

Stormwater Pollution Prevention Plan (SWPPP)

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1 Introduction

1.1 Background

In 1972, Congress passed the Federal Water Pollution Control Act (FWPCA), also known as the Clean Water Act (CWA), to restore and maintain the quality of the nation's waterways. The ultimate goal was to ensure rivers and streams are fishable, swimmable, and drinkable. In 1987, the Water Quality Act (WQA) added provisions to the CWA allowing the EPA to govern storm water discharges from industrial activities. EPA published the final notice for Phase I of the Multi-Sector General Storm Water Permit program (Federal Register Volume 60 No. 189, September 20, 1995, page 50804) in 1995 to include provisions for development of a Storm Water Pollution Prevention Plan (SWPPP) by each industrial facility discharging storm water.

Development, implementation, and maintenance of the SWPPP will provide BMSC with the tools to reduce pollutants contained in storm water discharges and comply with requirements of the General Storm Water Permit issued by the State of Texas (Permit No. TXR050000).

The primary goals of the SWPPP will be to:

- Ensure storm water discharged to the municipal storm water system is compliant.
- Identify potential sources of pollutants that affect storm water discharges from site.
- Describe practices that will be implemented to prevent or control release of pollutants in storm water discharges.
- Create an implementation schedule to ensure that the practices described in this SWPPP are in fact implemented and to evaluate the plan's effectiveness in reducing the pollutant levels in storm water discharges.

1.2 SWPPP Content

This SWPPP includes all of the following:

- Identification of SWPPP Coordinator with a description of their duties.
- Identification of SWPPP implementation Team Members.
- Description of facility, including information regarding location and activities, site description, maps, and summary of storm water drainage system.
- Identification of potential storm water contaminants.
- Description of storm water management controls and Best Management Practices (BMPs) necessary to reduce pollutants in storm water discharge.
- Description of facility monitoring plan.
- Description of implementation schedule and provisions for plan amendment.



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2 SWPPP Coordinators and Duties

The SWPPP coordinators for the facility are:

2.1 EHS Manager Duties (Phone 972-241-9665 Ext. 388)

- Create a SWPPP team to aid in the implementation of the SWPPP plan.
- Implement the SWPPP.
- Implement and oversee employee training.
- Conduct or provide for inspection or monitoring activities.
- Identify other potential pollutant sources and ensure they are added to the plan.
- Identify any deficiencies in the SWPPP and ensure they are corrected.
- Prepare and submit reports.
- Ensure any changes in facility operation are addressed in the SWPPP.

2.2 Facility Manager Duties (Phone 972-241-9665 Ext. 360)

- Oversee maintenance practices identified as BMPs in the SWPPP.
- Implement the SWPPP.
- Set the order of BMPs and conduct BMP inspections.
- Identify potential pollution sources from facility maintenance activities.
- Notify EHS Manager of any changes in facility operations that need to be addressed in the SWPPP.

2.3 Team Members

- The Warehouse Manager ensures that all truck loading and unloading procedures are implemented.
- Warehouse Supervisors ensure all truck loading and unloading is monitored, spills are cleaned up, and ensure the integrity of the structural BMPs.

3 Facility Description

3.1 Location

BMSC is located at 1250 Freeport Parkway in Coppell, Dallas County, Texas. A map showing the location of the site is provided in Attachment 1, Facility Location. The facility is on an 18.36-acre parcel bound on the North by Wrangler Drive, the west by Freeport Parkway, the south by Dividend Drive, and the east by Coppell Middle School.

3.2 Site Activities

BMSC is a contract manufacturer of beauty, personal care, and baby care products. Approximately 75% of products produced are creams, lotions, and non-alcohol-based liquids, 5% are alcohol-based products (fragrances, cosmetic brush cleaners, etc.), and 20% are color cosmetics. BMSC operations consists of receipt of raw materials, pre-weighing of materials, blending of products per customer specifications, filling product containers, and packaging finished units. BMSC is registered with the FDA to produce Over-the-Counter (OTC) products and is Health Canada certified.



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The current building is approximately 320,000 square feet in total, with two stories of manufacturing and office space (approximately 240,000 square feet) and one-story of high-bay warehouse space (80,000 square feet).

There are 4 filling/assembly areas, two located on the first floor and two on the second floor. They consist of 32 filling/assembly lines, including two alcohol filling lines. There are also four compounding areas, two located on the first floor and two on the second floor, including an alcohol compounding room on the first floor and powder blending areas on the second floor. There are two warehouse storage areas, one for raw materials and one for finished goods. Ancillary operations include a maintenance shop, equipment sanitation, three small bench-top laboratories, a Reverse Osmosis/Deionized (RO/DI) process for incoming water, a wastewater treatment plant, two natural gas boilers, air compressors, chiller units, and a natural gas emergency generator.

The facility operates 20 hours per day, 7 days per week, and total employees is approximately 380.

3.3 Site Description

The total area of the site is approximate 18.36 acres. Impervious surface coverage is 12.0 acres (82%), total pavement coverage is 6.30 acres (34%), and building coverage is 5.70 acres (48%). Refer to Attachment 1.

3.4 Storm Water Drainage System

Attachment 2, Drainage Area (DA) and Outfall Location Map, shows the locations of the 38 drainage areas, area, runoff coefficient, and storm water drains. Runoff Coefficient:

- High: 70 – 100% impervious (asphalt, buildings, paved surfaces)
- Medium: 40-70% impervious (packed soils)
- Low: 0-40% impervious (grassy areas)

Table 1: Characteristics of Storm Water Drainage

DA 1	Paved Driving Area	Affected by industrial activities.	Included
DA 2	Naterra Paved Driving Area		Not Included
DA 3	Warehouse Shipping, Dumpster, & Wastewater Treatment Plant		Included
DA 4	Boiler, Chiller, Dust Control, & Alcohol Tank Areas		Included
DA 5	Tank Farm Unloading Area		Included
DA 6	Warehouse Receiving Area		Included
DA 7	Unpaved Grassy Area	Not Affected by industrial activities.	Not Included
DA 8	Paved Parking	Affected by industrial activities.	Not Included
DA 9	Paved Parking		Not Included
DA 10	Production Building	Affected by industrial activities to DA 6.	Included
DA 11	Production Building	Affected by industrial activities to DA 5.	Included
DA 12	Production Building	Affected by industrial activities to DA 4.	Included
DA 13	Production Building	Affected by industrial activities to DA 3.	Included
DA 14	Naterra Paved Parking	Ultimately discharged to Grapevine Lake through municipal storm system.	Not Included
DA 15	Unpaved Grassy Area		Not Included



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Table 1: Characteristics of Storm Water Drainage

DA 16	Production Building	Affected by industrial activities to DA 2.	Included
DA 17	Office Building	Ultimately discharged to Grapevine Lake through municipal storm system.	Not Included
DA 18	Office Building		Not Included
DA 19	Office Building		Not Included
DA 20	Office Building		Not Included
DA 21	Office Building		Not Included
DA 22	Office Building		Not Included
DA 23	Office Building		Not Included
DA 24	Office Building		Not Included
DA 25	Office Building		Not Included
DA 26	Office Building		Not Included
DA 27	Paved Driveway		Included
DA 28	Office Building		Not Included
DA 29	Office Building		Not Included
DA 30	Office Building		Not Included
DA 31	Office Building		Not Included
DA 32	Office Building		Not Included
DA 33	Office Building		Not Included
DA 34	Office Building		Not Included
DA 35	Office Building		Not Included
DA 36	Office Building		Not Included
DA 37	Office Building		Not Included
DA 38	Office Building		Not Included
OS 1	Gateway Business Park		Not Included

4 Identification of Potential Storm Water Contaminants

This SWPPP focuses on drainage areas affected by industrial activities.

This section identifies significant materials located at the facility that may potentially contaminate storm water. Additionally, this section presents a record of past spills and leaks, and identifies potential areas for storm water contamination.

Table 2: Storm Water Potential Contaminate Sources, Records, and Prevention

	Table 2: Storm Water Potential Contaminate Sources, Records, and Prevention			
Area	Potential Pollutants		Historic Spill & Leak Record	Prevention
DA 1	Leaking from Vehicles		No Record	Driver & Warehouse Visual Check
DA 3	Dumpster Leak, Wastewater Overflow, Chemical, & Sludge Transportation		Sludge, Chemical, and Dumpster Spill & Leak	Secondary Containment Installed, Spill Kit Available at Wastewater Plant
DA 4	Vacuum Pump, Dust Control, Alcohol Tank, & Unloading		No Record	Spill Kit Nearby
DA 5	Tank Farm Unloading		Chemical Spill and Truck Leak	Spill Kit at Unloading Area
DA 6	Material Receiving of Raw & Bulk Container Leak		No Record	Spill Kit Available at Warehouse Receiving
DA 10	Powder from Production			Central Dust Collector
DA 11				Central Dust Collector
DA 12				Central Dust Collector
DA 13	Leaking from Vehicles			Driver & Warehouse Visual Check
DA 16	Powder from Production			Central Dust Collector
DA 27	Leaking from Vehicles			Driver & Warehouse Visual Check

Table 3: Potential Contaminant at Drainage Areas



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Table 3: Potential Contaminant at Drainage Areas

Area	Potential Contaminants	Sampling Point
DA 1	Vehicle Fluids	N/A
DA 3	Wastewater	Outfall 004
	Polymer	
	Coagulant	
	Caustic	
	Sulfuric Acid	
	Anti-Foam	
DA 4	Alcohol	Outfall 003
DA 5	Zinc Oxide Powder	Outfall 002
	TF-1 Glycerin	
	TF-2 Pureact	
	TF-3 Cocamidopropyl Betaine	
	TF-4 Glycerin	
	TF-5 Glycerin	
DA 6	Vehicle Fluids	Outfall 001
DA 10	Zinc Oxide	Outfall 001
DA 11		Outfall 002
DA 12		Outfall 003
DA 13		Outfall 004
DA 16		N/A
DA 27	Vehicle Fluids	N/A

5 Storm Water Management Controls

This section discusses the storm water management controls required by the permit and describes the management practices selected to address the areas of concern identified.

5.1 DA 1

Best Management Practices of Structure Control:

Secondary containment has been installed at wastewater treatment plant to prevent storm water contamination. Manually operated valves are installed. Pumps used to empty containment area are manually activated. Refer to Attachment 3, Emergency Spill Kit Location.

5.2 Storm Water Treatment

No storm water treatment measures are currently in place at the facility.

6 Compliance and Reporting Requirements

6.1 SWPPP and SWPPP Summary

Per the requirements of the General Permit to discharge under the Texas Pollutant Discharge Elimination system TXR050000 from Texas Commission on Environmental Quality (TCEQ), BMSC is permitted to discharge storm water associated industrial activity to surface water in the state. BMSC is required to prepare a SWPPP by the effective date of August 15, 2021. The SWPPP will be kept at the facility and will be made available to the state or federal compliance inspection officer upon request.



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- BMSC Storm Water Permit TXR05CP19
- Sector C of Industrial Activity – Chemical & Allied Products Manufacturing Facilities
- 2844 Soap and Detergents; Perfumes, Cosmetics, and Other Toilet Preparations
- Permit Benchmark Parameter and Value:
 - Nitrate + Nitrite N 0.68 mg/L
 - Zinc, total 0.16 mg/L

6.2 Storm Water Monitoring and Sampling

- 6.2.1 Monitoring must be conducted during the facility's normal hours of operation.
- 6.2.2 A qualifying storm event is a measurable storm event that results in an actual discharge from the site, and that follows the preceding measurable storm event by at least 72 hours (3 days).
- 6.2.3 A rain gauge at the wastewater treatment plant must be monitored a minimum of once per week, and once per day during any storm event. Records of the date and rainfall total must be retained and readily available for review.
- 6.2.4 All samples must be representative of the discharge.
- 6.2.5 Sampling should be conducted within the first 30 minutes of discharge using a grab sample.
- 6.2.6 Sampling, inspections, and examination must be conducted during the following periods:
- First Period: January 1 through June 30
 - Second Period: July through December 31
- Findings must be documented by the following:
- Color
 - Clarity
 - Floating Solids
 - Settled Solids
 - Suspended Solids
 - Foam
 - Oil Sheen
 - Noticeable Odors
 - Others
- 6.2.7 Samples are sent to a certified lab for analysis.
- 6.2.8 Results from benchmark monitoring are used to determine if the selected BMPs are effective. All sample results must be included in the calculation and reporting of the values recorded on the DMR form.
- 6.2.9 Refer to Attachment 4, Rain Gauge Monitoring and Recordkeeping, and Attachment 5, Semi-Annual Visual Monitoring Results



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6.3 Compliance Report

Storm Water Benchmark Monitoring Report for Facilities Authorized under the Multi Sector General Permit (TXR050000) in Section C is required to be submitted to TCEQ by March 31 of each year, regardless of if there was an exceedance or not.

6.4 Employee Training

An employee training program shall be developed and implemented to educate employees about the requirements of the SWPPP. This education program will include background on the components and goals of the SWPPP, as well as hands-on training in spill prevention and response, good housekeeping, proper material handling, disposal and control of waste, container filling and transfer, and proper storage, washing, and inspection procedures.

6.5 Record Retention Requirements

Records described in the SWPPP must be retained on site for 5 years beyond the date of the cover letter notifying the facility of coverage under a storm water permit, and shall be made available to the state or federal compliance inspection officer upon request.

6.6 Provisions for Amendment of the Plan

If the facility expands, experiences any significant production increase or process modifications, or changes any significant material handling or storage practices that could impact storm water, the SWPPP shall be amended appropriately. The amended SWPPP shall have a description of the new activities that contribute to the increased pollutant loading and planned source control activities.

The SWPPP shall also be amended if the state or federal compliance inspection officer determines that it is ineffective in controlling storm waste pollutants discharged to waters.

7 Certified Executive Officer Signature

The electronic approval on the cover page of this document, as approved within the Document Control System (Intellect) used at BMSC, certifies the following:

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 submitted. Based on my inquiry of the person or persons who manages 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 fines and imprisonment for known violations.



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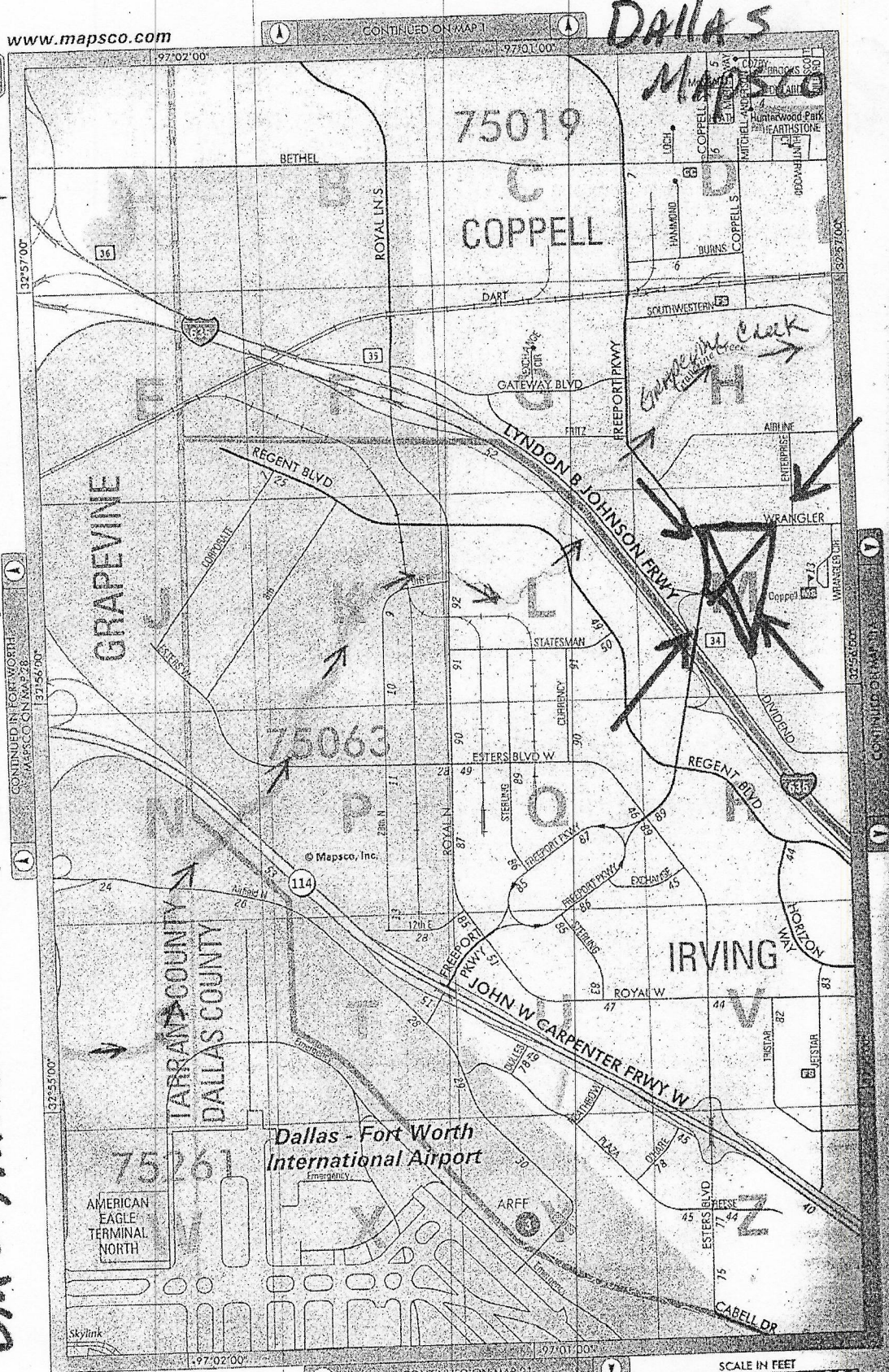
Attachment 1: Facility Location

Dallas

BM SC/NATERRA Corporate Headquarters

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17



SCALE IN MILES
0 1/4 1/2 3/4 1

BOOK PAGE 1018

CONTINUED ON MAP 21
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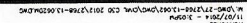
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Attachment 2: Drainage Area (DA) and Outfall Map





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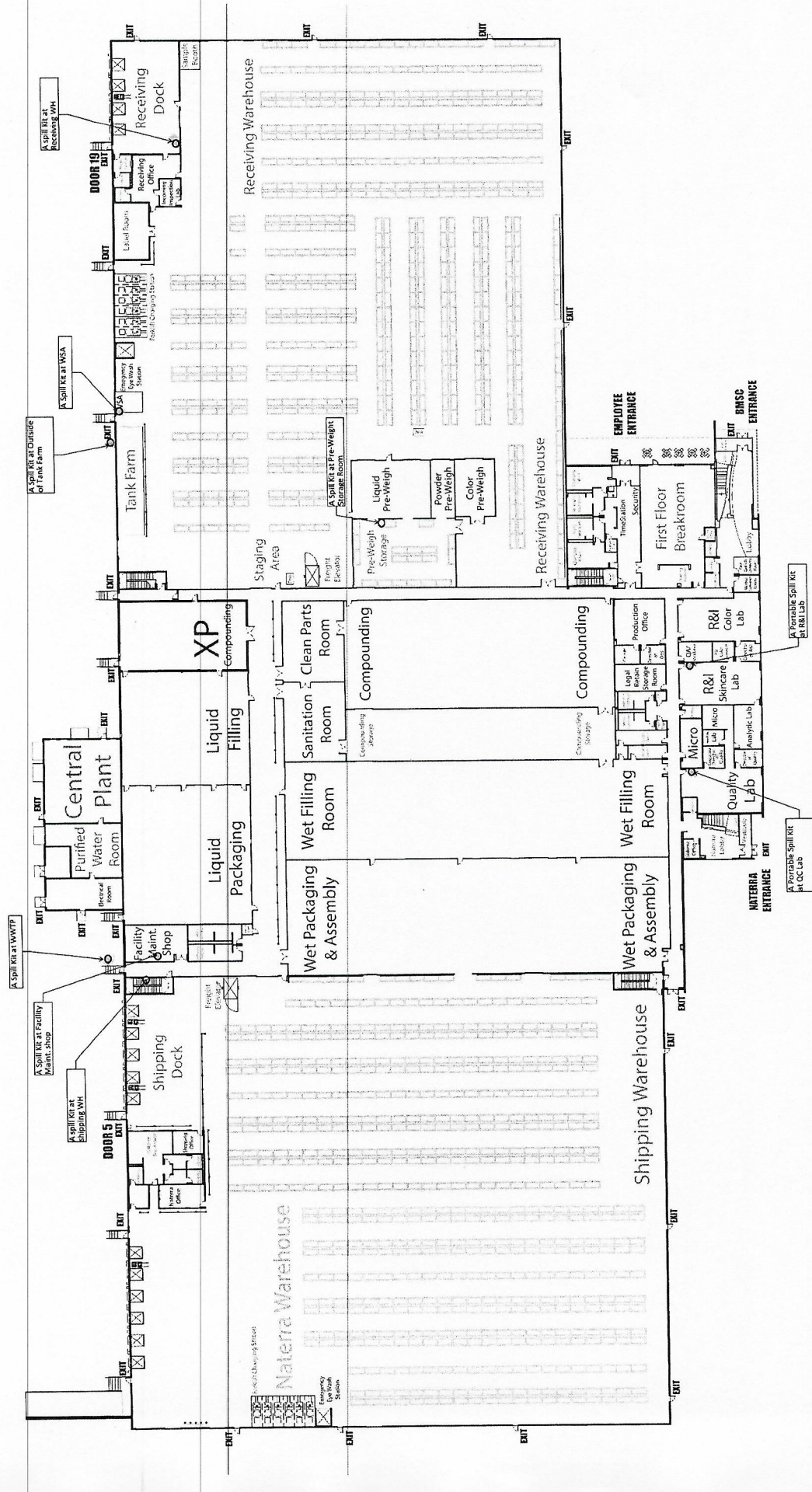
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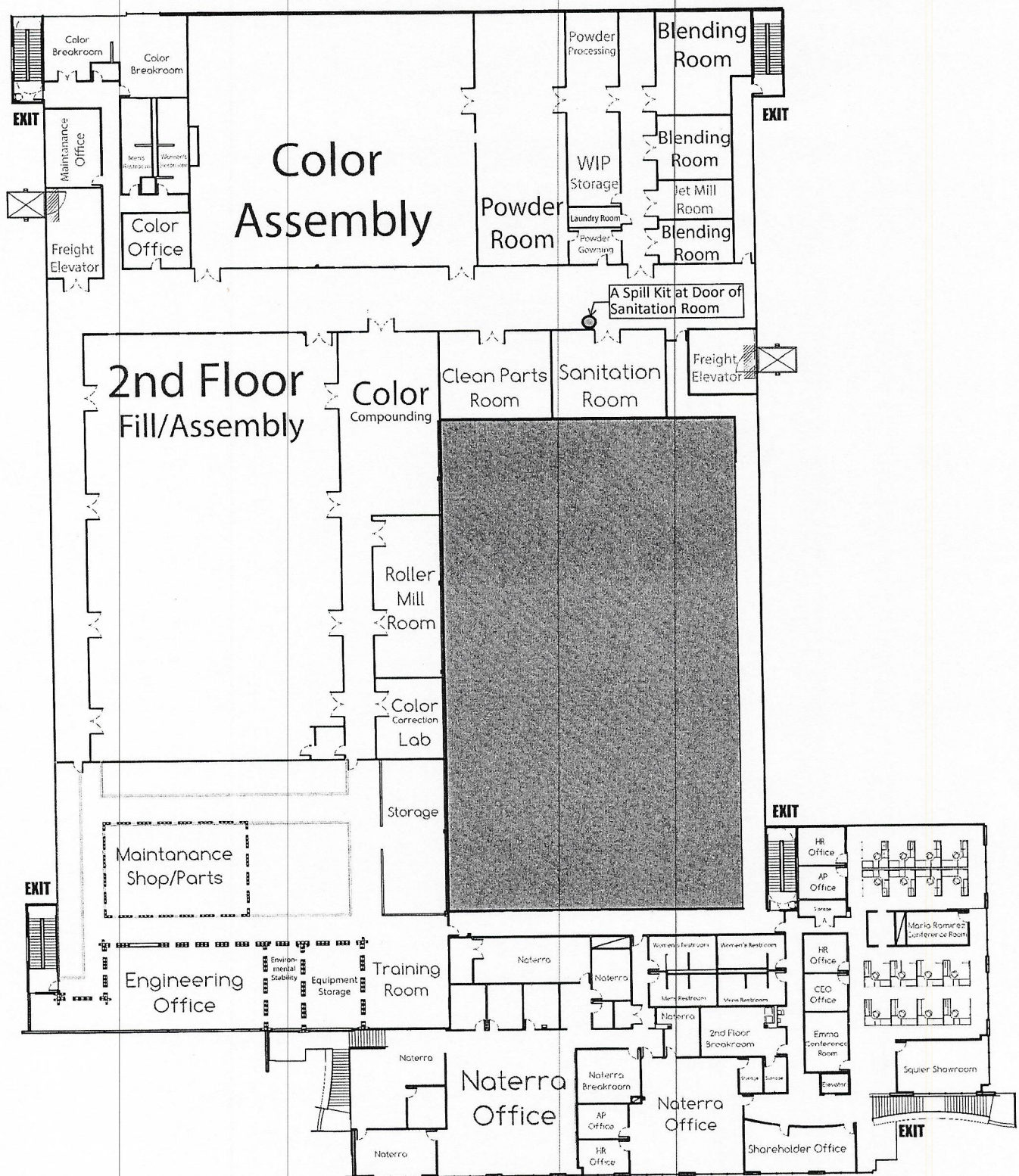
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Attachment 3: Emergency Spill Kit Locations



Plant Diagram Ground Floor



Plant Diagram 2nd Floor



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Attachment 4: Rain Gauge Monitoring and Recordkeeping

Refer to Form EHS-15, Rain Gauge Monitoring and Recordkeeping



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Attachment 5: Semi-Annual Visual Monitoring Results

Refer to Form EHS-16, Semi-Annual Visual Monitoring Results

Semi-Annual Visual Monitoring Results

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Complete a separate form for each sample collected (one form per Outfall).

Outfall #:	Person Collecting and Examining Sample:		
6 th Month/Year:	Collected – Day:	Time: ☐ AM ☐ PM	Examined – Day: Time: ☐ AM ☐ PM
Rainfall Amount:	Qualifying: ☐ Yes ☐ No		Runoff Source: ☐ Rainfall ☐ Snowmelt
Parameter	Parameter Description		Parameter Characteristics
Color	Does the sample appear to be colored? ☐ Yes ☐ No		Describe:
Clarity	Is the sample clear or transparent (can you see through it)? ☐ Yes ☐ No		Which of the following best describes the clarity of the water? ☐ Clear ☐ Milky ☐ Opaque
Oil Sheen	Can you see a rainbow effect or sheen on the water's surface? ☐ Yes ☐ No		Which of the following best describes the water's sheen? ☐ Oily ☐ Silver ☐ Iridescent
Odor	Does the sample have an odor? ☐ Yes ☐ No		Describe:
Floating Solids	Is there something floating on the surface of the sample? ☐ Yes ☐ No		Describe:
Suspended Solids	Is there something suspended in the water column or sample? ☐ Yes ☐ No		Describe:
Settled Solids	Is there something at the bottom of the sample? ☐ Yes ☐ No		Describe:
Foam	Is there foam or material forming on top of the sample? ☐ Yes ☐ No		Describe:
Detail any concerns, corrective actions taken, and any other obvious indicators of pollution present in the sample:			
Collector/Examiner's Signature:			