Stormwater Pollution Prevention Plan

Nanogate North America LLC

October 2022

Contents

SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Nanogate North America LLC

Street: 150 East Longview Ave.

City: Mansfield State: Ohio ZIP Code: 44903

County or Similar Subdivision: Richland

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude: 40º46'38" Longitude: 82º30'30"

Method for determining latitude/longitude: Google Earth coordinates at plant entrance.

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

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 11.0 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☐ Yes ☒ No

Name(s) of water(s) that receive stormwater from your facility Adjacent wetlands areas to the west.

Are any of your discharges directly into any segment of an "impaired" water? ☐ Yes ☒ No

Do you discharge into a receiving water designated as a Tier 2 (or Tier 2.5) water? ☐ Yes ☒ No

Are any of your stormwater discharges subject to effluent guidelines? ☐ Yes ☒ No

Primary SIC Code or 2-letter Activity Code: 3089 (326199 NAICS, All Other Plastics Product Mfg.)

Identify your applicable sector and subsector: Sector Y / Subsector Y2

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: Nanogate North America LLC
Address: 150 East Longview Ave
City, State, Zip Code: Mansfield, Ohio 44903
Telephone Number: (419) 521-0117
Fax number: (419) 525-7827

SWPPP Contact:

Name: Scott Bobst, PE
Telephone number: (419) 521-0366
Email address: scott.bobst@nanogate.com

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Paul Boggs, CEO	Signatory Responsibility
Scott Bobst, Environmental Health Manager	-Develop and coordinate all phases of the Storm water Pollution Prevention Plan including implementation and training as required. -Arrange for testing of stormwater events as needed. -Maintain records of training and audits. -Prepare work orders to correct problems, where necessary. -Follow up to ensure that problems have been corrected. -Conduct/schedule annual comprehensive site evaluation -Perform monthly and quarterly inspections of plant areas and facilitate cleanup of process-related materials that could contaminate stormwater.
Rachel Wilson, Safety and 6S Coordinator	-Assist with monthly and quarterly inspections of plant areas when needed and facilitate cleanup of process-related materials that could contaminate stormwater. -Communicate and coordinate with the Environmental Health Manager.

1.4 Activities at the Facility

The facility molds and spray paints injection molded plastic components for the automotive industry. The facility utilizes robotic paint spray equipment during this process.

1.5 Site Map

A facility site map can be found in Attachment B to this Plan. As per the State of Ohio General Permit for Industrial Stormwater, OHR000007, the facility site map contains the following items:

- the size of the property in acres;
- the location and extent of significant structures and impervious surfaces;
- directions of stormwater flow (flow arrows);
- locations of all existing structural control measures;
- locations of all receiving waters in the immediate vicinity –N/A;
- locations of all stormwater conveyances including ditches, pipes, and swales;
- locations of potential pollutant sources identified under Section 2 of this plan;
- locations where significant spills or leaks have occurred – N/A;
- locations of all stormwater monitoring points (Outfall 001);
- locations of stormwater outfalls (Outfall 001);
- municipal separate storm sewer systems, where stormwater is discharged – N/A;
- locations and descriptions of all non-stormwater discharges;
- locations of the following activities where such activities are exposed to precipitation:
  - fueling stations – N/A;
  - vehicle and equipment maintenance and/or cleaning areas – N/A;
  - loading/unloading areas;
  - locations used for the treatment, storage, or disposal of wastes;
  - liquid storage tanks – N/A;
  - processing and storage areas;
  - immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
  - transfer areas for substances in bulk;
  - machinery; and
- locations and sources of run-on to the site from adjacent properties containing significant quantities of pollutants – N/A.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Material Storage (resin silos, pallets, dunnage, roll-off boxes, racks, empty drums/totes, and other miscellaneous material storage)	Total suspended solids (TSS), Oil & Grease (O&G), Chemical Oxygen Demand (COD), Biological Oxygen Demand (BOD)
Loading/Unloading	TSS, O&G, COD, BOD
Dust Collection	TSS
Cooling Water Systems	COD, BOD (only concern from additives if leaking)

2.2 Spills and Leaks

Significant spills and leaks include, but are not limited to, releases of oil and hazardous substances in excess of reportable quantities. Significant spills may also include chronic releases of oil or hazardous substances that are not in excess of reporting requirements. Instances of chronically repeated smaller spills can constitute significant spills if such spills, taken together, add significant amounts of pollutants to stormwater discharges. **The list of reportable quantities can be found in 40 CFR 302.4.**

☒ There have been no significant spills and leaks of toxic and hazardous materials that have entered a stormwater conveyance over the last three years.

☐ There have been significant spills or leaks that have entered a stormwater conveyance over the last three years. Table 2 is used to document the spill and leak assessment for the 3 years prior to permit issuance.

This plan is updated to include any releases of oil, non-hazardous, or hazardous substances in excess of reportable quantities that occur during the term of the permit.

Areas of the plant with the potential for spills/leaks to occur and their associated outfalls are listed in Table 1.

Table 1: Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Material Storage	001
Loading/Unloading	001
Dust Collection	001
Cooling Water System	001

Table 2: Description of Past Spills/Leaks

Date	Description	Outfalls
Past 3 years through 10/4/2022	None	None

2.3 Non-Stormwater Discharges Documentation

The following are authorized non-stormwater discharges:

- Discharges from fire-fighting activities (not planned exercises);
- Fire hydrant flushings;
- Potable water, including water line flushings;
- Uncontaminated condensate from air conditioners, coolers, and other compressors and
- from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied
- in accordance with the approved labeling;
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or
- hazardous materials have occurred (unless all spilled material has been removed);
- Routine external building washdown that does not use detergents;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of your facility, but not intentional discharges from the cooling tower (e.g., “piped” cooling tower blowdown or drains).
- Discharges from fire-fighting activities (not planned exercises);
- Fire hydrant flushings;
- Potable water, including water line flushings;

Non-stormwater discharge evaluation:

Date of Evaluation:	9/30/2022
Description of evaluation criteria used:	Observations of catch basins and outfall 001
List of the outfalls or onsite drainage points that were directly observed during the evaluation:	Outfall 001 and catch basins.
The different types of non-stormwater discharge(s) and source locations:	No sources of non-stormwater discharges identified
The action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. 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 sources of non-stormwater discharges identified

2.4 Salt Storage

There is no salt storage exposed to stormwater at this location.

2.5 Sampling Data Summary

Collection of sampling data is not required at this location.

SECTION 3: STORM WATER CONTROL MEASURES

3.1 Minimize Exposure

- Remind employees that materials stored outside must be free of contamination or fully covered to prevent contact with precipitation events.
- Assure that all employees observe loading/unloading operations and inspect areas for leaks and spills.

3.2 Good Housekeeping

- All materials are free of contaminants or covered prior to any outside storage or loading operations
- All materials or chemical products will be stored inside or under cover.
- All chemicals and oil products are stored indoors with spill pallets or covered outdoors with spill pallets.
- Any spills or leaks will be cleaned up as soon as possible.
- General sweeping is conducted where bulk products are stored, transferred or conveyed.

3.3 Maintenance

- Pipes, valves, hoses are free of leaks, significant seep.
- Overflow/overfill devices are maintained in good operating condition.
- Protective guards are provided around piping and hoses.
- Dumpsters and roll-offs have covers/lids.
- Equipment leaks will be repaired promptly.
- Retention pond and catch basins inspected for debris and sediment buildup (monthly)
- General grounds checked for erosion and erosion control measures in good operating condition.
- Operation/production equipment inspections conducted routinely.

3.4 Spill Prevention and Response

- Liquid tanks are stored inside. Secondary containment is provided for any outside liquid storage.
- Drip pans, spill containment pallets, sumps are used to minimize impact of potential release.
- Loading/unloading and material transfer operations are attended and equipment maintained in good operating condition to minimize potential for release.
- Spill response equipment is located centrally and near higher risk areas (e.g., raw material transfer, raw material handling areas)
- Personnel are trained annually in spill prevention and response measures (initial training under this program will be completed once the training program is developed by the Environmental Health Manager).

3.5 Erosion and Sediment Controls

- The facility is primarily composed of impervious surfaces, with few areas subject to erosion
- Soil surfaces are vegetated to minimize erosion.

3.6 Management of Runoff

- Storm water management area observations are conducted at least monthly.
- If utilized, discharge of stormwater from secondary containment or sumps will be evaluated for potential pollutants prior to discharge.

3.7 Salt Storage Piles or Piles Containing Salt

The facility does not store salt for deicing or other industrial activities.

3.8 Sector-Specific Control Measures/BMPs

The facility has no exposure of stormwater to zinc. Therefore, additional control measures/BMPs related to Industrial Sector Y Subsector Y2 do not apply.

3.9 Employee Training

General stormwater awareness training will be conducted once per year or within 1 month after a change in this plan or a change in employee responsibility (initial training under this program will be completed once the training program is developed by the Environmental Health Manager). Employee training programs inform personnel at all levels of responsibility of the components and goals of the SWPPP. Training addresses each component of the pollution prevention plan, including how and why tasks are to be implemented.

Training incorporates the following:

- **Pollution Prevention Awareness**
  - Provide training on pollution control laws and regulations
  - Familiarize employees with the SWPPP and how the facility and its processes affect pollution prevention
  - Emphasize each employee's responsibility to protect the environment
  - Assure that contractor personnel are made aware of the pollution prevention policies, controls and practices as part of their orientation to the plant

- **Spill Prevention and Response**
  - Assure employees are familiar with spill response procedures.
  - Assure that employees know where clean up and spill response equipment is stored.
  - Remind employees that wash downs or spraying of any plant equipment using detergents, including fork trucks is prohibited.
  - Identify potential spill area, drainage routes and locations of spill response equipment

- Explain how to handle materials and store containers properly

- **Good Housekeeping**
  - Assure employees are aware of and perform basic clean-up procedures
  - Encourage attitude of "continuous inspection"
  - Encourage employees to be vigilant about recognizing and acting on potential contamination.
  - Remind employees of the importance of keeping wastes in designated areas. Wastes should be contained and covered to minimize stormwater exposure whenever possible.
  - During each shift, employees are responsible for cleaning, inspecting inventories and organizing work areas. In each work area, designated employees are responsible for maintaining this schedule.
  - Inspection and cleaning of roof areas.

- **Materials Management**
  - Instruct employees on securing drum lids, storage tank valves, fabric covers and waste containers.
  - Identify all toxic and hazardous substances stored, handled and produced on-site, point out their locations and review the labeling that identifies these substances. Review handling these substances.

- **Finished Product Storage/Loading-Unloading**
  - Remind employees that any materials being stored outside must be free of contaminants or fully covered to prevent contact with precipitation events.
  - Assure that all employees observe loading/unloading operations and inspect areas for leaks and spills.

Training will be documented in PLEX and records kept by the Human Resource Manager.

On-site contractors and temporary personnel are also informed of the components and goals of the SWPPP.

3.10 Non-Stormwater Discharges

Non-stormwater discharges are addressed in Section 2.3 of this plan.

3.11 Waste, Garbage and Floatable Debris

The following Waste, Garbage and Floatable Debris procedures shall be implemented at the facility:

- Routine inspections for waste, garbage and floatable debris.
- Waste, garbage, and floatable collected and disposed of properly on a regular basis.

3.12 Impaired Waters Monitoring

Nanogate North America LLC does not discharge pollutants into impaired waters.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Stormwater Discharge Benchmark Monitoring

Storm water discharge benchmark monitoring is not required for Nanogate North America LLC based on industrial sector, Y subsector, Y2.

SECTION 5: INSPECTIONS

5.1 Inspection Schedules

Inspections schedules for Nanogate North America LLC are described in the following table:

Monitoring Type	Inspection Location(s)	Parameters To Be Inspected	Inspection Schedule	Procedures
Monthly Routine Facility Inspection	Material Storage Areas Loading/Unloading Dust Collectors	Existing or Potential Stormwater Contamination/New Exposed Sources	Monthly	Stormwater Coordinator or designated personnel perform inspections in accordance with Section 5.2 of this plan.
Stormwater Discharge Visual Inspections	Storm water visual inspections shall take place at Outfall 001 designated on the site map in Attachment B.	Color Odor Clarity Floating Solids Settled Solids Foam Oil Sheen Other Pollution Indicators	Quarterly	Collect sample in a clean, clear glass, and examine in a well-lit area. Samples are to be collected within 30 minutes of an actual discharge from a storm event, and at least 72 hours from the previous storm event.
Annual Report			Annually	Complete the Annual Report for Stormwater Discharges Associated with Industrial Activity

5.2 Inspection Procedures

Monthly Routine Visual Inspections

On a monthly basis the Environmental Health Manager or his designated representative shall inspect the following areas for signs of existing or potential stormwater contamination and to ensure that best management practices outlined in Section 2.1 and Section 3 are implemented:

- Material Storage
- Truck loading and unloading.
- Solid/Liquid material storage.
- Roof of building.
- Outside dumpsters.
- Pallet storage.
- Vehicle parking/traffic areas
- Waste Storage Areas
- Any new exposed sources.

Stormwater Discharge Quarterly Visual Inspections

Nanogate North America LLC will visually inspect stormwater discharges from a storm event once per quarter of each year. The visual inspections will occur during the first 30 minutes of discharge at Outfall 001.

Visual inspections are required of stormwater discharges that occur during daylight hours that are preceded by at least three (3) working days without stormwater discharges and that occur during scheduled facility operating hours.

Storm water will be taken from sample locations and placed in a clear sample jar for visual inspection. The visual inspections will document the presence of any of the following:

- Color;
- Odor;
- Clarity;
- Floating Solids;
- Settled Solids;
- Foam;
- Oil Sheen; and
- Other Pollution Indicators.

Records will be maintained of inspection dates, locations inspections, observations, and response taken to reduce or prevent pollutants in stormwater discharges. Based upon the above information, the SWPPP shall be revised, as necessary, and implemented in accordance with the General Permit specifications.

Storm water visual inspections shall occur at the outfall 001 shown on the facility map in Attachment B to this plan. The inspections will be conducted by designated company personnel.

Annual Report

The facility will complete the Annual Report for Stormwater Discharges Associated with Industrial Activity on an annual basis within 8 – 16 months of each other.

SECTION 6: SWPPP MODIFICATIONS

The SWPPP must be modified whenever necessary to address any of the following triggering conditions to ensure that the condition is eliminated and will not be repeated in the future:

- an unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by another NPDES permit);
- a discharge violates a numeric effluent limit;
- you become aware, or Ohio EPA determines, that your control measures are not stringent enough for the discharge to meet applicable water quality standards;
- an inspection or evaluation of your facility by an Ohio EPA official or local MS4 operator determines that modifications to the control measures are necessary to meet the control measures/best management practices; or
- there is a determination from routine facility inspections, quarterly visual assessments, or comprehensive site inspections that control measures are not being properly operated and maintained

A discovery of one of the above conditions must be documented within 24 hours, and corrective action (or the reason why corrective action is not needed) must be completed within 30 days.

SECTION 7: SWPPP AVAILABILITY

This plan is maintained by the Environmental Health Manager and must be immediately available to Ohio EPA, a local agency approving stormwater management plans, and the operator of an MS4 receiving discharges from the site (city of Mansfield). This plan must be immediately available to the public when requested.

SECTION 8: DOCUMENTATION AND RECORDKEEPING

The following documentation is part of this plan:

- The NOI submitted to Ohio EPA along with any correspondence exchanged between you and Ohio EPA specific to coverage under this permit (located in Attachment A);
- A copy of letter received from Ohio EPA acknowledging coverage under the general permit (Attachment A);
- General permit (https://epa.ohio.gov/static/Portals/35/permits/OHR000007.pdf);
- Descriptions and dates of any incidences of significant spills, leaks, or other releases (Description in Section 2.2 with detailed report kept on the EHS network drive);
- Employee training records (Training records kept in PLEX);
- Documentation of maintenance and repairs of control measures (Noted in monthly inspection logs when applicable);
- Inspection reports and annual reports (Kept on EHS network drive.);
- Visual Assessment schedule deviation (Quarterly visual assessment reports are kept on the EHS network drive which includes reasons for schedule deviations where they exist);
- Corrective action documentation (kept as part of the monthly inspection reports when applicable);
- Documentation of benchmark exceedances and responses (kept on the EHS network drive if applicable);

All records, data, and reports must be kept for the duration of coverage under the general permit plus 3 years.

SECTION 9: 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 contained 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: Paul Boggs Title: CEO

Signature: Paul Boggs Date: 10/25/22

SWPPP ATTACHMENTS

Attach the following documentation to the SWPPP:

Attachment A – Notice of Intent (NOI) and Approval Letter

Attachment B – Maps

Attachment A – Notice of Intent (NOI) and Approval Letter

Ohio Environmental Protection Agency

Division of Surface Water - Notice of Intent (NOI) For Coverage Under *Ohio EPA Industrial Storm Water General Permit (OHR000007)*

(Read accompanying instructions carefully before completing this form.)

Submission of this NOI constitutes notice that the party identified in Section I of this form intends to be authorized to discharge into state surface waters under Ohio EPA's NPDES general permit program. Becoming a permittee obligates a discharger to comply with the terms and conditions of the permit. Complete all required information as indicated by the instructions. Do not use correction fluid on this form. Forms transmitted by fax will not be accepted. A check for $350 must accompany this form and be made payable to "Treasurer, State of Ohio."

I. Applicant Information/Mailing Address

Company (Applicant) Name: Nanogate North America, LLC

Mailing (Applicant) Address: 150 East Longview

City: MANSFIELD | **State :** OH | **Zip Code:** 44903

Country: USA

Contact Person: Scott Bobst | **Phone:** (419) 521-0366 | **Fax:**

Contact E-mail Address: scott.bobst@nanogate.com

II. Facility/Site Location Information

Facility/Site Name: Nanogate North America LLC

Facility Address: 150 E Longview Ave

City: Mansfield | **State:** OH | **Zip Code:** 44903

County: Richland | **Township:**

Facility Contact Person: Scott Bobst | **Phone:** (419) 521-0366 | **Fax:**

Facility Contact E-mail Address: scott.bobst@nanogate.com

Latitude: 40.77611111 | **Longitude:** -82.51 | **Facility/Map Attachment** <none>

Receiving Stream or MS4: Touby's Run

III. General Permit Information

General Permit Number: OHR000007 | **Initial Coverage:** Y **Renewal Coverage:** N

Existing NPDES Facility Permit Number(if applicable): 2GR02314*AG | **Primary SIC Code:** 3089

Outfall	Benchmark Monitoring	SIC Code(s)	Subsector	Federal Effluent Limitation(if applicable)	Latitude	Longitude
001	*N*			*Not Applicable*	*40.776340*	*-82.510033*

IV. Payment Information

Check #:

Check Amount:

Date of Check:

For Ohio EPA Use Only

Check ID(OFA):_____ **ORG #:**_____

Rev ID:_____ **DOC #:**_____

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 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.

Applicant Name: Scott Bobst | **Title:** Environmental Health Manager

Signature:
Electronically submitted by sbobst

Date:
Electronically submitted on 08/25/2022

ADDITIONAL INFORMATION

Please add any additional comments or attachments below.

EPA 4120 (Rev 11/12) Application ID: 264511376 Page 1 of 1

Attachment B – Maps


Key:
Property Line ~ 11 Acre Area
Wetland Area
Outfall 001
Retention Pond
Resin Silos
Catch Basin
Storm Water Flow Direction
Loading Docks
E Longview Ave