

RIVER BEND STATION LPDES PERMIT LA0042731

STORMWATER POLLUTION PREVENTION PLAN



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Effective Date: July 24, 2013

DATE	Revision	CHANGE
7/24/2013	3	Added Station Blackout Diesel Generator Fuel Tank #1 (old) to Table 1 (page 19)
7/24/2013	3	Added Backup Air Compressor Diesel Generator Fuel Tank "C4" to Table 1 (page 19)

TABLE OF CONTENTS

<u>Section</u>	<u>Description</u>	<u>Page</u>
1.0	Introduction	5
2.0	Permitted Outfalls	5
3.0	Annual Inspection	7
4.0	Potential Pollutant Sources	8
4.1	Site Map	8
4.2	Reportable Leaks or Spills	9
4.3	Potential Pollutant Sources	9
5.0	Potential Equipment Failures	14
6.0	Inspection Reports	15
7.0	Best Management Practices	15
7.1	Drainage Systems	15
7.2	Spill Cleanups	15
7.3	Storage Practices	16
7.4	Recycle/Disposal Practices	16
7.5	Secondary Containment Structures	16
7.6	Diked Areas	16
7.7	Inspections	17
7.8	Waste Management Practices	17
8.0	Amendments to SWPPP	18
Table 1	Petroleum Related Potential Pollutant Sources	19
Table 2	Chemical Related Potential Pollutant Sources	21
Table 3	Miscellaneous Potential Pollutant Sources	22
Figure 1	Stormwater Drainage Map	23
Figure 2	Miscellaneous Potential Pollutant Sources	24
Attachment I	Annual Stormwater Inspection Report (Typical)	25
Attachment II	Inspection Reports	27
Attachment III	Miscellaneous Addendums	28

Cross Index Reference

Topic	Permit Reference	SWPPP Section
Facility Stormwater Runoff	Part II, Section S.2	2.0
SWPPP Implementation	Part II, Section S.3	1.0
Inspections	Part II, Section S.4.a	3.0
Potential Pollutant Sources	Part II, Section S.4.b	4.0
Potential Equipment Failures	Part II, Section S.4.c	5.0
Record Retention	Part II, Section S.4.d	6.1
Annual Inspection Summary Reports	Part II, Section S.4.e	6.2
SWPPP Regulatory Requests	Part II, Section S.4.f	6.3
Drainage Systems	Part II, Section S.5.a	7.1
Spill Cleanups	Part II, Section S.5.b	7.2
Storage Practices	Part II, Section S.5.c	7.3
Recycle/Disposal Practices	Part II, Section S.5.d	7.4
Secondary Containment Structures	Part II, Section S.5.e	7.5
Diked Areas	Part II, Section S.5.f	7.6
Inspections	Part II, Section S.5.g	7.7
Waste Management Practices	Part II, Section S.5.h	7.8
Facility Changes	Part II, Section S.5.i	8.1.A
SWPPP Ineffectiveness	Part II, Section S.5.j	8.1.B

1.0 INTRODUCTION [Section S.3 of Part II]

1.1 The Stormwater Pollution Prevention Plan (SWPPP) was prepared in accordance with the requirements specified in Section S.3 of Part II of River Bend Station (RBS) LPDES Permit LA0042731 for stormwater discharges associated with industrial activity at the RBS facility.

1.2 The objectives of the SWPPP are the following:

- Identify pollution sources which may reasonably be expected to affect the quality of stormwater discharges from the facility.
- Describe and ensure the implementation of best management practices to reduce pollutants in stormwater discharges.
- Ensure compliance with the terms of RBS LPDES Permit LA0042731.

2.0 PERMITTED OUTFALLS [Section S.2 of Part II]

2.1 All runoff leaving developed areas of the site flows into permitted stormwater outfalls where it is sampled quarterly in accordance with RBS LPDES Permit LA0042731.

2.2 Drainage areas contributing to each stormwater outfall are as follows:

- Outfall 002 - stormwater runoff from the industrial materials storage area, the Low Level Waste Storage Building area and the sewage treatment plant area.
- Outfall 003 - stormwater runoff from the Reactor Building area, the Turbine Building area, the Services Building area and the clarifier areas. Stormwater runoff from the Main Transformer Yard and the Auxiliary Transformer Yard is treated in two oily water separators, one for each yard prior to discharge via Outfall 003.
- Outfall 004 - stormwater runoff from the west and north parts of the facility, consisting of small ditches from office areas, warehouse areas, materials storage areas and equipment/vehicle maintenance areas.
- Outfall 005 stormwater runoff from cooling tower yard.

2.3 Although Outfalls 002, 003, 004 and 005 are designated for stormwater, these outfalls also receive the following wastewaters:

- Outfall 002 – air conditioning condensate, potable water, and previously monitoring hydrostatic test wastewater; during maintenance activities, previously monitored effluent from Internal Outfall 201 (Treated Sanitary Wastewater).
- Outfall 003 – air conditioning condensate, de minimis quantities of cooling tower drift/mist, previously monitored hydrostatic wastewater, maintenance wastewaters and low volume wastewaters. For a description of the maintenance and low volume wastewaters, refer to RBS LPDES Permit LA0042731.
- Outfall 004 – air conditioning condensate, potable water, maintenance wastewaters, previously monitored hydrostatic test wastewater, and previously monitored effluent from Internal Outfall 104 (Vehicle Wash Wastewater). For a description of the maintenance wastewaters, refer to RBS LPDES Permit LA0042731.
- Outfall 005 – air conditioning condensate, previously monitored hydrostatic test wastewater, and de minimis quantities of cooling tower drift/mist.

2.4 There are thirteen permitted LPDES outfalls at the RBS facility as shown below:

- Outfall 001 (Cooling Tower Blowdown)
- Outfall 002 (Stormwater)
- Outfall 003 (Stormwater)
- Outfall 004(Stormwater)
- Outfall 005 (Stormwater)
- Outfall 006 (Clarifier Underflow)
- Outfall 007 (Hydrostatic Testing)
- Internal Outfall 101 (Low Volume Wastewater – Low-Level Radioactive)
- Internal Outfall 104 (Vehicle Wash Wastewater)

- Internal Outfall 201 (Treated Sanitary Wastewater)
- Internal Outfall 301 (Metal Cleaning Wastewater)
- Internal Outfall 401 (Low Volume Wastewater)
- Internal Outfall 501 (Low Volume Wastewater)
- Internal Outfall 601 (Low Volume Wastewater)

3.0 ANNUAL INSPECTION [Section S.4.a of Part II]

3.1 Chemistry is to annually perform the following:

- Inspect areas where industrial materials or activities are exposed to stormwater and areas where spills and leaks have occurred in the past three years (if applicable).
- Evaluate whether measures to reduce pollutant loadings identified in this SWPPP are adequate and have been properly implemented in accordance with the terms of the permit or whether additional control measures are needed.

3.2 Chemistry is to specifically look for the following:

- Industrial materials, residue or trash on the ground that could contaminate or be washed away in stormwater.
- Leaks or spills from industrial equipment, drums, barrels, tanks or similar containers.
- Offsite tracking of industrial materials or sediment where vehicles enter or exit the site.
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas.
- Evidence of or potential for pollutants entering the drainage system.
- Stormwater best management practices (BMPs) identified in the Plan are operating correctly.

- BMPs are effective in preventing significant impacts to receiving waters where discharge locations or points are accessible. Where discharge locations are inaccessible, nearby downstream locations are inspected, if possible.

3.3 Chemistry is to prepare a summary report of the inspection results utilizing the information and inspection form shown in Attachment 1 (Annual Stormwater Inspection Report) or similar.

4.0 POTENTIAL POLLUTANT SOURCES [Section S.4.b of Part II]

4.1 Site Map

- A. Figure 1 (Stormwater Drainage Map) of this SWPPP identifies stormwater drainage pathways.
- B. As allowed in Section S.3 of Part II of the RBS LPDES Permit LA0042731, the site is incorporating, by reference, the following portions of the RBS SPCC Plan and RBS Procedure RBNP-035 (Hazardous Materials Emergency Response Plan) to satisfy the site map requirement that identifies areas where stormwater may contact potential pollutants or substances that can cause pollution:

RBS SPCC Plan

- Figures 3 (Oil and Gasoline Storage Locations) and 4 (Transformer Locations) include potential pollutant sources related to petroleum products. In addition, Tables 1 (Oil and Gasoline Storage Locations) and 2 (Transformer Locations) includes the type of petroleum product, location, quantity and predicted direction of flow. For quick reference, sources that come in contact with stormwater are shown in Table 1 (Petroleum Related Potential Pollutant Sources) of this SWPPP.

RBS Procedure RBNP-035 (Hazardous Materials Emergency Response Plan)

- Attachment 2 identifies potential pollutant sources related to oil and chemical products. In addition, Attachment 2 identifies the type of chemical product, location, quantity and predicted direction of flow. For quick

reference, chemical sources that come in contact with stormwater are shown in Table 2 (Chemical Related Potential Pollutant Sources) of this SWPPP. Changes to RBNP-035 will not necessarily invoke a revision to the SPCC or SWPPP. Changes to the list in Table 2 of this SWPPP will not necessarily invoke a revision to RBNP-035.

- C. Other sources that come in contact with stormwater are listed in Table 3 (Miscellaneous Potential Pollutant Sources) and Figure 2 (Miscellaneous Potential Pollutant Sources) of this SWPPP.

4.2 **Reportable Leaks or Spills**

- Any location where reportable quantities of leaks or spills are documented per RBNP-035 and included in the annual review section associated with Attachment 1 of the Plan would be updated to include such information as specified in Section S.4.b of Part II of RBS LPDES Permit LA0042731.

4.3 **Potential Pollutant Sources**

A. **Chemical Storage Tanks & Tote Bins**

- Chemical storage tanks and tote bins are within secondary containment structures as shown in Attachment 2 (Potential Spill Sources) of RBS Procedure RBNP-035 (Hazardous Materials Emergency Response Plan). In addition, unloading areas for tanks are equipped with secondary containment measures. Secondary containment drainage is inspected prior to discharge to ensure water quality standards are met as discussed in the Section 7.6 to this SWPPP. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are identified in Table 2 (Chemical Related Potential Pollutant Sources) of this SWPPP.

B. Aboveground Oil & Gasoline Storage Tanks & Containers

- With the exception of the Field Administration Diesel Generator Fuel Tank, all oil and gasoline storage tanks and containers are either within secondary containment structures and/or within enclosed buildings as shown in Table 1 (Oil and Gasoline Storage Locations) of the RBS SPCC Plan. Secondary containment drainage from these areas is inspected prior to drainage (for tanks exposed to rainfall) to ensure water quality standards are met as discussed in the Facility Drainage Section of the RBS SPCC Plan. The Field Administration Diesel Generator Fuel Tank is equipped with a diversionary curb and absorbent materials and is not exposed directly to rainfall. In addition, the Station Blackout Diesel Generator Fuel Tanks and Backup Air Compressor Diesel Generator Fuel Tanks are not exposed directly to rainfall. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are identified in Table 1 (Petroleum Related Potential Pollutant Sources) of this SWPPP.

C. Transformers

- Transformers are within secondary containment/diversionary structures as described in Table 2 (Transformer Locations) of the RBS SPCC Plan. Drainage from these secondary containment/diversionary structures either flow through an oily water separator or sump, with the exception of the two transformers at the river intake which drain to the ground. Where applicable, secondary containment drainage is inspected prior to drainage to ensure water quality standards are met as discussed in the Facility Drainage section of the RBS SPCC Plan. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are identified in Table 1 (Petroleum Related Potential Pollutant Sources) of this SWPPP.

D. Fuel Unloading Areas (Oil)

- Fuel unloading areas are identified in Table 1 (Petroleum Related Potential Pollutant Sources) of this SWPPP and are also shown in Table 1 (Oil and Gasoline Storage Locations) and Figure 3 (Oil & Gasoline Storage Locations) of the RBS SPCC Plan. Since fueling activities are associated with these areas, minor spills could occur resulting in potential stormwater runoff contaminated with petroleum hydrocarbons.
- As discussed in the RBS SPCC Plan (Section 4.2.C), spill prevention measures are taken such as properly aligning valves, establishing spill prevention measures, proper connecting and disconnecting of fill pipe, and inspections prior to departure of the truck. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are identified in Table 1 (Petroleum Related Potential Pollutant Sources) of this SWPPP.

E. Industrial Materials Storage Area

- The industrial materials storage area is identified in Figure 2 (Miscellaneous Potential Pollutant Sources) to this SWPPP. Materials stored in these areas include metal, wood and other equipment.
- Drainage from this area drains to LPDES Outfall 002 (Stormwater) where it is sampled quarterly for total organic carbon, oil & grease and pH. Pollutants of concern at this location include suspended solids and iron.
- To minimize potential stormwater contamination due to suspended solids and iron, the housekeeping practices identified in Corporate Procedure EN-MA-132 (Housekeeping/Facility and Grounds Maintenance) are implemented at these areas. In addition, this area is also periodically inspected during environmental rounds. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are identified in Table 3 (Miscellaneous Potential Pollutant Sources) of this SWPPP.

F. Laydown Area

- The laydown area is identified in Figure 2 (Miscellaneous Potential Pollutant Sources) to this SWPPP. Materials stored in these areas include metal, wood and other equipment.
- Drainage from this area drains to LPDES Outfall 004 (Stormwater) where it is sampled quarterly for total organic carbon, oil & grease and pH. Pollutants of concern at this location include suspended solids and iron.
- To minimize potential stormwater contamination due to suspended solids and iron, the housekeeping practices identified in Corporate Procedure EN-MA-132 (**Housekeeping/Facility and Grounds Maintenance**) are implemented at these areas. In addition, this area is also periodically inspected during environmental rounds. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are identified in Table 3 (Miscellaneous Potential Pollutant Sources) of this SWPPP.

G. Materials Staging Area (Scrap Metal & Wood)

- The materials staging area (scrap metal & wood) is identified in Figure 2 (Miscellaneous Potential Pollutant Sources) to this SWPPP. Materials stored in these areas include metal and wood.
- Drainage from this area drains to LPDES Outfall 004 (Stormwater) where it is sampled quarterly for total organic carbon, oil & grease and pH. Pollutants of concern at this location include suspended solids and iron.
- To minimize potential stormwater contamination due to suspended solids and iron, the housekeeping practices identified in Corporate Procedure EN-MA-132 (**Housekeeping/Facility and Grounds Maintenance**) are implemented at these areas. In addition, this area is periodically inspected during environmental rounds. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are

identified in Table 3 (Miscellaneous Potential Pollutant Sources) of this SWPPP.

H. Equipment & Vehicle Staging Area

- The equipment and vehicle staging area is identified in Figure 2 (Miscellaneous Potential Pollutant Sources) to this SWPPP. This area has been designated for staging tractors, trucks and other motorized equipment.
- Drainage from this area drains to LPDES Outfall 004 (Stormwater) where it is sampled quarterly for total organic carbon, oil & grease and pH. Pollutants of concern at this location include petroleum hydrocarbons.
- To minimize potential stormwater contamination due to petroleum hydrocarbons, the housekeeping practices identified in Corporate Procedure EN-MA-132 (**Housekeeping/Facility and Grounds Maintenance**) are implemented at these areas. In addition, this area is periodically inspected during environmental rounds. Existing best management practices at these areas to minimize contribution to pollution in stormwater runoff are identified in Table 3 (Miscellaneous Potential Pollutant Sources) of this SWPPP.

I. Herbicide Usage

- Non-general consumer herbicides are applied by a licensed contractor to fence lines and equipment pads on an as-needed basis. Material management practices designed to minimize over use of herbicides include (1) observing safety and environmental procedures when applying chemicals to areas of the facility and (2) establishing integrated herbicide management controls conducted under the supervision of a licensed applicator. These chemicals are not directly applied to water or to areas where surface water is present. Equipment used to apply herbicides is managed offsite by contract personnel.

There is low reasonable potential for storm water contamination because herbicides are only used by a licensed applicator and are not applied when a storm event is expected to occur within one hour.

J. Miscellaneous Areas

- Miscellaneous areas may be temporarily established on-site for plant outage, construction or other emergency support purposes. In the event that industrial activities are associated with these areas and involve areas not already covered by the RBS SWPPP, an addendum will be added to Attachment III of this Plan to ensure that appropriate stormwater controls are implemented.

5.0 POTENTIAL EQUIPMENT FAILURES [Section S.4.C of Part II]

5.1 There has not been any site-specific experience which would indicate a reasonable potential for equipment failure. However, the following information is being provided for purposes of this SWPPP:

- Attachment 2 (Potential Spill Sources) of to RBS Procedure RBNP-035 (Hazardous Materials Emergency Response Plan) describes the predicted direction of release and quantity of pollutants in the event of an equipment failure.
- Figure 1 of this SWPPP identifies the direction of stormwater drainage at the site. As seen in Figure 1, stormwater runoff at the site flows either to stormwater water Outfalls 002, 003, 004 or 005 where it is sampled quarterly for total organic carbon, oil & grease and pH prior to entering receiving waters.

5.2 It is unlikely that significant amounts of pollutants would reach surface waters due to the following management practices:

- As discussed in Section 4.3 above, tanks are equipped with secondary containment structures and discharge prevention practices are in place during unloading activities.

- Tanks, containers and transformers are periodically inspected for leaks or other deteriorating conditions that could result in a release in accordance with the Inspections, Tests & Records section of the RBS SPCC Plan.
- As discussed in Section 4.3 above, secondary containment drainage is inspected prior to drainage to ensure water quality standards are met.

6.0 INSPECTION REPORTS

- 6.1 Chemistry is to maintain for three years a record summarizing the results of the inspection required in Section 3.0 above and a certification statement that the facility is in compliance with the RBS SWPPP. **[Section S.4.d of Part II]**
- 6.2 Completed annual inspection summary reports (Attachment 1 of this RBS SWPPP) are to be attached to Attachment II (Inspection Reports) of this RBS SWPPP after each inspection is completed. **[Section S.4.e of Part II]**
- 6.3 RBS shall provide the Louisiana Department of Environmental Quality a copy of this SWPPP and any supporting documentation, upon request. **[Section S.4.f of Part II]**

7.0 BEST MANAGEMENT PRACTICES

7.1 Drainage Systems [Section S.5.a of Part II]

A. To minimize potential impacts on the site drainage systems, RBS is to perform the following:

- Maintain adequate roads and driveway surfaces.
- Remove debris and accumulated solids from the drainage system.
- Clean up immediately any spill by sweeping, absorbent pads or other appropriate methods.

7.2 Spill Cleanups [Section S.5.b of Part II]

A. All spills are to be cleaned up immediately in accordance with RBS Procedure RBNP-035 (Hazardous Materials Emergency Response Plan) and spill debris disposed of in accordance with NMM Procedure EN-EV-106

(Waste Management Program). Use of detergents, emulsifiers or dispersants to clean up spills is prohibited except where:

- Necessary to comply with state or federal safety regulations (i.e., requirement for non-slippery work surface).
- The cleanup practice does not result in a discharge and does not leave residues exposed to future storm events.

B. For all spills, initial cleanup is to be done by physical removal with chemical usage minimized.

7.3 **Storage Practices [Section S.5.c of Part II]**

A. RBS is to maintain all equipment, parts, dumpsters, trash bins, petroleum products, chemical solvents, detergents or other materials exposed to stormwater in a manner that prevents contamination of stormwater by pollutants.

7.4 **Recycle/Disposal Practices [Section S.5.d of Part II]**

A. RBS is to either recycle (where feasible) or contain for disposal waste fuel, lubricants, coolants, solvents or other fluids used in the repair or maintenance of vehicles or equipment.

B. Spills associated with these materials are to be cleaned up by dry means whenever possible.

7.5 **Secondary Containment Structures [Section S.5.e of Part II]**

A. Secondary containment structures for tanks exposed to rainfall at the RBS facility are impervious to contain spills and can contain the entire contents of the largest tank plus sufficient freeboard to allow for precipitation.

7.6 **Diked Areas [Section S.5.f of Part II]**

A. Through periodic visual inspections conducted in accordance with RBS Procedure OSP-0031 (Log Report – Outside Area) or routine Chemistry rounds, diked areas surrounding storage tanks exposed to rainfall (where

applicable) are maintained free of residual oil or other contaminants which could contribute pollutants to stormwater runoff.

- B. Valves on diked areas are closed when in non-operating or non-standby conditions except during periods of supervised discharge. Drain valves and any other valves permitting direct outward flow of a diked area's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or non-standby status. Drainage from diked areas is restrained by a manually operated valve to prevent a discharge from entering the facility drainage system. The valves are normally sealed closed, except when draining the secondary containment structure. The content of the secondary containment dike is inspected by facility personnel prior to draining to ensure that only oil-free water is allowed to enter the facility storm water drainage system. The drain valve is opened and resealed under direct personnel supervision. Drainage events are recorded in the log maintained by Environmental in the LPDES Weekly Sample Sheet or equivalent.

7.7 Inspections [Section S.5.g of Part II]

- A. Inspections are conducted on check valves, tanks, drains or other potential sources of pollutant releases in accordance with RBS Procedure OSP-0031 (Log Report – Outside Area).
- B. As a result of these inspections and RBS's corrective action process which is implemented through NMM Procedure EN-LI-102 (Corrective Action Process), check valves, tanks, drains or other potential sources of pollutant releases are being maintained to assure their proper operation and to prevent the discharge of pollutants.

7.8 Waste Management Practices [Section S.5.h of Part II]

- A. RBS will comply with all applicable regulations promulgated under the Louisiana Solid Waste and Resource Recovery Law and the Hazardous Waste Management Law (L.R.S. 30:2151, etc.).

- B. Management practices governed under the above regulations, with which RBS is required to comply, are captured in RBS Procedure RBNP-035 (Hazardous Materials Emergency Response Plan) and NMM Procedure EN-EV-106 (Waste Management Program).

8.0 AMENDMENTS TO SWPPP

8.1 RBS is to amend this SWPPP as follows:

- Whenever there is a change in the facility or change in the operation of the facility which materially increases the potential for the ancillary activities to result in a discharge of significant amounts of pollutants. [**Section S.5.i of Part II**]
- If the SWPPP proves to be ineffective in achieving the general objectives of preventing the release of significant amounts of pollutants to water of the state. [**Section S.5.j of Part II**]

Table 1		
Petroleum Related Potential Pollutant Sources		
Sources	SPCC Reference	Best Management Practices
Standby Diesel Generator Division I Fuel Tank Unloading Area Standby Diesel Generator Division II Fuel Tank Unloading Area HPCS Diesel Generator Division III Fuel Tank Unloading Area	Table 1 & Figure 3	Spill Prevention & Response Inspection Housekeeping Sump
Station Blackout Diesel Generator Fuel Tanks #1 and #2 & Unloading Area Field Administration Diesel Generator Fuel Tank & Unloading Area Backup Air Compressor Diesel Generator Fuel Tanks C"4" and "C6" & Unloading Area Auxiliary Diesel Fuel Tankers	Table 1 & Figure 3	Spill Prevention & Response Inspection Housekeeping
Transformer 1STX-XNS1A (East Wall of Turbine Building) Transformer 1STX-XNS1B (East Wall of Turbine Building) Transformer 1STX-XNS1C (East Wall of Turbine Building) Transformer 1RTX-XSR1C (East Wall of Turbine Building) Transformer 1RTX-XSR1E (East Wall of Turbine Building) Transformer 1MTX-XM1 (East Wall of Turbine Building) Transformer 1MTX-XM2 (East Wall of Turbine Building) Transformer 1RTX-XSR1F (Southwest of Turbine Building) Transformer 1RTX-XSR1D (Southwest of Turbine Building)	Table 2 & Figure 4	Secondary Containment Oil Water Separator Inspection
Transformer 1NJS-X2A (Cooling Tower A) Transformer 1NJS-X2B (Cooling Tower A) Transformer 1NJS-X2C (Cooling Tower C) Transformer 1NJS-X2D (Cooling Tower C) Transformer 1NJS-X2E (Cooling Tower B)	Table 2 & Figure 4	Secondary Containment Sump Inspection

<p style="text-align: center;">Table 1 Petroleum Related Potential Pollutant Sources</p>		
Sources	SPCC Reference	Best Management Practices
Transformer 1NJS-X2F(Cooling Tower B) Transformer 1NJS-X2G (Cooling Tower D) Transformer 1NJS-X2H (Cooling Tower D) Transformer 1NJS-X3A (Clarifiers) Transformer 1NJS-X3B (Clarifiers) Transformer 1NJS-X3C (Service Water Area) Transformer 1NJS-X3D (Service Water Area) Transformer 1NJS-X4A(Service Water Area) Transformer 1NJS-X4B(Service Water Area) Transformer 1RCS-X1A (West Wall of Fuel Building) Transformer 1RCS-X1B (West Wall of Fuel Building) Transformer 1STX-XS2A (Circulating Water House) Transformer 1STX-XS2B(Circulating Water House)	Table 2 & Figure 4	Secondary Containment Sump Inspection
Transformer 1STX-XS3A (River Intake) Transformer 1STX-XS3B (River Intake)	Table 2 & Figure 4	Secondary Containment Inspection
Transformer 1STX-XS5A (Service Water Area) Transformer 1STX-XS5B (Service Water Area)	Table 2 & Figure 4	Secondary Containment Sump -Inspection
Spare Transformer Moloney 2059031 (Laydown Area) Spare Transformer 1RTX-XSR1A (Laydown Area) Spare Transformer ABB HB09707-01 (Laydown Area) Spare Transformer Westinghouse VCS6505 (Laydown Area)	Table 2 & Figure 4	Secondary Containment Inspection

Table 2
Chemical Related Potential Pollutant Sources

Sources	RBNP-035 Reference	Best Management Practices
Sodium Hypochlorite Tanks & Unloading Areas Sulfuric Acid Tanks & Unloading Areas Polymer Tank Unloading Area (Nalco 2030) Sodium Bromide Tank & Unloading Area (Nalco 1318) Defoamer Tank & Unloading Area (Nalco 7468) BZT Tank & Unloading Area (Nalco 3DT-198) Dispersant Tank & Unloading Area (Nalco 3DT-190) Alkylphosphoric Acid Tank & Unloading Area (Nalco 3DT-177) Ammonium Bisulfite Tank & Unloading Area (Nalco 7905) Zinc Chloride Tote Bins (Nalco 7384) Sodium Tolytriazole Tote Bins (Nalco 3DT-199) Sodium Molybdate Tote Bins (Nalco 7357) Sodium Nitrite Tote Bins (Nalco 73310) Sodium Hydroxide Tote Bins (25% Caustic) Biodispersant Totes (Nalco 7348) Tower Brom Tote Bins (Nalco Tower Brom 960) Isothiazolin Tote Bins (Nalco 7330)	Attachment 2 & Figure 5	Secondary Containment Spill Prevention & Response Inspection Housekeeping

Changes to the above list does not necessarily require a revision to the SWPPP

Table 3
Miscellaneous Potential Pollutant Sources

Sources	SWPPP Reference	Best Management Practices
Industrial Materials Storage Areas Laydown Area Materials Staging Area (Scrap Metal & Wood) Equipment & Vehicle Staging Area	Figure 2	Inspection Housekeeping

Figure 1
 Stormwater Drainage Map

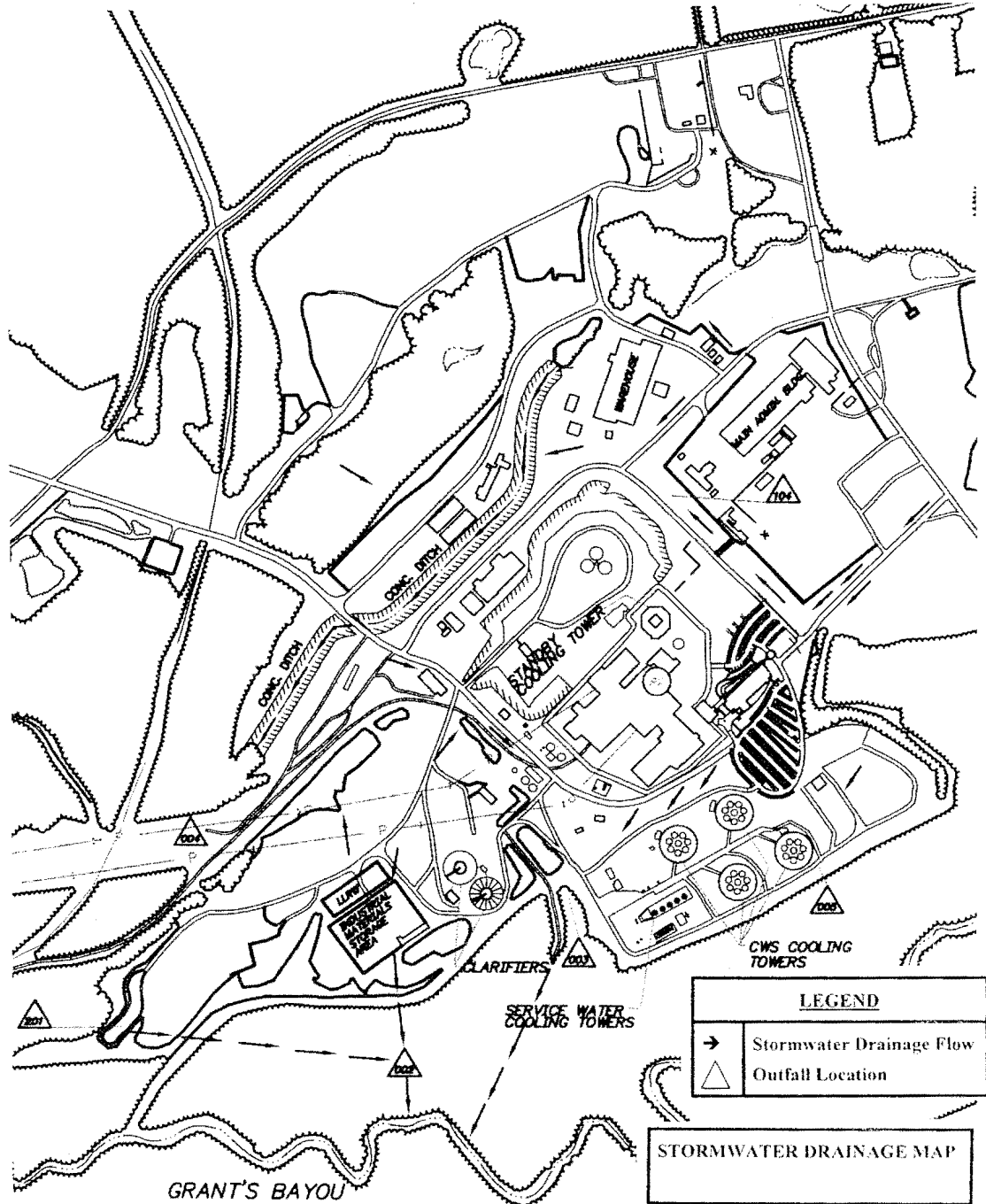
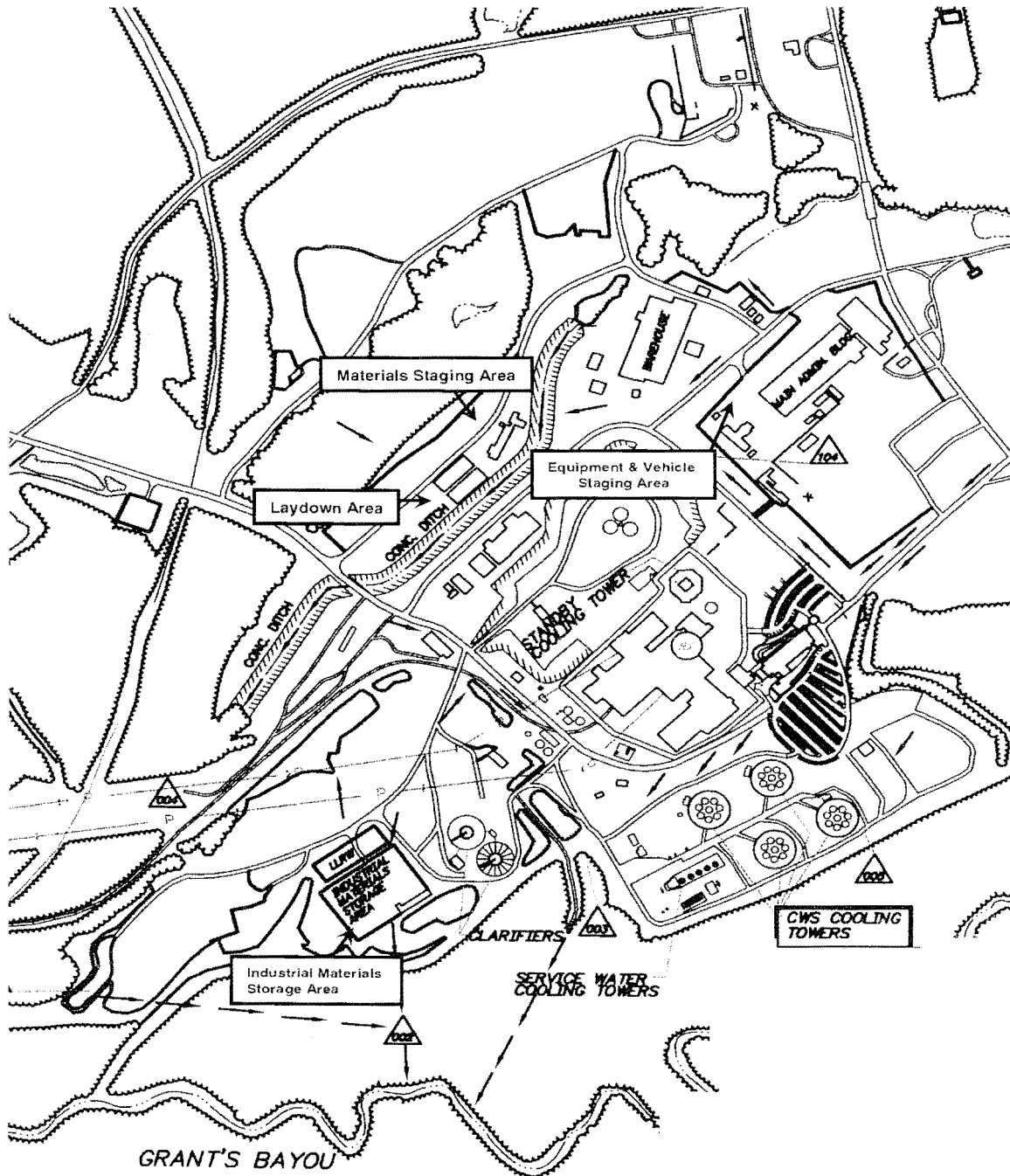


Figure 2
Miscellaneous Potential Pollutant Sources



Attachment I
Annual Stormwater Inspection Report (Typical)

Inspection Date:

Inspection Time:

Last Rainfall (Date & Amount):

Inspector(s):

Conditions Found (From Attached Form):

Corrective Actions (From Attached Form):

Changes Made to RBS SWPPP (From Attached Form):

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 gather and evaluate the information submitted. Based on my inquiry to 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.

Signature: _____

Title: _____

Date: _____

Attachment I

Annual Stormwater Inspection Form (Typical)

Observation	Yes	No
Industrial materials, residue or trash on ground that could contaminate or be washed away in stormwater.		
Leaks or spills from industrial equipment, drums, barrels, tanks or similar containers.		
Offsite tracking of industrial materials or sediment where vehicles enter or exit the site.		
Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas.		
Evidence of or potential for pollutants entering the drainage system.		
Best management practices (BMPs) identified in RBS SWPPP are operating correctly.		
BMPs are effective in preventing significant impacts to receiving waters where discharge locations or points are accessible. Where discharge locations are inaccessible, nearby downstream locations are inspected, if possible.		
Changes needed to the RBS SWPPP.		

ATTACHMENT II

Inspection Reports

ATTACHMENT III

Miscellaneous Addendums