craig_s@claremontflock.com

SWPPP Contact Name (Backup): Raj Shah
Telephone number: 978-534-1800
Email address: rshah@spectrocoating.com

1.3 Stormwater Pollution Prevention Team.

Staff Names	Individual Responsibilities
Craig Sylvester	Implementation of Plan, Inspections, Sampling, Training, Initiating Corrective Actions, Oversees Spill Response/Clean up
Ron Sparks	Back up to Craig Sylvester
Nick Rivard	Completing Corrective Actions, All Maintenance related activities

1.4 Site Description.

Spectro Coating has 2 divisions of the manufacturing operations. The flock division known as Claremont Flock and the coating division known as Spectro Coating.

Claremont Flock manufactures precision flock in fiber types that include but are not limited to: Nylon, Rayon, Polyester, Acrylic and Cotton. The raw material is cut, scoured, finished, dried and in some cases dyed.

Fiber raw material is delivered to the canopied loading docks at the far end of the building in drainage area 9 of outfall A. This raw fiber is delivered in cardboard boxes and is a continuous length of fiber. Any accidental spill of this material would be unable to enter the stormwater system.

Dyes and chemicals are delivered on an as needed schedule. They are delivered to the canopied loading docks at the mid-point of the building in drainage area 2 of outfall A. Any spill during the unloading procedure would have to travel to the catch basin located at the far end of paved area before it could enter the stormwater system.

All manufacturing processes and storage of materials takes place inside the facility. All drainage inside the facility is discharged to a wastewater treatment system before being discharged to the Leominster WWTP.

The raw fiber is scoured, finished, cut and dried and some material is dyed. The drying process takes place in cyclones which are vented through baghouse filtration systems before exhausting the air through stacks on the roof. There is a possibility of cut fiber being discharged into the atmosphere and or on the roof which could migrate to the stormwater system if there is a malfunction in the baghouse.

All materials including incoming raw uncut fiber, dyes, chemicals as well as outgoing finished goods are transported by tractor trailers using Scott Drive leading out of the industrial park onto Nashua Street.

A trash compactor is located in drainage area 2 of outfall A. The trash is compacted from inside the building into a completely enclosed container which is removed to be emptied weekly.

The wastewater treatment plant is located in drainage area 2 of outfall A. Two 31 foot by 31 foot by 14 foot deep aeration and equalization pits collect the PH adjusted effluent before discharging it to the Leominster WWTP. An overflow of these pits could result in effluent entering the stormwater system.

Storage trailers are located in drainage areas 7 and 8 of outfall A. The trailers contain some uncut fiber but are mostly used for storage of equipment. Any equipment stored in the trailers will have any liquids such as fuel or lubricants removed prior to being placed in the container.

Waste Oil is collected in a hazardous waste area inside the building. We have a very small quantity generator and the oil is removed as needed, approximately once every 2 years by a hazardous waste disposal service.

Spectro Coating adheres cut flock which includes but is not limited to Nylon, Rayon, Polyester, Acrylic and Cotton onto a substrate made from but not limited to Polyester/Cotton Blend, Polyester/Rayon Blend, and various plastic based sheeting using a water based acrylic adhesive.

Deliveries of substrate rolls, adhesive and occasionally dyes and chemicals are completed at the loading docks located in drainage area 1 of outfall B. Any spill could enter the catch basin located in close proximity to the loading docks.

All manufacturing processes and storage of materials takes place inside the facility. All drainage inside the facility is discharged to a wastewater treatment system before being discharged to the Leominster WWTP.

The coating operation is a dry process. Rolls of substrate are fed through the coating machine, adhesive is applied either as a solid coat or through a pattern screen. Flock is then seated into the adhesive and passes through a curing oven. The coated substrate is rolled as a finished good at the back end of the machine. Coated rolls can then be embossed with air or pressed with a pattern roll.

Adhesive application knives, pattern screens and adhesive pumps are rinsed clean in a wash down area. All water from this process is discharges in the wastewater treatment system and discharged to the Leominster WWTP.

All materials including incoming substrate, dyes, chemicals as well as outgoing finished goods are transported by tractor trailers using Scott Drive leading out of the industrial park onto Nashua Street.

A trash compactor is located in drainage area 4 of outfall B. The trash is compacted from inside the building into a completely enclose container which is removed to be emptied weekly.

Storage trailers are located in drainage areas 1, 2 and 3 of outfall B. The trailers contain maintenance and production equipment not in use. Any equipment stored in the trailers will have any liquids such fuel or lubricants removed prior be placed in the container.

1.5 General Location Map.

The general location map for this facility can be found in Attachment A.

1.6 Site Map.

The site map for this facility can be found in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

Section 2 will describe all areas at your facility where industrial materials or activities are exposed to stormwater or from which authorized non-stormwater discharges originate. Industrial materials or activities include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; intermediate products, by-products, final products, and waste products. Material handling activities include, but are not limited to: the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. For structures located in areas of industrial activity, you must be aware that the structures themselves are potential sources of pollutants. This could occur, for example, when metals such as aluminum or copper are leached from the structures as a result of acid rain.

For each area identified, the SWPPP must include industrial activities in the area, potential pollutants or pollutant constituents for each identified activity, documentation of where potential spills and leaks could contribute pollutants to stormwater discharges, evaluation of unauthorized non-stormwater discharges, salt storage location, stormwater discharge sampling data and descriptions of stormwater control measures.

2.1 *Potential Pollutants Associated with Industrial Activity.*

Industrial Activity	Associated Pollutants
Loading and Unloading trucks for shipping and receiving raw material and finished goods	Dyes, Chemicals, Adhesive, Flock Fiber
Roof exhaust stacks for process equipment	Flock Fiber
Waste Water Treatment System	Effluent
Trash Compacting Container	Flock, Solid Waste
Loading Waste Oil to truck	Waste Oil

If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis?

☐ Yes ☐ No

If you are a Sector G (Metal Mining) facility, do you have discharges from waste rock and overburden piles?

☐ Yes ☐ No

2.2 Spills and Leaks.

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Discharge Points
Loading Docks in drainage area 2 of outfall A	Outfall A
Trash Compacter in drainage area 2 of outfall A	Outfall A
Roof Exhausts in drainage area 3 of outfall A	Outfall A
Wastewater Treatment System in drainage area 2 of outfall A	Outfall A
Loading Docks in drainage area 1 of outfall B	Outfall B
Trash Compacter in drainage area 4 of outfall B	Outfall B

Description of Past Spills/Leaks

Date	Description	Discharge Points
N/A	No leaks/spills in 3 years prior to preparation date	N/A

2.3 Unauthorized Non-stormwater Discharges Evaluation.

Description of this facility's unauthorized non-stormwater discharge evaluation:

- Date of evaluation: 5/7/21
- Description of the evaluation criteria used: Review of schematics for the process and sanitary water drainage
- List of the discharge points or onsite drainage points that were directly observed during the evaluation: All drainage points were reviewed
- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), or documentation that a separate NPDES permit was obtained. For example, a floor drain was sealed, a sink drain was re-routed to sanitary or an NPDES permit application was submitted for an unauthorized cooling water discharge: No actions taken

2.4 Salt Storage.

N/A

2.5 Sampling Data Summary.

Quarterly visual inspections of all drainage areas, detention pond and catch basins. Quarterly visual inspection of samples taken from outfall A and B. Annual testing done of outfall A sample to measure presence of E Coli bacteria.

SECTION 3: STORMWATER CONTROL MEASURES (SCM)

3.1 *Non-numeric Technology-based Effluent Limits (BPT/BAT/BCT)*

You must comply with the following non-numeric effluent limits as well as any sector-specific non-numeric effluent limits in Part 8, except where otherwise specified.

3.1.1 Minimize Exposure.

No outside storage of any raw materials or finished goods. Compacting dumpsters are entirely closed containers. All loading docks are canopied and have bumpers attached. Maintenance and cleaning of all equipment is done within the facility.

3.1.2 Good Housekeeping.

No cleaning of equipment takes place outside of the facility. No raw material or finished goods are stored outside of the facility.

The 2 completely enclosed trash containers are removed for disposal on a weekly basis. Inspection for signs of leakage are done at that time.

Please see attachment C for internal housekeeping policy.

3.1.3 Maintenance.

Quarterly inspections of all curbing, catch basins and detention pond.

All internal baghouses are cleaned of dust accumulations when airflow indicators warrant.

Spill response equipment as detailed in Emergency Evacuation Plan. Attachment D

3.1.4 Spill Prevention and Response Procedures.

Spill response details in Emergency Evacuation Plan. Attachment D

3.1.5 Erosion and Sediment Controls.

No polymers or chemicals are used in sediment and erosion control. Paved areas are sloped to prevent pooling of stormwater runoff. Vegetation, graveled areas and the detention pond are used to manage storm water through infiltration. The primary means to control the storm water is through the storm water drainage system consisting of roof drains and catch basins.

3.1.6 Management of Stormwater.

Curbing, catch basins and a detention pond are used to reduce and control storm water. Attachment B

3.1.7 Salt Storage Piles or Piles Containing Salt.

N/A

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials.

The housekeeping plan in attachment C details dust control procedures.

3.2 ***Numeric Effluent Limitations Based on Effluent Limitations Guidelines (ELGs).***

N/A

Regulated Activity	40 CFR Part/Subpart	Effluent Limit
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	Part 429, Subpart I	See Part 8.A.8
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	Part 418, Subpart A	See Part 8.C.5
Runoff from asphalt emulsion facilities	Part 443, Subpart A	See Part 8.D.5
Runoff from material storage piles at cement manufacturing facilities	Part 411, Subpart C	See Part 8.E.6
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	Part 436, Subparts B, C, or D	See Part 8.J.10
Runoff from hazardous waste landfills	Part 445, Subpart A	See Part 8.K.7
Runoff from non-hazardous waste landfills	Part 445, Subpart B	See Part 8.L.11
Runoff from coal storage piles at steam electric generating facilities	Part 423	See Part 8.O.8
Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	Part 449	See Part 8.S.9

3.3 ***Water Quality-based Effluent Limitations and Water Quality Standards.***

The measures implemented to control storm water discharge and meet water quality standards are curbing, catch basins and detention pond as part of the storm water system. As well as canopied loading docks with bumpers attached and enclosed trash containers.

3.4 Sector-Specific Non-Numeric Effluent Limits.

The measures implemented to control storm water discharge and meet sector specific limits are curbing, catch basins and detention pond as part of the storm water system. As well as canopied loading docks with attached bumpers and enclosed trash containers.

SECTION 4: SCHEDULES AND PROCEDURES

4.1 Good Housekeeping.

Housekeeping policy. Attachment C

4.2 Maintenance.

Quarterly inspections of catch basins. Catch basins will be emptied when they reach the two thirds mark.

4.3 Spill Prevention and Response Procedures.

Spill prevention and response detailed in emergency evacuation plan. Attachment D

4.4 Erosion and Sediment Control.

No chemicals or polymers used in erosion and sediment control.

4.5 Employee Training.

On boarding training for new employees and annual training for all employees of emergency evacuation plan which includes spill prevention and clean up. Annual training for production employees on housekeeping policy. All members of the storm water pollution prevention team are training annually on SWPPP.

4.6 Inspections and Assessments.

4.6.1 Routine Facility Inspections.

Quarterly inspections of all drainage areas, catch basins, curbing, detention pond and outfalls.

Daily opacity inspection of all baghouse exhaust stacks as well as rooftop inspection for signs of dust discharge.

For routine facility inspections to be performed at your site, your SWPPP must include a description of the following:

1. **Person(s) or positions of person(s) responsible for inspection.** Primary – Craig Sylvester / Back up – Ron Sparks

Note: Inspections must be performed by qualified personnel with at least one member of your stormwater pollution prevention team participating. Inspectors must consider the results of visual and analytical monitoring (if any) for the past year when planning and conducting inspections. Qualified personnel are those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can also evaluate the effectiveness of control measures.

2. **Schedules for conducting inspections, including tentative schedule for facilities in climates with irregular stormwater discharges.** Inspections will be conducted quarterly during a storm event

Note: The qualified personnel must conduct inspections at least quarterly (i.e., once each calendar quarter), or in some instances more frequently (e.g., monthly). Increased frequency may be appropriate for some types of equipment, processes and stormwater control measures, or areas of the facility with significant activities and materials exposed to stormwater. At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring.

3. **List areas where industrial materials or activities are exposed to stormwater.** Loading docks, roof exhaust stacks, waste water treatment system, trash containers.
4. **List areas identified in the SWPPP (section 1 of the SWPPP Template) and those that are potential pollutant sources (see Part 6.2.3).** Loading docks, roof exhaust stacks, waste water treatment system, trash containers.
5. **Areas where spills and leaks have occurred in the past three years.** None
6. **Inspection information for discharge points.** Outfall A is 48 inch galvanized steel corrugated pipe located at 42.530413 -71.739191 / Outfall B is a 48 inch galvanized steel corrugated pipe located at 42.529452 -71.738446
7. **List the control measures used to comply with the effluent limits contained in the 2021 MSGP.** Curbing, catch basins and detention pond as part of the storm water system. Canopied loading docks and enclosed trash containers.
8. **Other site-specific inspection objectives.** None

4.6.2 Quarterly Visual Assessment of Stormwater Discharges.

A discharge grab sample will be collected from outfalls A&B quarterly at the time of a storm event. The sample will be collected within the first 30 minutes of discharge ensuring that 72 hours have passed from the last storm event.

The sample will be contained in a clear container and examined in a well-lit area. The sample will be observed for color, clarity, odor, suspended solids, floating solids, foam and oil sheen. The results will be documented on monitoring report form.

For quarterly visual assessments to be performed at your site, your SWPPP must include a description of the following:

1. **Person(s) or positions of person(s) responsible for assessments.** Primary – Craig Sylvester / Backup – Ron Sparks
2. **Schedules for conducting assessments.** SAMPLES WILL BE TAKEN QUARTERLY AT THE TIME OF A STORM EVENT

Specific assessment activities. The sample will be contained in a clear container and examined in a well-lit area. The sample will be observed for color, clarity, odor, suspended solids, floating solids, foam and oil sheen. The results will be documented on monitoring report form.

4.6.3 Exception to Routine Facility Inspections and Quarterly Visual Assessments for Inactive and Unstaffed Sites.

- ☐ This site is inactive and unstaffed, and has no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii) as signed and certified in Section 7 below.

If you are invoking the exception for inactive and unstaffed sites for your routine facility inspections and/or quarterly visual assessments, include information to support this claim.

N/A

4.7 Monitoring.

Check the following monitoring activities applicable to your facility:

- ☒ Indicator monitoring
- ☐ Benchmark monitoring
- ☐ Effluent limitations guidelines monitoring
- ☐ State- or tribal-specific monitoring
- ☒ Impaired waters monitoring
- ☐ Other monitoring required by EPA

For each type of monitoring checked above, your SWPPP must include the following information:

Select type of monitoring activity from drop-down list below (if subject to more than one type of monitoring activity, you will need to copy and paste the items below for each monitoring activity):

Impaired waters monitoring

1. **Sample location(s).** Outfall A
2. **Pollutants to be sampled.** E. Coli
3. **Monitoring Schedules.** Annual
4. **Numeric Limitations.** N/A
5. **Procedures.** The sample will be collected annually at the time of a storm water event. The sample will be collected within 30 minutes of the start of the discharge and be greater than 72 hours since the last storm event. The sample will be collected in a laboratory supplied sterile collection container and delivered to R.I. Analytical Laboratory in Hudson MA within 8 hours of collection.

Indicator monitoring

6. **Sample location(s).** Outfall A
7. **Pollutants to be sampled.** PH, TSS, COD
8. **Monitoring Schedules.** Quarterly
9. **Numeric Limitations.** N/A
10. **Procedures.** The sample will be collected annually at the time of a storm water event. The sample will be collected within 30 minutes of the start of the discharge and be greater than 72 hours since the last storm event. The sample will be collected in a laboratory supplied container and delivered to R.I. Analytical Laboratory in Hudson MA within 8 hours of collection.

Note: it may be helpful to create a table with columns corresponding to # 1 - 5 above for each type of monitoring you are required to conduct.

Exception for Inactive and Unstaffed Facilities (if applicable)

- ☐ This site is inactive and unstaffed, and has no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii) as signed and certified in Section 7 below.

Exception for Substantially Identical Discharge Points(SIDP) (if applicable)

If you plan to use the SIDP exception for your quarterly visual assessment requirements in 2021 MSGP Part 3.2.4 or your indicator, benchmark, or impaired waters monitoring requirements in 2021 MSGP Parts 4.2.1, 4.2.2, and 4.2.5, respectively, include the following information here to substantiate your claim that these discharge points are substantially identical (2021 MSGP Part 6.2.5.3.d):

- Location of each SIDP: Outfalls A&B as indicated in Attachment B.
- List the general industrial activities conducted in the drainage area of each discharge point: Loading docks, roof exhaust stacks, waste water treatment system, trash containers
- List the control measures implemented in the drainage area of each discharge point: curbing, catch basins, detention pond
- List the exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants via stormwater discharges: None
- An estimate of the runoff coefficient of the drainage areas (low = under 40%; medium = 40 to 65%; high = above 65%): Medium
- Why the discharge points are expected to discharge substantially identical effluents: The 2 facilities are in 1 connected building and each manufacture the same end product.

SECTION 5: DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

5.1 *Documentation Regarding Endangered Species Act (ESA) Listed Species and Critical Habitat Protection.*

Attachment E

5.2 *Documentation Regarding National Historic Preservation Act (NHPA)-Protected Properties.*

Eligibility Criterion A

SECTION 6: CORRECTIVE ACTIONS AND ADDITIONAL IMPLEMENTATION MEASURES

Corrective actions will be taken if an unauthorized release or discharge occurs, if a visual assessment shows evidence of stormwater pollution. Any corrective actions will be acted on immediately to prevent or minimize the discharge of pollutants in a storm event.

All corrective actions will be documents in the SWPPP.

All sampling is report only with no baseline or threshold values.

SECTION 7: SWPPP CERTIFICATION

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 contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Rajesh Shah Title: VP
Signature:  Date: 5/20/2021

SECTION 8: SWPPP MODIFICATIONS

Instructions (see 2021 MSGP Part 6.3):

Your SWPPP is a “living” document and is required to be modified and updated, as necessary, in response to corrective actions and deadlines. See Part 5 of the 2021 MSGP.

- If you need to modify the SWPPP in response to a corrective action required by Part 5.1 or AIM required by Part 5.2 of the 2021 MSGP, then the certification statement in section 7 of this SWPPP template must be re-signed in accordance with 2021 MSGP Appendix B, Subsection 11.A.
- For any other SWPPP modification, you should keep a log with a description of the modification, the name of the person making it, and the date and signature of that person. See 2021 MSGP Appendix B, Subsection 11.C.

SECTION 9: SWPPP AVAILABILITY

Instructions (see 2021 MSGP Part 6.4):

Your current SWPPP (with the exception of any confidential business or restricted information) must be made available to the public. You have three options to comply with the public availability requirements for the SWPPP: attaching your SWPPP to your NOI; providing a URL of your SWPPP in your NOI; or providing the following SWPPP information in your NOI:

- Onsite industrial activities exposed to stormwater, including potential spill and leak areas;
- Pollutants or pollutant constituents associated with each industrial activity exposed to stormwater that could be discharged in stormwater and/or any authorized non-stormwater discharges;
- Stormwater control measures you employ to comply with the non-numeric technology-based effluent limits and any other measures taken to comply with the water quality based effluent limits; and
- Schedule for good housekeeping and maintenance and schedule for all inspections.

SWPPP ATTACHMENTS

Attach the following documentation to the SWPPP:

Attachment A – General Location Map

Attachment B – Site Map

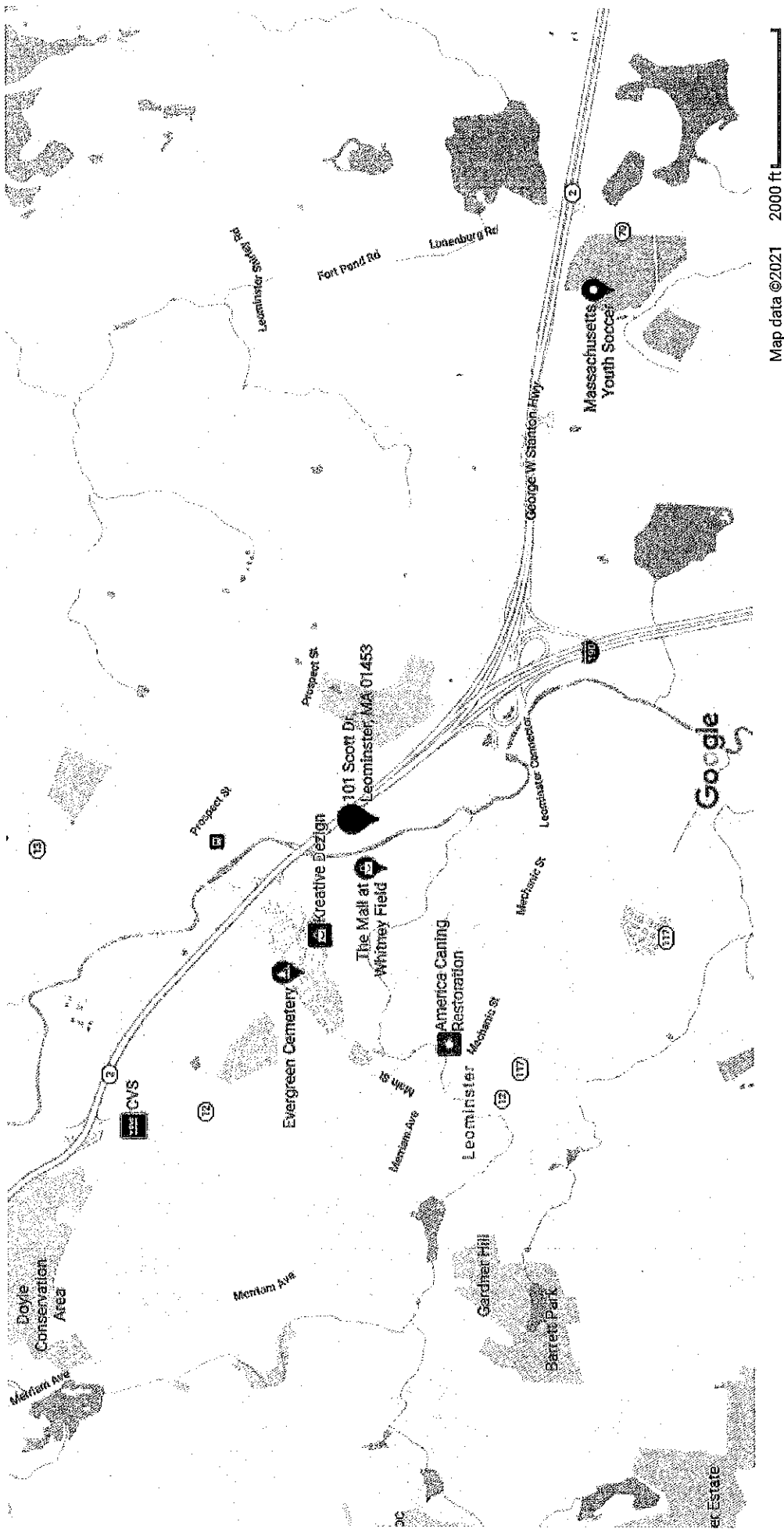
Attachment C –Housekeeping Policy

Attachment D – Emergency Evacuation Plan

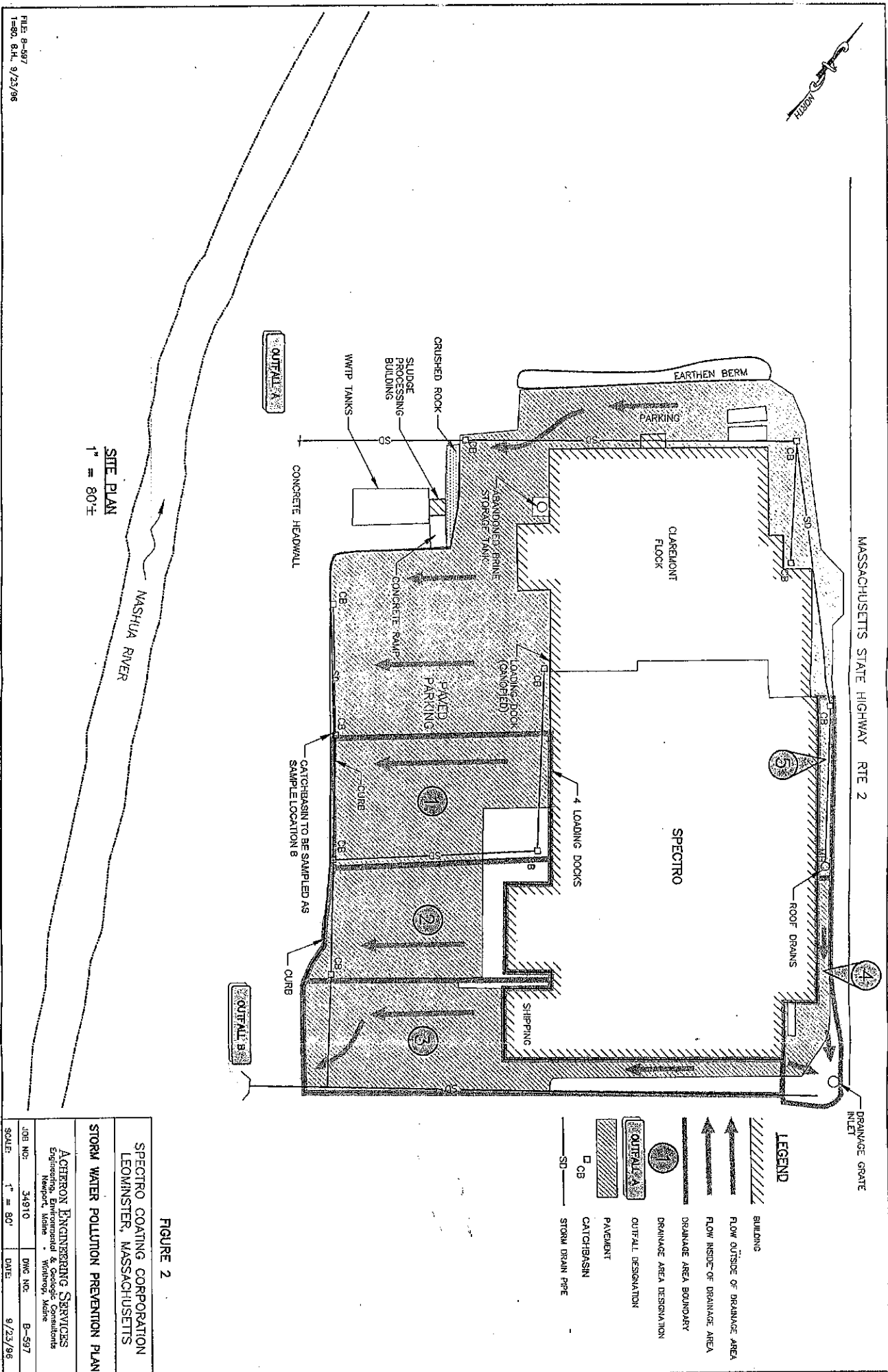
Attachment E – Endangered Species Report

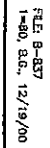
Attachment F – 2021 MSGP

Attachment A



Attachment B






SITE PLAN
1" = 80'±

CLAREMONT FLOCK CORPORATION CLAREMONT, NEW HAMPSHIRE	
STORM WATER POLLUTION PREVENTION PLAN LECOMINSTER, MASSACHUSETTS SITE	
ARCHERON ENGINEERING SERVICES 1000 North Main Street Department of Civil Engineering Northport, Maine 04851	
JOB NO.	DWG. NO.
34510	E-837
SCALE: 1" = 80'	DATE: 12/16/00

Attachment C

SPECTRO COATING / CLAREMONT FLOCK CORP.	
Housekeeping Program	Revision Date: 2021

Policy: Through the actions of all personal Spectro Coating will maintain clean, orderly, sanitary, and safe work areas, materials, and equipment, and eliminate or control employee exposure to hazardous conditions.

PROGRAM ADMINISTRATION

Function	Name	Phone
Plan Administrator	Craig Sylvester	978-534-7327

Plan Administrator. The Plan Administrator will:

- Implement the housekeeping program.
- Enforce all safety policies and procedures in this Plan.

The Administrator may designate and authorize other personnel, including managers and supervisors, to implement the requirements of this Plan.

Designees (including Supervisors). Designees will:

- Continually conduct safety checks of work operations.
- Ensure that employees follow safety procedures and policies in the Plan.

Employees. All employees must:

- Follow the procedures of this Plan and the instructions of their supervisor.
- Report any unsafe or hazardous conditions or acts that may cause injury to either themselves or any other employees.
- Keep work areas uncluttered, orderly, sanitary, and free of other hazards that could result in personal injury or injury to others.

Plan Review and Update

This Plan will be reviewed annually by all supervisors and changed or updated as needed to ensure the program's effectiveness.

HOUSEKEEPING AREAS—SAFE WORK PRACTICES

Supervisors and employees will implement the following safe work practices for housekeeping in all areas of the facility.

All Working Surfaces

- Keep all walking and working surfaces clean, sanitary, and orderly.
- Keep work surfaces dry.
- Clean up small spills immediately; report large spills to a supervisor.
- Ensure that all walking surfaces, working surfaces and passageways are free from holes, or loose flooring.

Floors

- Provide warning signs for wet floor areas.
- Immediately clean up all spilled hazardous materials or liquids according to the emergency evacuation plan.
- Immediately repair, cover, or otherwise make safe any holes in the floor or other walking surface.
- Re-lay or stretch carpets that bulge or have become bunched to prevent tripping hazards.
- Promptly remove flock, dust, debris, and waste, and discard them according to the waste disposal procedures.
- Eliminate uneven floor surfaces.

Wet Floors

- Where wet processes are used, ensure that drainage channels are kept clear.
- Use appropriate footwear to decrease slip and fall hazards in areas that are frequently wet.
- In non wet process areas mark wet surfaces with appropriate signage.

Aisles and Passageways

- Keep aisles and passageways clear and marked as appropriate.
- Ensure there is safe clearance for walking in aisles that are also fork truck lanes.
- Clean up small spills immediately, and report large spills to a supervisor.

Elevated Surfaces

- Pile, stack, or rack material on elevated surfaces in a manner that will prevent the material from tipping, falling, collapsing, rolling, or spreading.
- Use dock boards or bridge plates when transferring materials between docks and trucks.

Entryways and Exits

All entryways and exits will be kept clean, dry, and clear of all obstructions. Follow the housekeeping requirements in the **Fire Exits** section of this Plan.

Stairs

All stairways will be kept clean, dry, and free of debris.

No accumulation of any material will be allowed on stairs or in stairways or stairwells.

Lighting

Ensure that all halls and stairwells are well lighted to help reduce accidents and promote security. Replace light bulbs and/or fixtures as necessary to maintain adequate lighting at all times.

FIRE AND EXPLOSION PREVENTION

Flammable and combustible materials and residues will be controlled in fire proof cabinet so that they do not cause or contribute to a fire emergency.

Maintenance of Ignition Sources

Equipment and systems installed on heat or ignition producing equipment and processes will be maintained to prevent the accidental ignition of flammable and combustible materials.

Dry Combustibles

Keep combustibles such as paper, cardboard, wooden pallets, or rags in designated locations away from ignition sources. The accumulation of such material provides a place for a fire to start and spread quickly.

Extension Cords

- Electric extension cords will be inspected before each use and kept in good condition.
- Employees will not yank cords from electrical outlets.
- Tools and equipment that require grounding will be of the three-wire grounded-connection type.
- Never use extension cords to replace permanent wiring.
- If an extension cord is used for temporary wiring, it must be listed by a recognized testing laboratory.
- Avoid kinking or excessive bending of the cord; broken strands may pierce the insulated covering and become a shock or short-circuit hazard.

Flammable and Combustible Liquid Storage**General Safe Work Practices**

- No open flames, smoking, sparks, or welding will be allowed in storage areas with flammable liquids.
- Keep flammable and combustible liquids away from direct sunlight and stored in a cool, dry place.
- Store oxidizers and other incompatible materials away from flammable and combustible liquids to prevent a dangerous reaction.

Containers

Flammable and combustible liquids will be stored in approved fire-resistant containers. Ensure that such containers are grounded and bonded during any transfer of flammable or combustible liquids between containers. These containers prevent sparks and other ignition sources from igniting the liquids stored in them. Keep the containers closed when not in use.

Electrical and Hot Equipment

- Keep combustible materials, dust, and grease away from electrical equipment and hot machinery.
- Maintain a clear access to electrical panels at all times so that they can be opened quickly in case of an emergency that requires the power to a machine or the building to be shut down.

Fire Exits

- Always keep evacuation routes clear.
- Don't store boxes or other items in aisles, hallways, or stairwells that lead to emergency exits.
- Ensure that exit doors are kept clear on both sides so that they can be easily opened in an emergency.

Fire Extinguishers

- Fire extinguishers will not be used as hangers for coats, air hoses, electrical cords, or anything else.
- Access to extinguishers will be kept clear at all times.
- Extinguishers will always be kept visible. They will not be blocked by stacks of boxes, forklifts, or other items.

Combustible Dust

- Combustible dusts that accumulate on surfaces can cause a deflagration, other fires, or an explosion.

Criteria for Dust Cleanup

Immediate cleaning and collection of accumulated combustible dust is warranted whenever a layer of combustible dust 1/32-inch thickness (i.e., approximately the thickness of a typical paper clip) accumulates over a surface area of at least 5 percent of the floor area of the facility or any given room.

Accumulations on overhead beams, joists, ducts, the tops of equipment, and other surfaces should be included when determining the dust coverage area. Vertical surfaces will be included if the dust is adhering to them. Likely areas of dust accumulations within a plant are:

- Structural surfaces (beams and rafters)
- Conduit and pipes
- On desks and work stations
- Floors
- On and around equipment

Procedures for Dust Cleanup

Flock and dust clean up should be done constantly during the day in between work tasks. The flock and dust must be vacuumed. Gentle sweeping may be used on small amounts of flock or dust if done in a manner that does not create a dust cloud of any size. Blowing with compressed air will not be used for dust removal while machine is energized.

Full cleans of equipment will be done with the lockout procedure followed. With the equipment de-energized vacuum flock and dust. Brushes that are part of the equipment may be cleaned with blown compressed air ONLY after all other flock and dust in and on the equipment and the surrounding area has been cleaned and properly disposed of.

Hot Work Near Dust Collection Points

The Administrator or designee will ensure that approved hot work permits are issued for any hot work in areas where hazardous levels of dust accumulations may occur. In addition, anyone who performs combustible dust collection operations near hot work on and around collection points and ductwork must receive written approval to perform such work from the issuer of the hot work permit. Dust collection operations will not be conducted while hot work operations are in progress.

WASTE RECYCLING AND DISPOSAL

The Administrator or designee will ensure that the following waste recycling and disposal procedures are implemented in all work areas where such waste is generated:

- All waste materials will be promptly collected and disposed of in the trash compactor.
- Boxes and other cardboard packaging will be broken down and either strapped to a pallet or baled and stored in the designated cardboard recycling area.
- All waste receptacles will be clearly labeled and emptied before reaching the full point.

HAZARDOUS CHEMICAL SPILL CONTROL

The Administrator or designee will implement procedures for the cleanup of large and small hazardous chemical spills at the facility. Large spills will be managed according to the facility's Emergency Evacuation Plan.

Spill Safety Plan.

Small Spills

The following procedure will be followed by all employees when a small chemical spill less than one gallon of diluted chemicals has occurred:

1. Notify supervisor.
2. Follow any instructions described in the safety data sheet (SDS).
3. Small spills must be handled in a safe manner while wearing the proper PPE.
4. Use absorbent material to clean up the spill.
5. Absorbents must be disposed of properly and safely.

Large Spills

1. If a spill of greater than one gallon of diluted chemical and any quantity of a non diluted chemical occurs, notify your supervisor immediately and secure the area so others cannot cross into the area.

ELECTRICAL PARTS AND EQUIPMENT

Employees will not perform housekeeping duties near live electrical parts where there is a possibility of contact, unless adequate safeguards such as insulating equipment or barriers are provided.

Electrical equipment will be kept free of dust, debris, and grease.

GENERAL STORAGE

The Administrator or designee will ensure that the following general material storage procedures are implemented:

- Store or stack materials to allow a clear space of 3 feet or more under water sprinkler heads.
- Stack cartons and drums on a firm foundation and cross-tie them where necessary to reduce the chance of their movement.
- Do not allow stored materials to obstruct aisles, stairs, exits, fire equipment, emergency eyewash fountains, emergency showers, or first aid stations.
- All storage areas will be clearly marked.

MACHINES AND TOOLS

Machines

- Keep the area around machines clear of combustibles, slip and trip hazards, or any other debris.
- Inspect machines before use.
- Ensure that all guards are in place and operating properly.
- Follow lockout procedures when servicing or repairing a machine.
- When done using the machine put away tools and clean up both the machine and the work area.

Hand and Power Tools

- Store blades and sharp tools carefully so that they do not create a hazard when not in use.
- Store new blades in labeled boxes to prevent accidental exposure.
- Old blades should have the sharp edge covered with tape or cardboard and discard the blade directly into a metal trash container or Dumpster.
- Keep blades on utility knives sheathed or retracted when not in use.

PPE

The Administrator or designee will ensure the appropriate PPE is provided to and worn by employees performing housekeeping activities and that the PPE is in good condition.

PPE for housekeeping operations may include:

- Eye protection
- Gloves
- Proper shoes
- Respirators
- Hearing Protection
- Protective clothing

Employees involved in housekeeping activities will implement the following PPE use and care procedures:

- Inspect PPE before each use, checking for signs of wear or damage.
- Keep PPE clean.
- Store PPE properly according to instructions on labels or received during training to prevent damage or contamination from dirt or chemicals.
- Replace PPE when it is worn out, damaged, or no longer provides the protection that is required.

When performing housekeeping tasks, employees will select the right equipment for the job, including the right PPE. Employees must consult with a supervisor concerning appropriate PPE when starting a new job or housekeeping task.

INSPECTIONS

Programs related to housekeeping will be regularly monitored to ensure a high standard of sanitation and safety in all work areas, as well as to identify deficiencies. The Administrator or designee(s) will conduct regular inspections of work areas to monitor hazards and ensure that housekeeping safe work practices are implemented.

Inspection Documentation

Copies of inspection checklists or reports will be kept by the training department.

EMERGENCIES

The Administrator or designee will ensure that:

- All evacuation routes are clearly marked and unobstructed.
- Access to fire extinguishers and other emergency equipment is unobstructed.
- All emergency-related signs, placards, posters, notices, and markings are clearly visible and legible at all times.
- All used emergency and fire-fighting equipment is replaced.

Post-emergency cleanup operations will be conducted by personnel trained and authorized to perform specific cleanup tasks.

TRAINING

The training department will provide housekeeping training to all employees at the time of hire and as needed thereafter.

Supervisors will provide safety meetings or talks to employees as a group and to individual employees who fail to follow safe procedures.

Attachment D

SPECTRO COATING CORP.

EMERGENCY EVACUATION PLAN

Updated: 2021

I. PURPOSE of POLICY

To ensure the safe evacuation of all individuals in the Spectro Coating Corp. facility during an emergency. The following program shall comply with OSHA Standard 29 CFR 1910.38 Employee Emergency Evacuation Plans, OSHA Standard 29 CFR 1910.157 Fire Extinguisher Program and 29 CFR 1910.165 Alarm Systems. It is also the policy of the company to comply with all state legislation in the area of Occupational Safety and Health. The Safety Committee Chairman shall be responsible for ascertaining additional local requirements and assuring compliance. All public relations or media issues are to be directed to the President of Spectro Coating Corp or the President of Spectro Coating Corporations Flock division. An individual who requires special assistance to evacuate the building must make the HR & Safety department aware of this so that proper provisions can be made to accommodate them.

II. OBJECTIVES

- a. Maintain a written plan that will provide for timely and safe evacuation of all employees, guests, and vendors in the event of any and all emergencies (fire, natural disaster, accident or hazardous materials incident) where the health and/or safety of these people is in immediate or eminent danger.
- b. Teach each employee his or her part in the plan through training.
- c. Train the employee on the plan when:
 - *The plan is changed.*
 - *A new employee is hired, before they do actual work in the facility.*
 - *A previously trained employee is returning from an extended absence of more than 30 business days.*
 - *A temporary employee is brought in to do work.*
- d. Execute the plan at least once each calendar year, in the form of drills or actual evacuations. Evaluate the drills/evacuations and correct any issues that arise, document this. See Addendum G.
- e. Maintain Portable Fire Extinguishers in locations as prescribed by the OSHA Standard 1910.157.
- f. Train employees to use Portable Fire Extinguishers; document the training.

III. ROLES/PROCEDURE

a. Employees/Temporary Staff

1. Any employee who sees a fire, natural disaster, accident, or hazardous materials incident, or the threat of any of these should warn all persons in the immediate area so that employees can leave the area as quickly as possible. If safe, they should shut down their equipment before doing so. *It may be possible and safe to put out small fires with a portable fire extinguisher as taught in extinguisher training before notification to workers and supervisor. DO NOT ATTEMPT TO FIGHT LARGE FIRES; PULL FIRE STATION ALARM AND EVACUATE THE FACILITY IMMEDIATELY.*
2. In the event of a natural disaster, accident, hazardous materials incident (any incident besides large fires) it is the staff member's responsibility to immediately notify a supervisory person and to notify endangered nearby employees. *The decision to activate an emergency evacuation will rest on the Emergency Coordinator in these cases.* Shutdown nearby or effected machinery if safe to do so.
3. If an Emergency Evacuation alarm is activated, calmly and orderly exit the building to the assigned evacuation assembly area. Once there stay for attendance to be taken and await further instruction from the facility incident commander. See ADDENDUM A.

b. Managers/Supervisors

1. Notify the Emergency Coordinator immediately if any of the above Emergencies occur. ***DO NOT ATTEMPT TO FIGHT LARGE FIRES; PULL FIRE STATION ALARMS AND EVACUATE THE BUILDING IMMEDIATELY.***
2. If an emergency evacuation is initiated without the Manager's/Supervisor's knowledge; ensure that the emergency evacuation is taking place by quickly notifying as many employees as is possible on the way out of the building to the evacuation assembly area. Managers/Supervisors will not sweep the building unless they are acting as an Evacuation Monitor due to an absence.
3. Once assembled in the evacuation assembly area, Managers/Supervisors are to take attendance of the employees in their charge and report this to the Emergency Coordinator and await further instruction from him/her.

c. **Facility Emergency Coordinator /Co-Facility Emergency Coordinator**

1. Responsible for overseeing the safe, effective evacuation of the facility and coordinating efforts with all local, state and federal authorities. **Overall Site Evacuation Manager.**
2. Only person to activate the evacuation alarm in cases other than non-Extinguishable fires. May delegate someone to pull the alarm.
3. Follows up each alarm activation with a call to the local authorities (Fire Dept.) to give details of any situation(s). May delegate someone to do this.
4. Notifies immediate neighbors of any situations that may involve the Evacuation of their personnel or other dangers. May delegate someone to do this.
5. Takes attendance of evacuated personnel insuring that all people in the facility have been evacuated. Coordinates to find any missing personnel. Gives group further instructions.
6. Gives authorization for people to re-enter the facility after conferring with the State and local authorities, once the situation(s) have been stabilized.

d. **Visitors, Guests, Vendors**

1. Any individual that is responsible for signing a visitor, guest or vendor into this facility from the front office desk is responsible for ensuring that these person(s) are led out of the facility in the event of evacuation. They may delegate another staff member of Spectro to ensure that this is done if they are not going to be in the same immediate area as the visitor, guest or vendor. No visitor, guest or vendor can be permitted into the facility if they have not been properly signed in at the front desk and have been issued a badge at the front desk. Remember, *if you sign a person in, you are responsible for their safe evacuation from the Spectro facility.*

e. **Truck Drivers/Shipping Area**

1. Truck drivers are the only class of visitor, guest, or vendor that is not routinely signed in at the front desk and issued a badge. As such, it is the Logistics Manager and or the Shipping/Receiving Supervisor or designates' responsibility to know where any truck driver is in the facility and to ensure their safe evacuation of the facility in the event of fire or other health and safety issue where evacuation may be needed

f. **Evacuation Monitors**

1. Monitor the evacuation of their assigned areas and departments, and assist the overall safe exit from the facility.
2. Do a final check of all areas assigned to help ensure there are no un-notified personnel or otherwise hindered person(s). Assist any people as needed. **At no time is the monitor to put themselves in danger while performing their duties!** They are not to act as a rescuer but more as a final notification of evacuation and a reporter of any issues during the evacuation.
3. Make sure that the fire door between the front of Range 1 and the back warehouse is closed.
4. Report to the Incident Commander once you have exited the facility.
4. The current list of Evacuation Monitors will be maintained by the Safety Committee Chairman. For additional information see **ADDENDUM C**.

IV. MAINTENANCE OF PLAN AND SYSTEMS

a. **Safety Committee Chairman:**

1. Annual drills and documentation of drills including procedural issues needed to be addressed, as learned from drills. Actual evacuation(s) may be used as a drill if one should occur during the year. See **ADDENDUM G**
2. Overall responsibility for keeping the Plan up-to-date, Chemical Spill contact. See **Discharge and Slug Control section**.
3. Retaining all records of training, attendance of evacuation and evacuation drills.
4. Training of Evacuation Monitors on a yearly basis.
5. Facilitate and document the annual training of employees in the use of portable fire extinguishers.
6. Facilitate and document yearly inspections of all portable fire extinguishers by state certified vendor.

b. Production Manager:

1. Assistance in the selection of Emergency Evacuation Monitors and assigning them to areas which they will be responsible to search in case of an evacuation. Update Safety Committee Chairman when a change in monitors takes place.
2. Keeping accurate daily attendance sheet and taking it to the evacuation assembly area in the event of an evacuation. This may be accomplished through delegation to supervisory personnel.
3. Secondary Emergency Coordinator.
4. Ensures training through supervisory personnel. To train all production personnel on emergency evacuation before working in the facility. Documents training and passes on to Safety Committee Chairman for recordkeeping.

c. Building/Facilities Manager

1. All testing of the emergency fire/evacuation pull stations once every two months. See **ADDENDUM B**.
2. All inspection of fire main valve on a yearly basis.
3. Testing of Emergency lighting on a yearly basis as well as a once every three Year test of the lighting patterns, and documentation of these tests.
4. Documentation of all testing/inspection that is needed including items 1 & 2.

d. Building Manager/Maintenance Team Leader.

1. Documentation and performance of all portable fire extinguisher inspections on a monthly basis. Routine cleaning of all portable fire extinguishers, same for fire suppression valving system. See **ADDENDUM E and F**.
2. Documentation and performance of all exit emergency lighting testing on a monthly basis. See **ADDENDUM E and F**.
3. Facilitate and document monthly the inspection of all facility eye wash/shower stations. See **ADDENDUM H**.

e. **Maintenance Supervisor**

1. Training of all maintenance personnel on Emergency Evacuation Plan Before they are allowed to work in facility. Documentation of training To be turned into the Safety Committee Chairman for record keeping.

V. TRAINING

- a. Emergency Evacuation Training for employees prescribed in section II c. Will be conducted in the following way, regardless who administers the training:

1. An overview of this plan and the employee's duties under the plan.
2. Employee walk through to their work area and show them the primary exit they will use in an emergency evacuation. Show them the secondary exit(s) available and posted signs/maps.
3. Employee walk through to the "evacuation assembly area" and explain how attendance will be taken.
3. Show the new employee the emergency alarm pull station and explain how and when to use it, and the rules for its use. Explain when the alarm is tested and instruct the employee to note its sound.

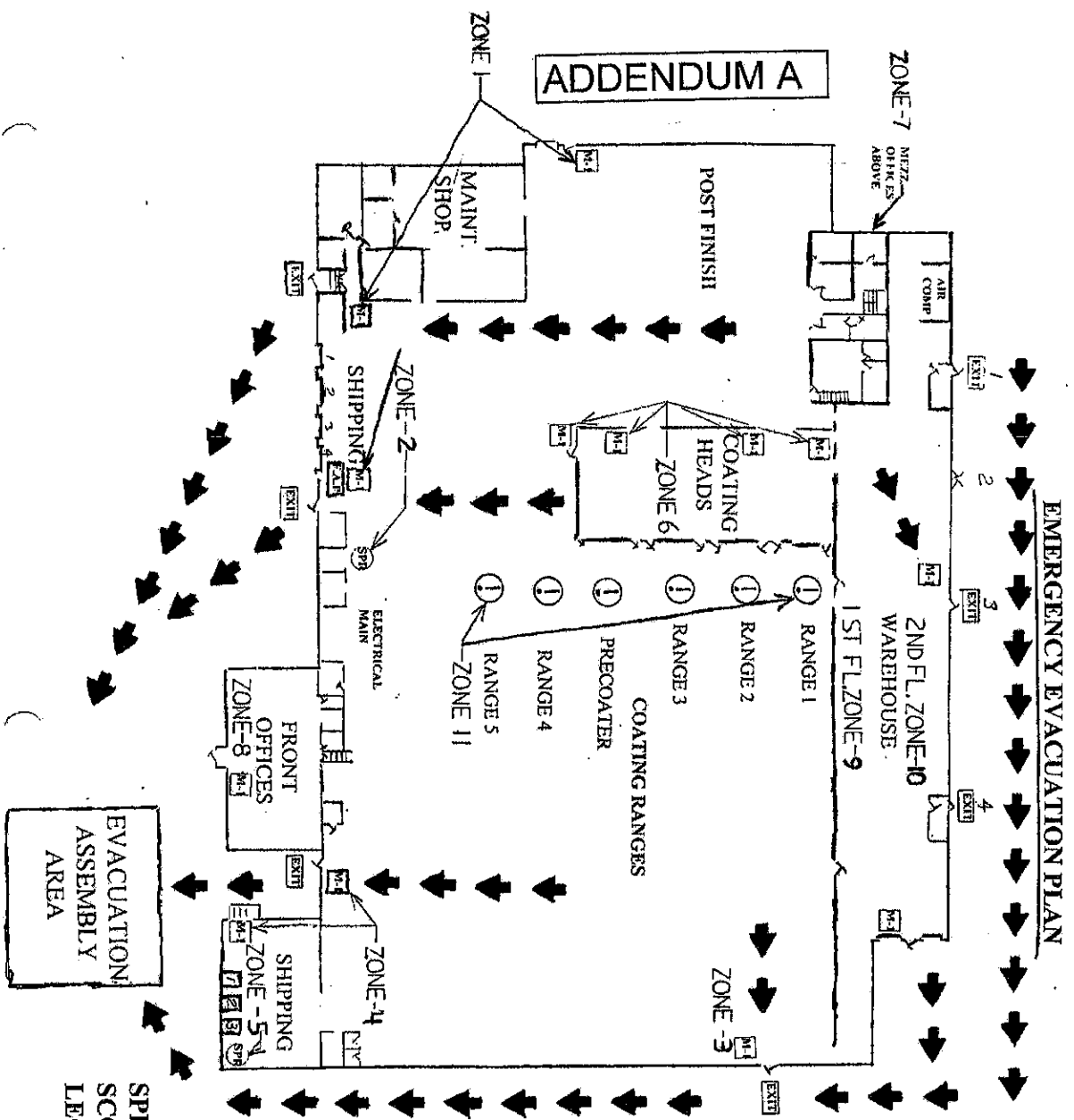
b. **Fire Extinguisher Training**

1. A certified/experienced person will train all employees in the use of portable, hand-actuated fire extinguishers.
2. The training will be done annually. The training will consist of the following:
 - a. Understanding the use of and how an extinguisher operates.
 - b. Verbal instructions on how to use a fire extinguisher properly.
 - c. Explanation of how monthly inspection of extinguishers occurs.

EMERGENCY RESPONSE PLAN

LIST OF ADDENDA

ADDENDUM A	Evacuation Routes, Alarm pull stations, Building Floor Plan
ADDENDUM B	Alarm System Testing and Inspection
ADDENDUM C	Training of Evacuation Monitors and their Assigned Areas
ADDENDUM D	Emergency phone #'s and Incident Control Personnel
ADDENDUM E	Fire Extinguisher Mapping, Fire Hose connection mapping
ADDENDUM F	Guidelines for Monthly Inspection of Emergency Lighting / Fire Extinguishers (and checklists)
ADDENDUM G	Evacuation Assessment Form.
ADDENDUM H	Emergency Eye Wash Station inspection procedure and mapping.
ADDENDUM I	Chemical Spill/Response procedures



EMERGENCY EVACUATION PLAN

- EXIT - EXIT DOOR LOCATION
- M-1 - 1ST FLOOR PULL STATIONS
- M-2 - 2ND FLOOR PULL STATIONS
- SPR - SPRINKLER RISER
- F.A.P. - FIRE ALARM PANEL
- ① - FLOOR ROOM SENSORS

EMERGENCY RESPONSE CONTACTS

Fire Dept. (978) 534-6544 or 911
 Police Dept. (978) 534-4383 or 911
 Emergency Medical (978) 534-6544 or 911

INCIDENT COMMANDER LIST

Phil Landry (508) 421-3387
 Bill Ayotte (Days)
 Mitch Seguin/Joe Vrabiel (nights)

SPECTRO COATING CORP.
 SCOTT DRIVE
 LEOMINSTER, MASS.

YEAR: _____

[illegible]

*TO BE PERFORMED ONCE EVERY TWO MONTHS ON A DIFFERENT PULL STATION EVERY TIME

ADDENDUM C

EMERGENCY EVACUATION MONITOR'S DUTIES And PERSONNEL ASSIGNED

Evacuation Monitors:

OSHA Standard 1910.38 requires each employer with 10 or more employees to train Emergency Evacuation Monitors to assist management in the safe orderly evacuation of the areas involved in or threatened by an emergency. The OSHA Standard recommends one monitor for each 20 employees. The main goal is to have everyone out of the building within *one* minute (60 seconds) after the alarm sounds.

DUTIES;

1. Monitor the evacuation of their department. **AT NO TIME DURING PERFORMING THE DUTIES OF EVACUATION MONITOR IS THE MONITOR TO PUT THEMSELVES IN PERSONAL DANGER OR PERFORM "RESCUE DUTIES".**
2. Check assigned area to assure that all employees, guests and vendors have evacuated. This includes all offices, storerooms, toilets, and equipment rooms where a person might be working.
3. Make sure that both overhead fire doors are closed.
4. Exit building as assigned and report to supervisor at the evacuation assembly area to be counted in attendance.
5. The evacuation monitor roster will consist of 6 evacuation monitors. The Production Manager/Person in Charge will act as evacuation monitor if the monitor for that area is absent.

ADDENDUM C
EVACUATION MONITOR AREA DESCRIPTIONS

MONITOR # 1.

Start by fire door back of Range 1 checking Alleyway, Rescreener, Dumpster, Warehouse 2nd floor, Boiler Room, Compressor Room, Warehouse, Production Office, QC Areas, Second Floor Office Area, By Post Finish walking through all these Areas looking for people or incident and exit the building from new Dock area.

MONITOR #2

Start at aisle way between Range 1 & Warehouse, Aisleway between 1 & 2, Flockroom #1 & left of area, front of Range 2, #2 Flockroom, Check Aisleway between range 2&3, Flockroom #3, Front of Range 3 & Precoater, Aisleway between Range 3 and Precoater, Back end of Range 3 & Precoater, Aisle between Precoater & Range 4, Alleyway to Range 4 Flockroom & Range 4 Flockroom, Check front end of Range 4, Mens & Ladies rooms by Employee Entrance. *EXIT BUILDING THROUGH EMPLOYEE ENTRANCE.*

MONITOR #3

Start at Alleyway between Ranges 4&5, Back end of Range 5, aisleway between Ranges 4 & 5, Back end of Range 4, Back end of Range 5, Flock room #5, Front end of Range 5, Maintenance Area, Storage above Maintenance Area, Engineering, Bill Turners Office, Cafeteria, Smoking Room, Shipping Offices(both), Sampler Room, Front offices & Exit through front Entrance.

MONITOR #4

Check front offices, restrooms and conference room. Take sign in sheet and clipboard to turn into Coordinator. Exit through front entrance.

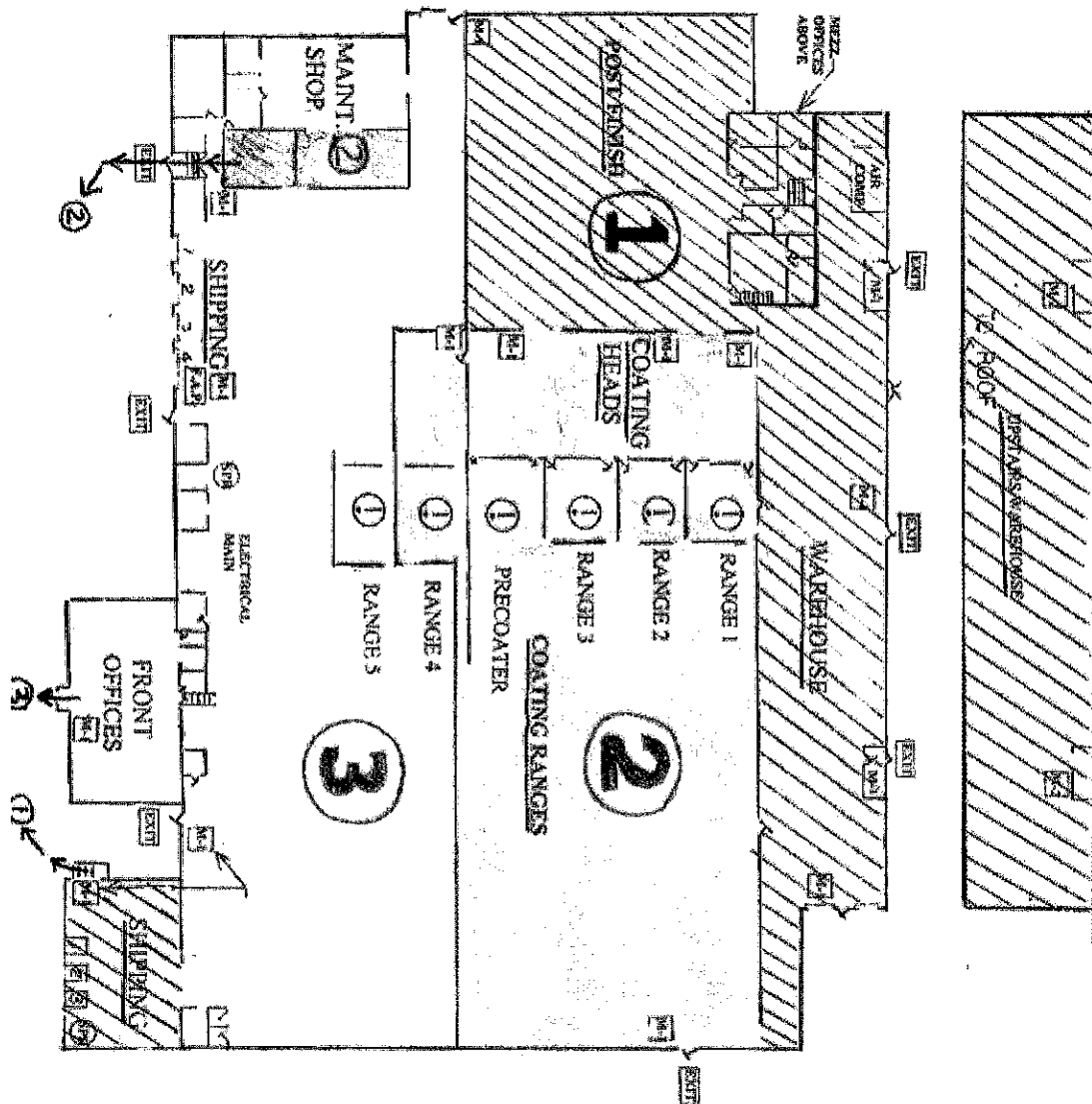
MONITOR A

Start in the Kettle area, Baghouse, Dye room, Locker room, Chemical storage area, Back warehouse, Sample dryer, Sample cutter, Offices and Labs, down Scholl's stairs. Extracting, Dryer 4, Dryer 3, Dryer 2, Range 1, Back hall, Offline, U room, Random, Random office. Exit through random exit door.

MONITOR B

Start in the maintenance shop, shipping, D kettle, 3 Wemco, Sharples, Range 7, Production office, Lab, Bathrooms, Range 5, Range 3, Range 4, Range 7 oven room, Range 6, Pierret, Knife Grinding, Break room, Bathroom, Respirator room, Warehouse. First floor offices and bathrooms, upstairs, training room, offices and bathroom, downstairs. Exit through employee entrance.

EVACUATION MONITOR ROUTES



- EXIT ----- EXIT DOOR
- MC-1 ----- 1ST FLOOR PULL STATIONS
- MC-2 ----- 2ND FLOOR PULL STATIONS
- SPRINKLER RISER
- PA-P ----- FIRE ALARM PANEL
- ① ----- FLOOR ROOM SENSORS

ADDENDUM D

INCIDENT CONTROL PERSONNEL AND PHONE LIST

FACILITY EMERGENCY COORDINATORS

Primary	Tony Caruso Cell Phone	Ext. 355
Secondary	Nick Rivard Cell Phone	Ext. 302
Secondary	Craig Sylvester Cell Phone	Ext. 327

PUBLIC RELATIONS

Rajesh Shah - Ext. 133 Hemendra Shah - Ext. 119

EMERGENCY RESPONDERS

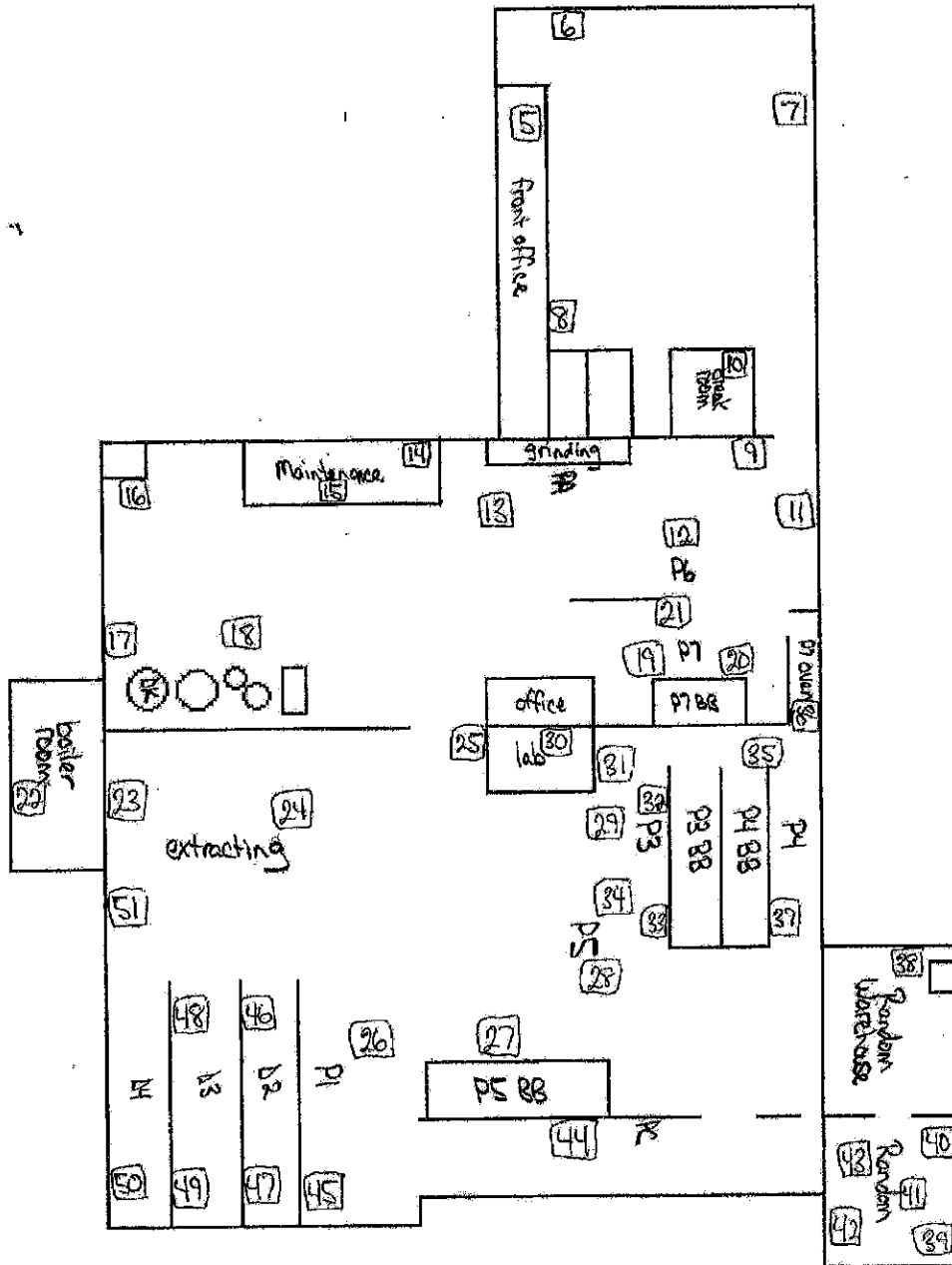
LEOMINSTER FIRE Dept.	(978) 534-6544 or 911
LEOMINSTER POLICE Dept.	(978) 534-4383 or 911
EMS - Medical Responders	(978) 534-6544 or 911

PEOPLE WHO HAVE ACCESS TO THE PREMISES DURING AN EMERGENCY:

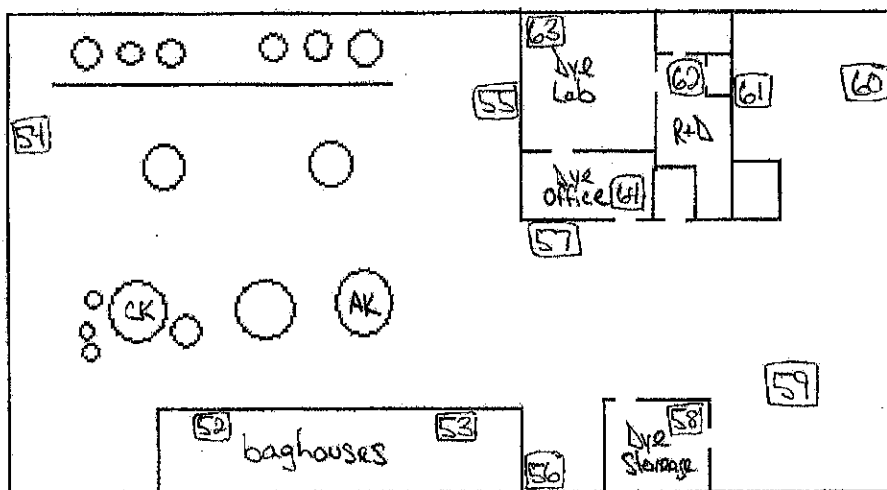
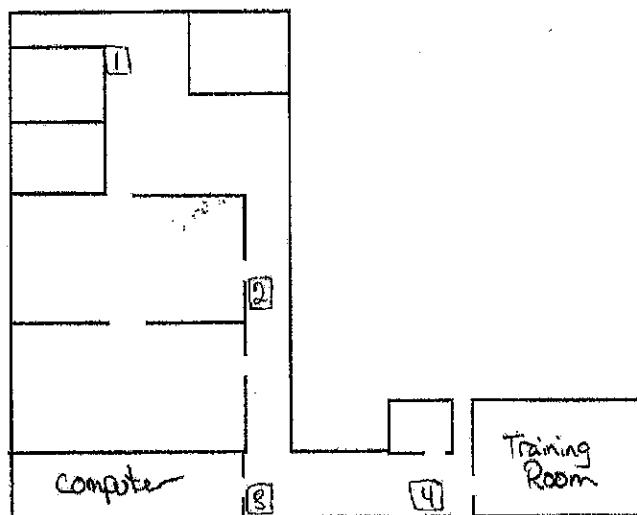
President	Hemendra Shah	Ext. 119
President Flock Division	Raj Shah	Ext. 133
Maintenance Supervisor	Nick Rivard	Ext. 302
Production Manager	Tony Caruso	Ext. 355
Production Manager	Bill Ayotte	Ext. 153
Safety	Craig Sylvester	Ext. 327

****IN THE EVENT OF A CHEMICAL SPILL/RELEASE CONTACT RAJ SHAH OR CRAIG SYLVESTER.***

ADDENDUM E Fire Extinguisher Locations

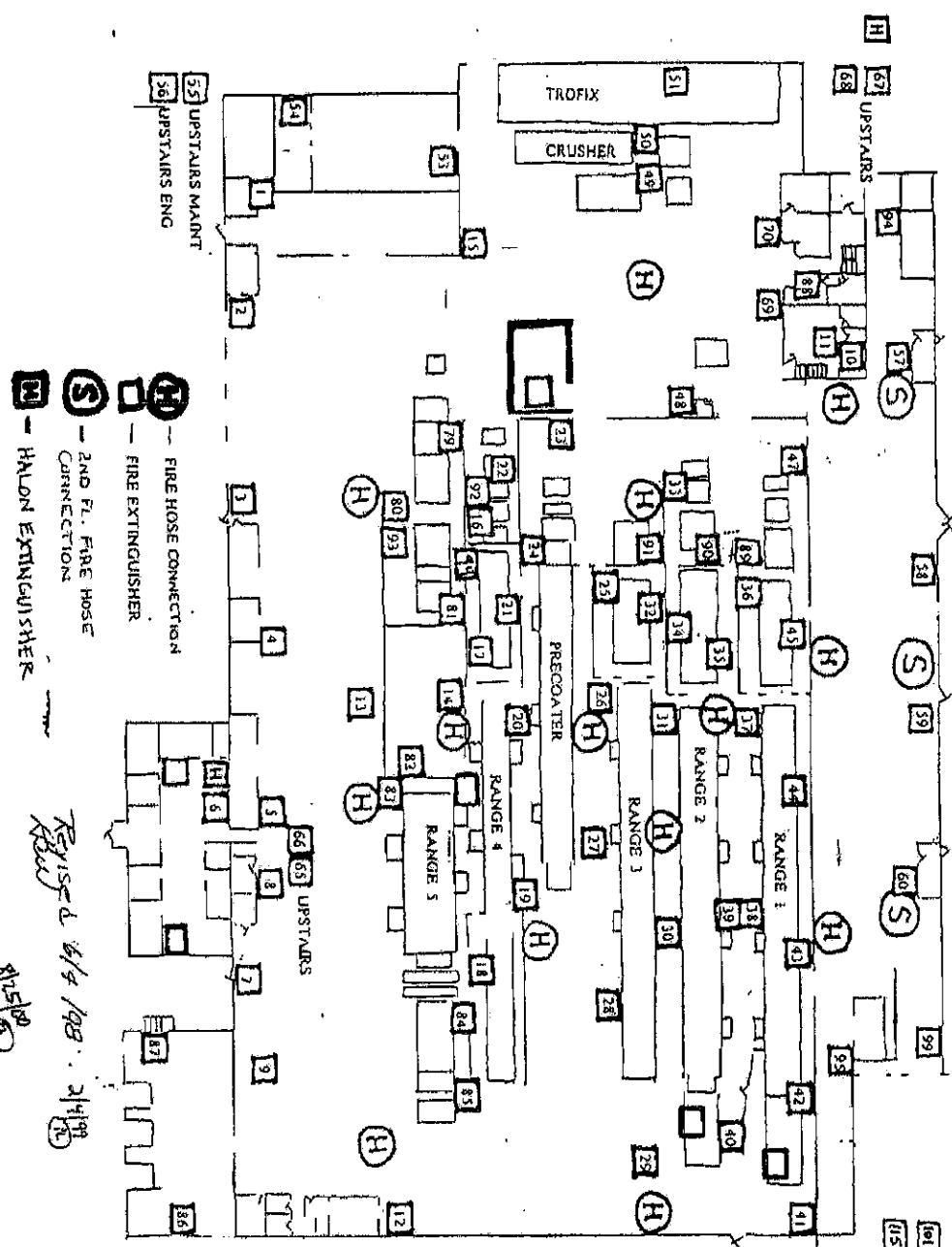


First Floor



Second Floor

FIRE HOSE/EXTINGUISHER MAPPING



- (H) FIRE HOSE CONNECTION
- (S) FIRE EXTINGUISHER
- (H) 2ND FL. FIRE HOSE CONNECTION
- (H) HALON EXTINGUISHER

Revised 6/4/98
RAC

8/15/98
10/30/98
11/1/98

- FORKLIFTS
- 101
- 102
- 103
- 114
- 115
- 117

ADDENDUM E

ADDENDUM F

MONTHLY INSPECTION OF EMERGENCY LIGHTS

- I. Emergency light stations will be tested at least once each quarter. The date will be recorded but not scheduled.

- II. Test Procedure

Each station will be tested by holding the test button in the "on" position for 30 seconds. The lights should light and the "charging" light should go on. Document a Successful lighting/charging as "O.K." or indicate what the issue for the individual light Station is.

MONTHLY INSPECTION OF FIRE EXTINGUISHERS

- I. Every portable fire extinguisher in the facility will be inspected visually each month to ensure That all extinguishers in use will function as intended if activated. The person(s) performing the Inspections will document their work on the correct paperwork.
- II. Must ensure there is no obstruction of the access to the extinguisher.
- III. Must ensure that the extinguisher is fully charged and each unit has a protective pin and intact Seal. See below for correct weight measurements for types of extinguisher. If all is good with a Extinguisher and the seal is broken, just replace the seal and classify as o.k.
- IV. Check pressure gauge to make sure pressure is in "good" or green colored area indicating it is properly charged. Weight of extinguisher need not be checked if gauge is reading o.k. for use.
- V. Document the inspection on the appropriate form(s), Notify Safety Committee Chairman if any issue arises other than a good inspection.

Inspection of weight guidelines

- a) **CO2 extinguishers** have the full wt. Stamped on the chrome valve at top. Weight of a full extinguisher should be no less than 1.5 lbs.
- b) **Badger 5** pound should be not greater than 9 lbs. But no less than 8 lbs. 4oz.
- c) **Badger 10** pound should be not greater than 17 lbs 5 oz. But no less than 16 lbs. 3oz.
- d) **Badger 30** pound should be not greater than 39 lbs 4 oz. But no less than 36 lbs.
- e) **Cartridge types** need to have the cartridge on the side unscrewed to see if the seal was broken.

ADDENDUM F

EMERGENCY LIGHTING - MONTHLY CHECKLIST

Month _____ year _____

#	LIGHT STATION LOCATION	PASS	FAIL	CHARGE	INITIALS/COMMENTS
1	2 ND Floor production office west				
2	2 nd Floor production office east				
3	Office side fire wall range 1				
4	Fire wall front of range 1				
5	Fire wall front of precoater				
6	Warehouse west end stairway				
7	Warehouse west end inside stairs				
8	Warehouse 2 nd floor west end				
9	Warehouse 2 nd floor east end				
10	Warehouse east end inside stairs				
11	Warehouse east end stairway door				
12	Emergency exit by dumpster				
13	Emergency exit back range #2				
14	Emergency exit new dock				
15	Wall by janitorial storage				
16	Wall in pedestrian aisle by samples				
17	Front office door				
18	Old dock by security office				
19	Shipping dock office wall by entrnc.				
20	Employee entrance				
21	Engineering office West side				
22	Engineering office East side				

ADDENDUM F

PAGE 1 OF 2				ADDENDUM F PORTABLE FIRE EXTINGUISHER INSPECTION MONTHLY (Coating)			
				MONTH		YEAR	
Number	Type	O.K.	Comments/Initials	Number	Type	O.K.	Comments/Initials
1	ABC			31	ABC		
2	ABC			32	CO2		
3	ABC			33	ABC		
4	ABC			34	CO2		
5	CO2			35	CO2		
6	ABC			36	CO2		
7	ABC			37	ABC		
8	CO2			38	ABC		
9	CO2			39	ABC		
10	ABC			40			
11	ABC			41	ABC		
12	ABC			42	ABC		
13	ABC			43	ABC		
14	ABC			44	ABC		
15				45	CO2		
16	CO2			46			
17	CO2			47	ABC		
18				48			
19	ABC			49	ABC		
20	ABC			50	ABC		
21	ABC			51	ABC		
22				52	CO2		
23				53	ABC		
24	CO2			54	ABC		
25	CO2			55	ABC		
26	ABC			56	ABC		
27	ABC			57	ABC		
28	ABC			58	ABC		
29				59			
30	CO2			60			

Number	Type	O.K.	Comments/Initials	Number	Type	O.K.	Comments/Initials
60	ABC			91			
61	ABC			92	CO2		
62	ABC			93	CO2		
63	ABC			94	CO2		
64	ABC			95	ABC		
65	ABC			96	ABC		
66	ABC			97			
67	ABC			98			
68	ABC			99			
69	ABC			100			
70	ABC						
71				SPARES			
72				01	ABC		
73				02	ABC		
74				03			
75				04			
76				05	ABC		
78				06	ABC		
79	CO2			07			
80	CO2			08	CO2		
81	CO2			09			
82				010	CO2		
83	ABC			011			
84	CO2			012	CO2		
85				013	CO2		
86	ABC			014	ABC		
87				015			
88	ABC			016			
89	CO2			017			
90				018			

ADDENDUM F
PORTABLE FIRE EXTINGUISHER INSPECTION
MONTHLY (Flock)

				MONTH		YEAR	
Number	Type	O.K.	Comments/Initials	Number	Type	O.K.	Comments/Initials
1	ABC			33	ABC		
2	ABC			34	ABC		
3	H			35	ABC		
4	ABC			36	ABC		
5	ABC			37	ABC		
6	ABC			38	ABC		
7	ABC			39	ABC		
8	ABC			40	W		
9	ABC			41	W		
10	ABC			42	ABC		
11	ABC			43	ABC		
12	ABC			44	ABC		
13	ABC			45	ABC		
14	CO2			46	ABC		
15	ABC			47	ABC		
16	ABC			48	ABC		
17	ABC			49	ABC		
18	ABC			50	ABC		
19	ABC			51	ABC		
20	ABC			52	ABC		
21	ABC			53	ABC		
22	ABC			54	ABC		
23	ABC			55	ABC		
24	ABC			56	ABC		
25	ABC			57	ABC		
26	ABC			58	ABC		
27	ABC			59	ABC		
28	ABC			60	ABC		
29	ABC			61	ABC		
30	ABC			62	ABC		
31	ABC			63	ABC		
32	ABC			64	ABC		

ADDENDUM G
EVACUATION ASSESMENT FORM

Date: _____

Emergency Coordinator: _____

Describe conditions or incident leading up to evacuation, include area and pertinent
Personnel involved:

Did all personnel leave the facility in a timely and orderly manner?

Were there any injuries sustained to any employee, visitor, guest or vendor as a result of
evacuating?

Did all fire alarm and emergency alarm equipment function properly? **Y or N**, comment on
this:

List issues that need to be resolved in order to make evacuations safer, more orderly and
effective:

_____: Signature of Author

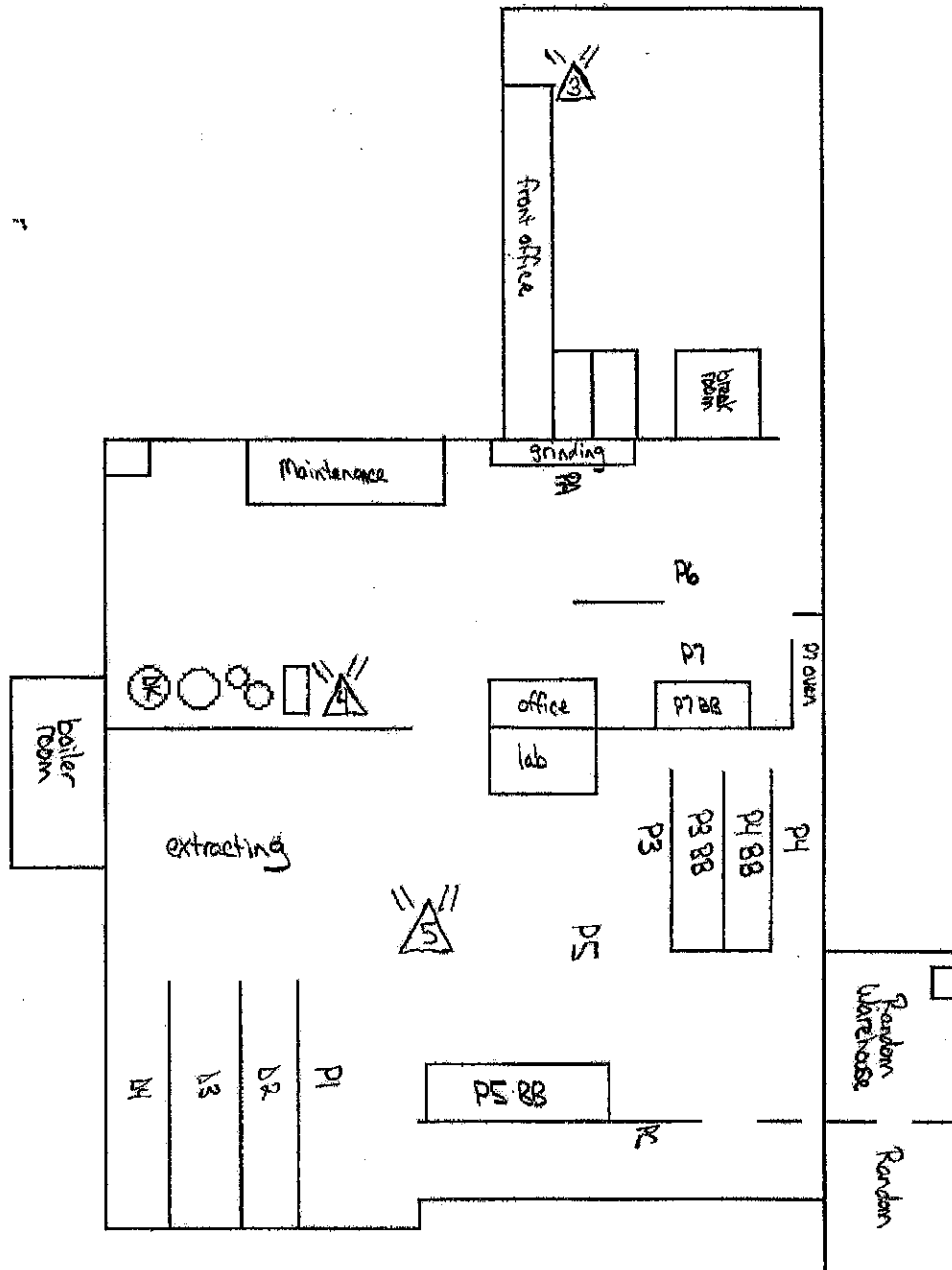
ADDENDUM H
EMERGENCY EYE WASH STATION
 INSPECTIONS AND DOCUMENTATION

1. **PROCEDURE:** Once every month the emergency eye wash stations are inspected to ensure their working condition should they need to be used in an emergency. The Security vendor is responsible for the actual inspection and its documentation. The Environmental Health and Safety director is responsible for the seeing that the implementation of the plan is carried out. It is a simple inspection that ensures the following:
 - a) That all 9 emergency eye wash stations are cleared of debris that would impede their use during an emergency situation.
 - b) Each emergency eye wash station is clearly marked as such, and is kept in relatively clean condition.
 - c) The flow of water is forceful enough and continuous for use in flooding a contaminated eye in emergency situations at each station.
 - d) The water is free from rust and other contaminants to the best of the company's knowledge at each station.

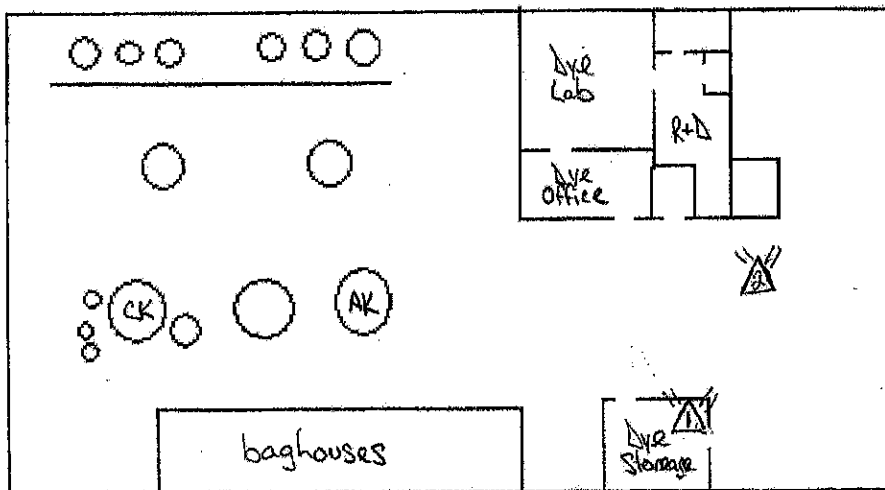
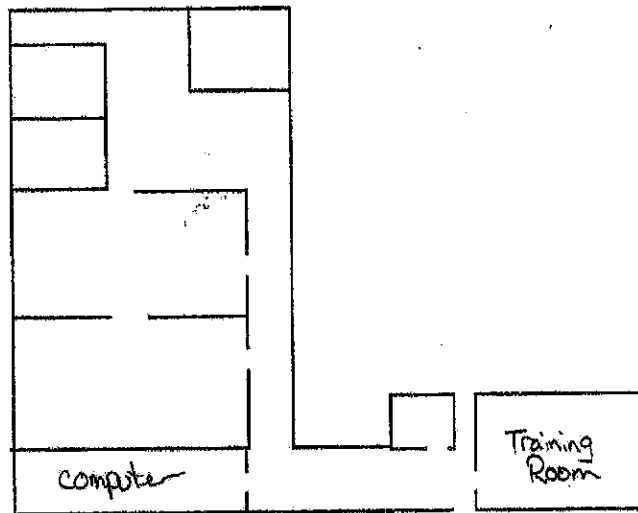
Station #	Clear of Debris?	Water Flow?	Comments	Initials	Date
			COATING SIDE		
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
			FLOCK SIDE		
1					
2					
3					
4					
5					

ADDENDUM H

EYEWASH STATIONS

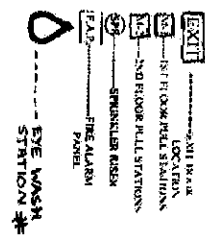


First Floor "Δ" = Eyewash/Shower



Second Floor Δ = Eyewash/Shower

EMERGENCY EYEWASH STATION LOCATIONS

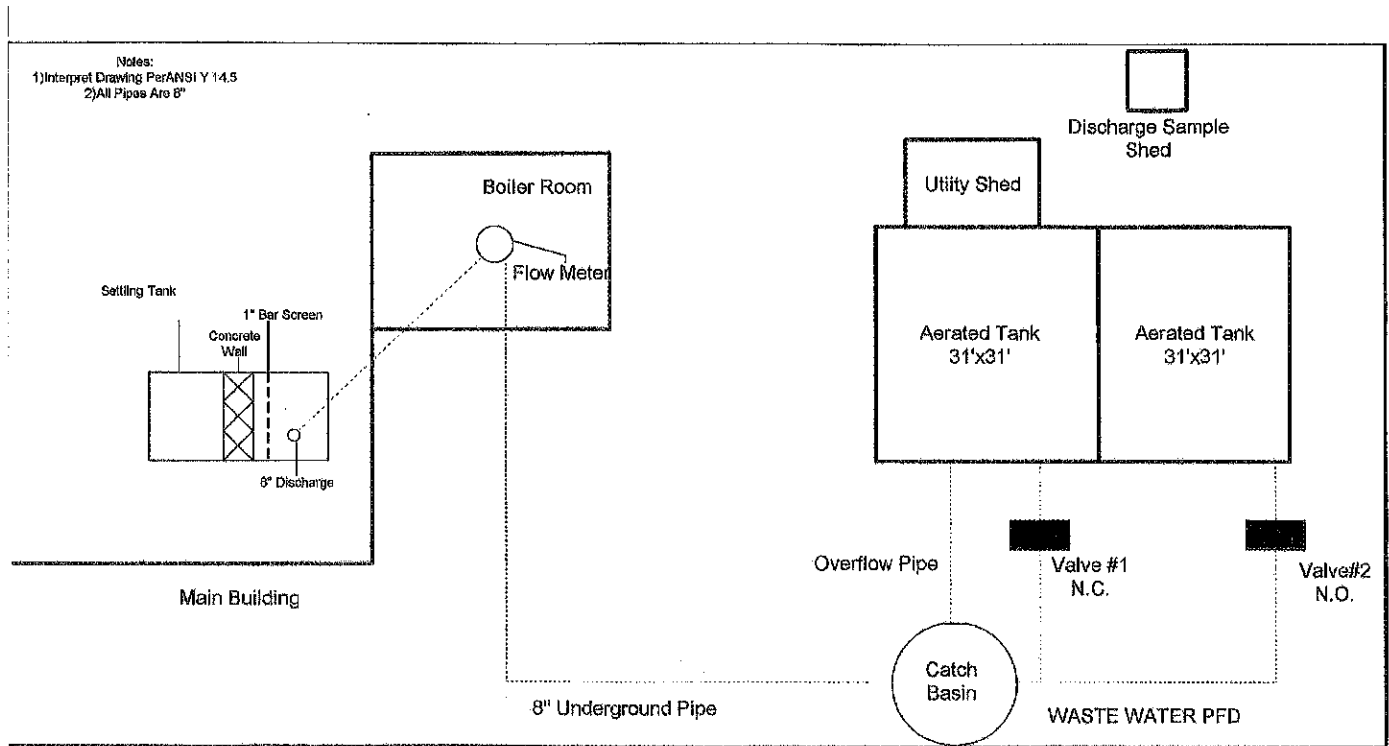


EVACUATION
ASSEMBLY
AREA

SPECTRO COATING CORP.
SCOTT DRIVE
LEOMINSTER, MASS

DISCHARGE AND SLUG CONTROL PLAN

Map



For a list of Hazardous Materials stored at the facility please reference Hazardous Communication Plan

SLUG CONTROL PLAN

PURPOSE

The purpose of this plan is to provide detailed instructions for slug prevention and control. The emergency contacts are:

Craig Sylvester
Safety

WORK PHONE: (978) 534-7327
EMERGENCY PHONE: (508) 498-2538

Nick Rivard
Maintenance Teamleader

WORK PHONE: (978) 534-7302
EMERGENCY PHONE: (508) 479-2611

Tony Caruso
Plant Manager

WORK PHONE: (978) 534-7355
EMERGENCY PHONE: (978) 618-9820

FACILITY DESCRIPTION

Spectro Coating is a textile manufacturer. The facility operates one shift per day, Monday - Friday, from 4:45 a.m. to 4:45 p.m. There are approximately 60 employees.

Sources of waste water from the flock cutting, coloration and coating operation includes rinse water and spent process baths. These waste waters are filtered to prevent solids such as fiber fragments, lose flocks etc. from entering into an outside pit. The pit is where the waste water is neutralized with Soda Ash before discharging into the sewer main. The average waste water generated is approximately 50,000 gallons per day and is being neutralized to a pH of between 6 - 8 by Soda Ash before discharging into the city sewer system.

CHEMICAL AND MATERIAL INVENTORY

CHEMICAL	LOCATION	MAXIMUM VOLUME	CONTAINER TYPE	CONTAINER VOLUME
Acetic Acid 56%	Drug Room	250 gal.	Drum	55 gal.

REPORTABLE MATERIAL DATA

The above data is a list of chemicals present in large quantities. It includes all substances that are listed or have components listed as hazardous materials and are present at large quantities.

SLUG PREVENTION

All drums are to be marked with a hazardous waste label and must be sealed at all times when not being filled or dispensed from. Drums put up in the dispensing rack are to be fitted with approved faucets and pressure relief devices. Drip cans are to be kept under faucets at all times. Neutralization pit is monitored 24 hours a day via automated pH controller. Any time the pH is outside the range, an alarm will be activated until a correction is made. The pit is also sampled manually twice a day, once in the morning and once in the afternoon. The pH is recorded in a log book and any deviations from the standard will cause the technician to alarm the production manager and take action.

SPILL CONTAINMENT

The first concern is to stop the spill and to confine the leakage. The spilled material must not be allowed to reach the floor drains which are linked directly to city sewage. Inert absorbent material, rags, paper towels and such can be all used to sop up such a spill or dike it away from the sewer or open ground. Do not use iron or any item that could spark a flammable material while cleaning up. If solvent odor is strong, clear the area of all but the clean up crew (who must wear respirators). Neoprene gloves and boots will have to be used by the clean up crew. Contaminated earth must be up and disposed in drums. Large spills will require separate disposal drum and extensive clean up. If a spill results in the material reaching the sewer system, stop the municipal drain and notify the appropriate authorities.

EMERGENCY RESPONSE PROCEDURES

Any employee discovering the release of any toxic or potentially hazardous materials that is not readily controlled must activate the emergency alarm and notify an emergency coordinator.

In the event of any releases of potentially toxic or hazardous materials necessitating the evacuation, the emergency coordinator will assess the situation and notify all appropriate agencies.

In case of fire or explosion, the local fire department should be contacted to obtain assistance.

SLUG REPORTING PROCEDURES

After any reportable incident, a member of an emergency coordinators group should notify the EPA Regional Administrator and any appropriate State and local agencies that all appropriate follow up actions have been implemented. This and other needed reports shall be processed within five days of the incident.

TRAINING

All personnel involved in manufacturing and clean up activities will receive instruction in the proper handling and disposal of chemicals and cleanup materials in order to keep regulated materials out of industrial waste water. New employees will be trained in these procedures immediately. All personnel working in these activities must be familiar with this plan and must follow the procedure established to eliminate regulated materials from entering the waste water system.

Training consists of classroom instructions which reviews the following:

1. The chemicals known to be used at the plant and areas in which they are used.
2. The location of spill control station and the drain with emphasis upon the location of pre-treatment system.
3. The Slug Control Plan and the proper procedures for handling and disposal of hazardous materials.

3.4 EMERGENCY MANAGEMENT FOR ACCIDENTAL DISCHARGE

In the event of a chemical spill, which enters the sewer system, we will immediately notify Veolia Water, who operates the Leominster Waste Water Treatment Plant.

We should identify the chemical discharged, the quantity and give any other pertinent information such as: a direct discharge from coating or a gradual discharge from our settling pit.

CALL THE PLANT	978-537 - 5720
WEEK DAYS BETWEEN	6AM - 6PM
WEEKENDS & HOLIDAYS	8AM - 4PM

**DURING OTHER HOURS OR IN THE EVENT OF NO ANSWER:
CALL: ROBERT CHALIFOUX AT: 978-537-5720**

IF NO ANSWER LEAVE A MESSAGE ON THE MACHINE!

3.4.1 RED DYE WASTE WATER CONTROL

Claremont writes a master schedule weekly. We schedule red dyed colors together throughout the work week so colored waste water does not turn red. This is controlled by the Dyehouse Manager.

Two grab samples are taken by the Claremont lab on a daily basis to review the color and the pH. Any drifting of color to red is reported to the Dyehouse/ Lab Manager and the schedule is adjusted accordingly. In the Dyehouse/ Lab Managers absence the Operations Manager takes control.

3.4.2 REPORTING REQUIREMENTS

EOS must be notified prior to the introduction of any new waste water pollutants or any substantial change in volume or characteristics of the waste water being discharged from our plant. We must also provide this information in writing within thirty (30) days of such introduction.

Claremont must also submit, within thirty (30) days of the end of the quarter, a monitoring report that tabulates the pH measurement (for that quarter) and pollutant concentrations measured in the 24 hour composite and grab samples collected during that monthly and quarterly sampling period.

All the above reports must be submitted to:

Veolia Water/Leominster WWTP
436 Mechanic Street
Leominster, MA 01453
(978) 537-5720
Attention: Mr. Robert Chalifoux

EMERGENCY SERVICES NUMBERS

911

FIRE / AMBULANCE: 978-534-7541

City of Leominster
19 Church Street

POLICE: 978-534-4383

City of Leominster
29 Church Street

HOSPITAL: 978-537-4811

Leominster Hospital
Hospital Road
Leominster, MA 01453

SPILL RESPONSE: 800-645-8265

Clean Harbors, Inc.
South Boston Field Service
530 East First Street
South Boston, MA 02127

EOS: 978-537-5720

Veolia Water/Leominster WWTP
436 Mechanic Street
Leominster, MA 01453
Attention: Mr. Robert Chalifoux, Operations managers

Attachment E

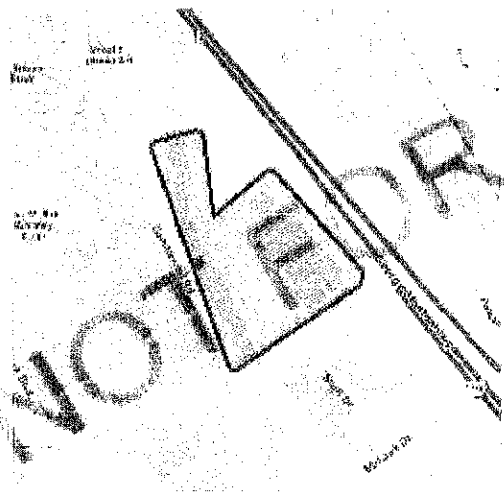
IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Worcester County, Massachusetts



Local office

New England Ecological Services Field Office

☎ (603) 223-2541

📠 (603) 223-0104

70 Commercial Street, Suite 300

Concord, NH 03301-5094

<http://www.fws.gov/newengland>

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME

STATUS

Northern Long-eared Bat *Myotis septentrionalis*

Threatened

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/9045>

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

Bald Eagle *Haliaeetus leucocephalus*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Breeds Oct 15 to Aug 31

Bobolink *Dolichonyx oryzivorus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 20 to Jul 31

Hudsonian Godwit *Limosa haemastica*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

Lesser Yellowlegs *Tringa flavipes*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9679>

Breeds elsewhere

Prairie Warbler *Dendroica discolor*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 1 to Jul 31

Red-headed Woodpecker *Melanerpes erythrocephalus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Sep 10

Ruddy Turnstone *Arenaria interpres morinella*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Rusty Blackbird *Euphagus carolinus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Semipalmated Sandpiper *Calidris pusilla*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Short-billed Dowitcher *Limnodromus griseus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9480>

Wood Thrush *Hylocichla mustelina*

Breeds May 10 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

- The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season ()

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

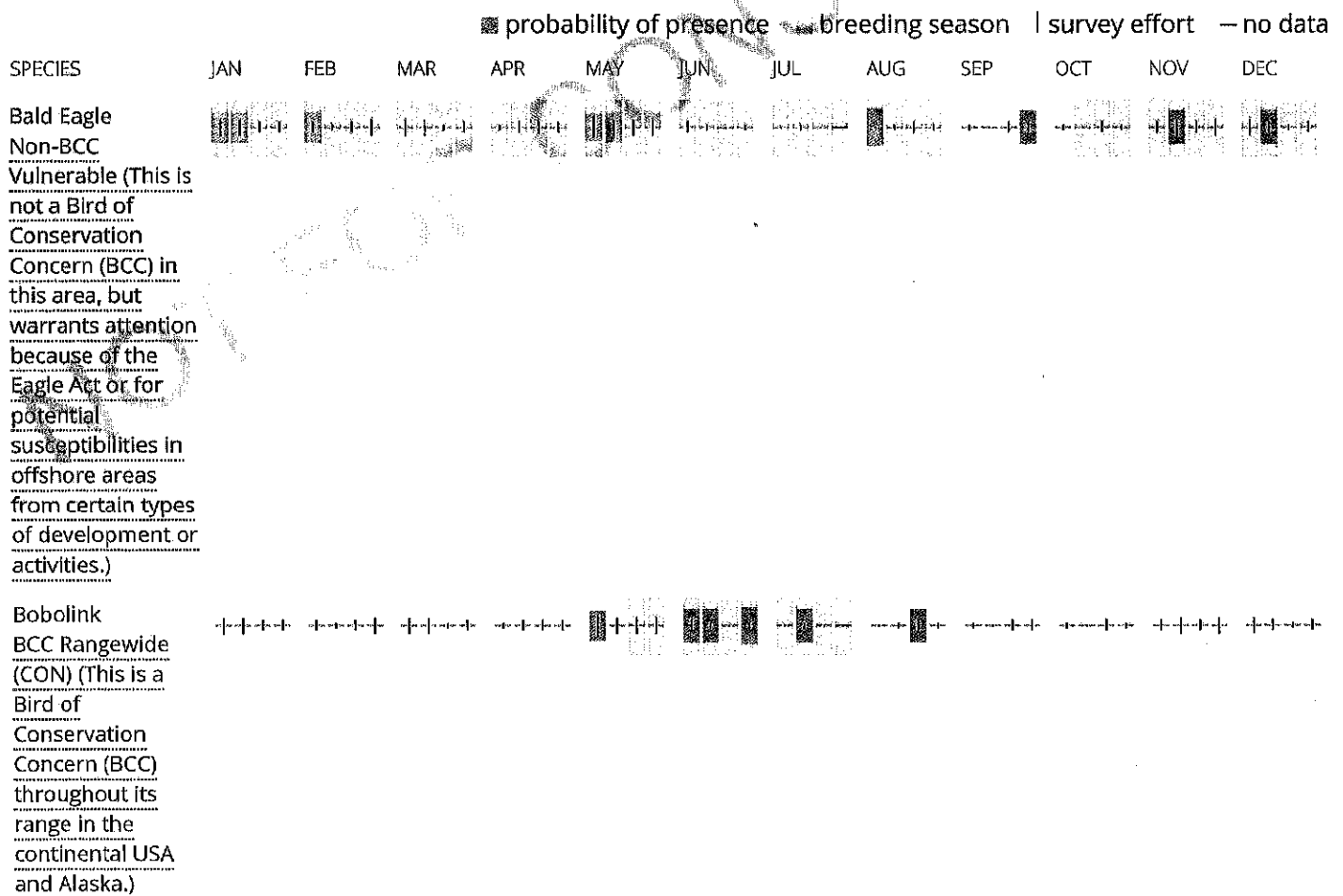
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

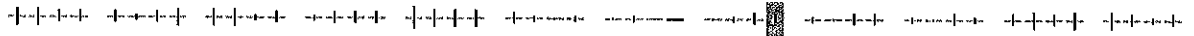
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



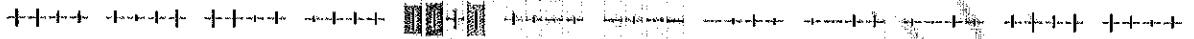
Hudsonian Godwit
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



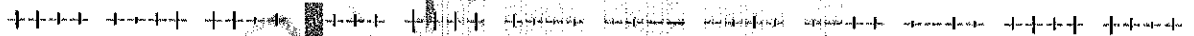
Lesser Yellowlegs
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



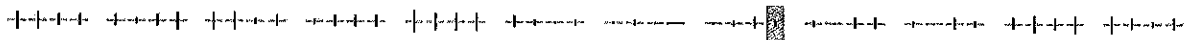
Prairie Warbler
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



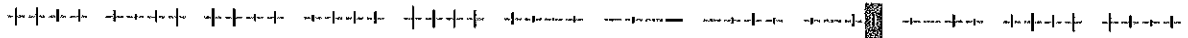
Red-headed
Woodpecker
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



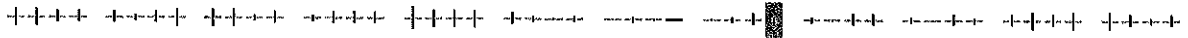
Ruddy Turnstone
BCC - BCR (This is a
Bird of
Conservation
Concern (BCC) only
in particular Bird
Conservation
Regions (BCRs) in
the continental
USA)



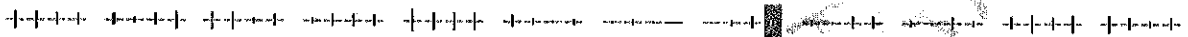
Rusty Blackbird
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



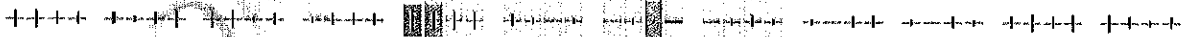
Semipalmated
Sandpiper
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Short-billed
Dowitcher
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Wood Thrush
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

RIVERINE

R2UBH

A full description for each wetland code can be found at the National Wetlands Inventory website.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Attachment F

<https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp>