

ETOWAH RIVER TERMINAL, LLC.

**“STORM WATER POLLUTION PREVENTION  
PLAN”  
(SWPPP)**

**DRAFT**

KANAWHA COUNTY, WEST VIRGINIA

February 14, 2002

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# STORM WATER POLLUTION PREVENTION PLAN

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## **SECTION 1 – INTRODUCTION**

This storm water pollution prevention plan (SWPPP) was prepared for the Etowah River Terminal, LLC located along the Elk River in Kanawha County, West Virginia. The facility is registered under the West Virginia National Pollution Discharge Elimination System (NPDES) Multi-Sector General Permit for Storm Water Associated with Industrial Activity in West Virginia (Permit Number WV0111457). Etowah River Terminal, LLC has applied to the West Virginia Department of Environmental Protection (WVDEP) to transfer the existing NPDES General Permit for the site, from Pennzoil Quaker State to themselves. A copy of the permit transfer will be included with the SWPPP once approval from the WVDEP is received. This plan satisfies the requirements for a SWPPP under the NPDES permit registration.

The SWPPP assesses the potential pollutant sources and identifies best management practices at the facility, procedures for implementing the plan and for evaluating/monitoring the effectiveness of the plan. The SWPPP should be kept at the facility. The plan should be reviewed and updated regularly.

## **SECTION 2 – POLLUTION PREVENTION TEAM**

The pollution prevention team includes individuals at the Etowah River Terminal Facility who will be responsible for various aspects of the development, implementation, and maintenance of the SWPPP. Worksheet #1 identifies the members of the pollution prevention team and their responsibilities associated with the SWPPP.

## **SECTION 3 – ASSESSMENT**

This section includes an assessment of the facility and operations to determine what materials or practices are or may be a source of contaminants to the storm water discharges from the site.

### **3.1 Site Map**

- A site map is included at the end of this section.

### **3.2 Materials Inventory**

The SWPPP must include a current inventory of the types of materials that are handled, stored, or processed at the facility. “Significant Materials” are defined as: Raw materials; fuels; materials such as solvents, detergents and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under section 101(14) of CERCLA; any chemical the facility is required to report pursuant to EPCRA, section 313; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges (federal regulation 40 CFR 122.26(b)(12)). The materials inventory is included in Worksheet #3 at the end of this section.

### **3.3 Past Leaks and Spills**

Worksheet #4 contains a list of the leaks and spills that have occurred in the last three years. This list contains both significant spills of toxic or hazardous substances and spills and leaks of non-hazardous substances. “Significant spills”, or reportable quantity (RQ) releases includes releases in excess of reportable quantities. A reportable quantity release is defined as a release that occurs when a quantity of hazardous substance or oil is spilled or released within a 24-hour period of time and exceeds the RQ level assigned to that substance under CERCLA or the Clean Water Act. Regulations listing these quantities are contained in 40 CFR 302.4, 40 CFR 117.3.

### **3.4 Non-Storm Water Discharges**

The facility should be tested or evaluated for non-storm water discharges. Examples of non-storm water discharges include any water used directly in a manufacturing process, air conditioning condensate, vehicle wash water, or sanitary wastes. Unless specifically covered by a NPDES permit, non-storm water discharges may be illegal. However, the general permit allows for the following types of non-storm water discharges: Discharges from fire fighting activities; fire hydrant flushing; potable water sources including waterline flushings; irrigation drainage; lawn watering; uncontaminated groundwater; foundation or footing drains where flows are not contaminated with process materials;

discharge from springs; routine exterior building washdown which does not use detergents or other compounds; pavement wash waters where spills or leaks of toxic or hazardous substances have not occurred and where detergents are not used; air conditioning condensate.

Non-storm water discharges can be checked by using one of the following three common dry weather tests: visual inspection; plant schematic review; and/or dye testing. Based on visual inspection, there are currently no non-storm water discharges at the site. Worksheet #5, included at the end of this section, contains a summary of the non-storm water discharge assessment and certification.

### **3.5 Existing Monitoring Data**

There is currently no storm water sampling data available from the previous owner, Pennzoil, for this facility. The current WV/NPDES permit for the site, WV0111457, Multi-Sector General Permit For Storm Water Associated With Industrial Activity In West Virginia, does not require storm water sampling.

There is the potential for storm water to be impacted by the following: benzene, toluene, ethylbenzene, total xylenes and lead. These are potential pollutants due to historical operation of the facility as a bulk petroleum storage facility by Pennzoil. Pennzoil is entering into the Voluntary Remediation Program with the WVDEP. However, there is no evidence at this time that the aforementioned parameters are impacting the site.

### **3.6 Site Evaluation Summary**

Based on the assessment of the facility, a potential for storm water contamination is associated with spills or leaks, which may occur during the transfer or storage of materials at the facility. The activities with the potential to impact storm water include the following:

- a. Spills during tank truck loading.

Spills while loading are prevented by carefully defined procedures, including measurements of products in all tanks prior to the delivery and any unusual delivery procedures are spelled out on the driver route card for each location.

- b. Unloading of bulk products from barges.

These spills are primarily operating errors and are prevented by constant operating surveillance by terminal plantmen and the crew of the barges. Careful advance planning of all pumping operating during barge unloading is very important in this operation as well as the prevention of overfilling of storage tanks.

- c. Overfill of Storage Tanks.

*TANKS FITTED WITH OVERFILL ALARMS*

Storage tank product levels are indicated by a float gauge on the outside of all tanks. These tank gauges are inspected regularly for accuracy. Careful advance planning of all pumping operations is a must to prevent overfilling. Constant diligence during "topping off" of tanks is a must and this includes good communications.

- e. Storage tank rupture.

This contingency has been considered in the design and construction of all tanks. All tanks are constructed with API standard reinforcing. All storage tanks are routinely inspected (visual) for soundness. The concrete block dike walls are capable of containing the total of the total of the largest tank inside the dike.

- f. Petroleum product tanks

Two 275-gallon above ground storage tanks (ASTs) and two 55-gallon drums are located inside the garage/storage building. One AST contains kerosene for a heater and the other AST contains diesel fuel for the emergency generator for the fire suppression system. The 55-gallon drums also contain kerosene for the heater. The ASTs will be diked to contain a spill at least equal to the maximum content of each AST.

## **SECTION 4 – BEST MANAGEMENT PRACTICES**

### **4.1 Good Housekeeping**

The facility will be maintained in order to allow maximum efficiency of operation. This will include the following: 1) removal of all debris and non-essential equipment from around the dock area, pipelines for transferring product leading from the dock to the AST field and from the product loading racks 2) implement careful material storage practices 3) maintain up-to-date inventory 4) schedule routine cleanup operations 5) maintain well organized work areas and 6) train employees about good housekeeping practices.

### **4.2 Preventive Maintenance**

Material is transferred from the barges by two (2) 6-inch diameter pipes. A hydrostatic test on the lines was performed prior to transferring material from the barges to the ASTs onsite. The transfer piping will be hydrostatically tested on an annual basis.

Pumps, valves or hoses handle all the bulk products at the terminal and, therefore, are subject to frequent inspection and constant operating surveillance by all plantmen. Pump and valve maintenance is routine and leaks and spills are effectively prevented by training and supervision, as well as the design of the equipment.

Day-to-day maintenance activities are performed on valves, lines and tanks in order to ensure that each tank and its components are in proper working order. During valve maintenance or piping repair, the individual valve or section of pipe is isolated. Residual material is drained into container and then transferred into a mixed product tank or a bulk storage tank.

### **4.3 Visual Inspections**

Facility employees perform regular inspections of facility equipment to insure that it is in working order and may perform minor repairs on piping/valves/pumps as needed to correct potential leaks/drips.

All aboveground piping and ancillary equipment will be inspected at least annually in accordance with this SWPPP plan. These inspections are performed to detect areas that have the potential for a release. For information regarding inspections see **Section 6.1** of this plan.

### **4.4 Spill Prevention and Response**

A detailed review of known possible potential occurrences of a discharge of pollution into sewers and the river has been made by experienced and responsible personnel of the Etowah River Terminal. The principle hazards in the terminal operations are: (1) the

possibility of spills during loading of tank trucks; (2) overfilling storage tanks; (3) the failure of storage tanks; (4) unloading of bulk products from barges on the river; and (5) hose, valve or pump failures.

A stationary discharge collection system, holding approximately 275 gallons is provided for the hose connection on the float at the dock, for barge unloading. The collection tank will be available to collect residual product in the hose connection upon completion of product transfer and to contain spills, which may occur at the dock area. Material collected in this containment equipment is to be pumped back into the barge with the pump provided. The barge is equipped with discharge containment equipment for use when disconnecting the hose from the barge manifold. Any drips or drainage from the hose is to be contained in this equipment. Any barge content in the barge collection equipment is to be drained into a barge compartment at the conclusion of the operation.

Any temporary connection made to accomplish the transfer should have a portable catchment in place under the connection prior to transfer.

In transfer of barge content from the barge to the terminal, emergency shutdown would be automatic by the use of a check valve that is installed in the line at the dock area.

Available in the event barge content should get into the river during the transfer are absorbent socks and absorbent pads. The absorbent socks and pads are stored in a metal building, which is located at the Terminal. If barge content should get into the river, absorbent pads will be used to absorb any of the spilled material, which remains on the water surface. Because the glycols and calcium chloride solution are water soluble, those spills will have a very small amount on the water surface. Small spills will be contained as safely as possible with existing equipment. Large spills will necessitate calling Weavertown Environmental Group to aid in containment and cleanup. Deployment of terminal personnel will be less than one half hour.

Spills, which occur to the ground, shall have the free liquid portion of the spill contained and free liquid removed as soon as the spill is discovered and proper containment equipment and personnel, can be assembled. Free liquid removed from the site will be recycled or properly disposed. Spills, which are absorbed into the soil, will be evaluated as to the extent and impact of the spill on soil, groundwater and surface water. Those spills will be remediated as necessary and in a timely manner in accordance with normal industry standards.

#### **4.5 Sediment Erosion and Control**

Two storm drains are located at the Terminal. Storm water is collected in a sump inside the terminal fence, near the northwest corner of the warehouse/office building. A second storm drain is located in the southwest portion of the Terminal. The second drain collects storm water from inside the fenced, asphalt-covered portion, of the Terminal. Both storm drains are piped outside the fenced Terminal and discharge to a grassy bank and then into the Elk River.

As currently designed the facility has two 500-gallon sumps, which act as the storm water collection/drainage system in the storage tank farm designated as dike 1. The second diked tank farm contains no sumps for storm water collection; accumulated storm water is drained from dike 2 by valves into dike 1, as needed, to remove this liquid. The two 500-gallon sumps currently drain by gravity to a junction box, which then discharges to an oil/water separator system, which then discharges to surface waters. This system will be evaluated and altered to prevent the automatic discharge of storm water from the diked tank farm, through the oil/water separator, to the Elk River. The oil/water separator was installed many years ago, when the facility was used as a petroleum products storage facility and petroleum products were the pollutants of concern at the facility. The oil/water separator will not remove the glycols and other de-icing agents currently stored at the site.

#### **4.6 Management of Runoff**

Storm water runoff originates from two areas within the Terminal as noted on the Terminal Diagram included in Section 3. Drainage area #1 is approximately 47,417 square feet and encompasses the area within the diked storage tank farm. The surface area within drainage area #1 consists of ASTs, gravel and soil, and concrete. Storm water from this area discharges as identified in Section 4.5 of this Plan.

Drainage area #2 is approximately 106,410 square feet and encompasses the fenced area of the Terminal, which includes the product loading racks, garage/storage building, warehouse office building, asphalt paved driving and parking areas and grassy areas along the fence line. Storm water from this area drains to two sumps located on the west side of the terminal. Storm water is piped from the sumps to a grassy area before entering the Elk River.

A grassy strip is located between the fenced area of the terminal and the Elk River. The grassy strip is approximately 100 feet wide, except for a gravel road leading from the fenced portion of the terminal to the barge unloading dock on the Elk River. The grassy strip acts as a sediment control measure for storm water coming from the Terminal.

## **SECTION 5 – IMPLEMENTATION**

Implementation of the SWPPP includes the implementation of appropriate controls identified in Section 4, Best Management Practices, and employee training.

### **5.1 Implementing Controls**

All controls for managing storm water are currently in place. Therefore, the storm water prevention team is responsible for maintaining these controls.

### **5.2 Employee Training**

The goal of the employee-training program is to teach personnel the components and goals of the storm water pollution prevention plan. New operations personnel (non-clerical) employees will be trained initially and other operations employees will be trained annually. The training will cover topics such as spill prevention and response, good housekeeping, and material management practices.

## 6.0 – SWPPP EVALUATION

The SWPPP must be kept up to date by regularly evaluating the information you collected in the Assessment Phase (Section 3 of this Plan) and the controls selected in the Plan Design Phase (Section 4 of this Plan). Specifically, you must (A) conduct site evaluations, (B) keep records of all inspections and reports, and (C) revise the SWPPP as needed.

### 6.1 Annual Site Compliance Evaluation

Qualified personnel must conduct site compliance evaluations annually. The following is required as part of the evaluation:

- Inspect storm water drainage areas for evidence of pollutants entering the drainage system.
- Evaluate the effectiveness of BMPs (for example, is your site cleaner? Are your employees more familiar with good housekeeping measures and spill prevention and response practices?).
- Observe structural measures, sediment controls, and other storm water BMPs to ensure proper operation.
- Revise the plan as needed within 2 weeks of inspection, and implement any necessary changes within 12 weeks of inspection.
- **Prepare a report** summarizing inspection results and follow-up actions, identifying the date of inspection and personnel who conducted the inspection.
- **Sign the report** and keep it with the plan.

### 6.2 Record Keeping

Records must be maintained for all spills, leaks, inspections and maintenance activities for at least one year after the permit expires. For spills and leaks, records should include information such as the date and time of the incident, weather conditions, cause, and resulting environmental problems.

### 6.3 Plan Revisions

The plan must be revised for any major changes in the facility's design, construction, operation or maintenance or if the revisions are required based on the annual inspection. The SWPPP must be revised within two weeks of the inspection.

**SECTION 7 – REQUIRED SIGNATURE**

THIS PLAN IS ACCEPTED BY MANAGEMENT

ETOWAH RIVER TERMINAL LLC

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

# CTL Engineering of WV, Inc.

Consulting Engineers • Testing •  
Inspection Services • Analytical Laboratories  
Environmental Consulting

510 C Street  
S. Charleston, WV 25303

(304) 746-1140  
(304) 746-1143 Fax

DATE: 2/15/02 TIME: \_\_\_\_\_ FAX #: 345-0968

ATTN: John Hutchinson

COMPANY: Etoxah

FROM: Bill Chambers

We are transmitting 9 pages including this cover page. If transmission is incomplete, please contact \_\_\_\_\_ at 304/746-1140.

## COMMENTS:

John

These are the Worksheets that go with the SWPPP that I left with you earlier today.

Take a close look at the Terminal Diagram (map). Based on our conversations, I believe Discharge #2 should be moved from beside the firehouse on the southwest end of the property to beside the abandoned firehouse pump on the northwest end of the property. If so, hand draw location on map & fax back to me along with any other comments you have.

Keep a copy of everything I give/send you to show in case

**VISIT OUR HOME PAGE! [www.ctleng.com](http://www.ctleng.com)**  
you would get a visit/inspection from a regulatory agency.  
Offices: Ohio, West Virginia, North Carolina, Indiana

Thanks for the other info you provided me!  
Bill

**POLLUTION PREVENTION TEAM  
Etowah River Terminal**

**MEMBER ROSTER**

Worksheet #1

Completed by: Bill Chambers

Title: Consultant

Date: February 14, 2002

Leader: John Hutchinson

Title: Terminal Manager

Office Phone: 304-345-0967

**Responsibilities:**

Implementing all general permit and pollution prevention plan requirements.

Defining and agreeing upon an appropriate set of goals for the facility's storm water management program. Being aware of any changes that are made in plant operations to determine whether any changes must be made to the Storm Water Pollution Prevention Plan. Maintaining a clear line of communication with plant management to ensure a cooperative partnership.

**Members:**

(1) Larry Ryder

Title: Laborer

Office Phone: 304-345-0967

**Responsibilities:**

Unloading barges and maintaining aboveground storage tanks, general terminal maintenance and responding to small spills.

(2) Kenny Quinn

Title: Laborer

Office Phone: 304-345-0967

**Responsibilities:**

Unloading barges and maintaining aboveground storage tanks, general terminal maintenance and responding to small spills.

(3) \_\_\_\_\_

Title: \_\_\_\_\_

Office Phone: \_\_\_\_\_

**Responsibilities:**

**NON-STORM WATER DISCHARGE ASSESSMENT AND  
FAILURE TO CERTIFY NOTIFICATION**

Worksheet # \_\_\_\_\_  
Completed by \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

Directions: If you cannot feasibly test or evaluate an outfall, fill in the table below with the appropriate information and sign this form to certify the accuracy of the included information.

List all outfalls not tested or evaluated, describe any potential sources of non-storm water pollution from listed outfalls, and state the reason(s) why certification is not possible. Use the key from your site map to identify each outfall.

**Important Notice: A copy of this notification must be signed and submitted to the Director within 180 days of the effective date of this permit.**

| Identify Outfall Not Tested/Evaluated | Description of Why Certification Is Infeasible | Description of Potential Sources of Non-Storm Water Pollution |
|---------------------------------------|--|---|
|                                       |  |   |
|                                       |  |   |
|                                       |  |   |
|                                       |  |   |
|                                       |  |   |

**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 ensure 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, and that such notification has been made to the Director within 180 days of \_\_\_\_\_ (date permit was issued), the effective date of this permit.

A. Name & Official Title (type or print)

B. Area Code and Telephone No.

C. Signature

D. Date Signed

**NON-STORM WATER DISCHARGE  
ASSESSMENT AND CERTIFICATION**

Worksheet #5  
Completed by:  
Title:  
Date:

| Date of Test or Evaluation | Outfall Directly Observed During the Test (identify as indicated on the site map) | Method Used to Test or Evaluate Discharge | Describe Results from Test for the Presence of Non-Storm Water Discharge | Identify Potential Significant Sources | Name of Person Who Conducted the Test or Evaluation |
|----------------------------|---|---|--|--|---|
|                            |   |   |  |  |   |
|                            |   |   |  |  |   |
|                            |   |   |  |  |   |
|                            |   |   |  |  |   |
|                            |   |   |  |  |   |
|                            |   |   |  |  |   |

**CERTIFICATION**

I, \_\_\_\_\_ (responsible corporate official), 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.

A. Name & Official Title (type or print)

B. Area Code and Telephone No.

C. Signature

D. Date Signed





**MATERIAL INVENTORY**

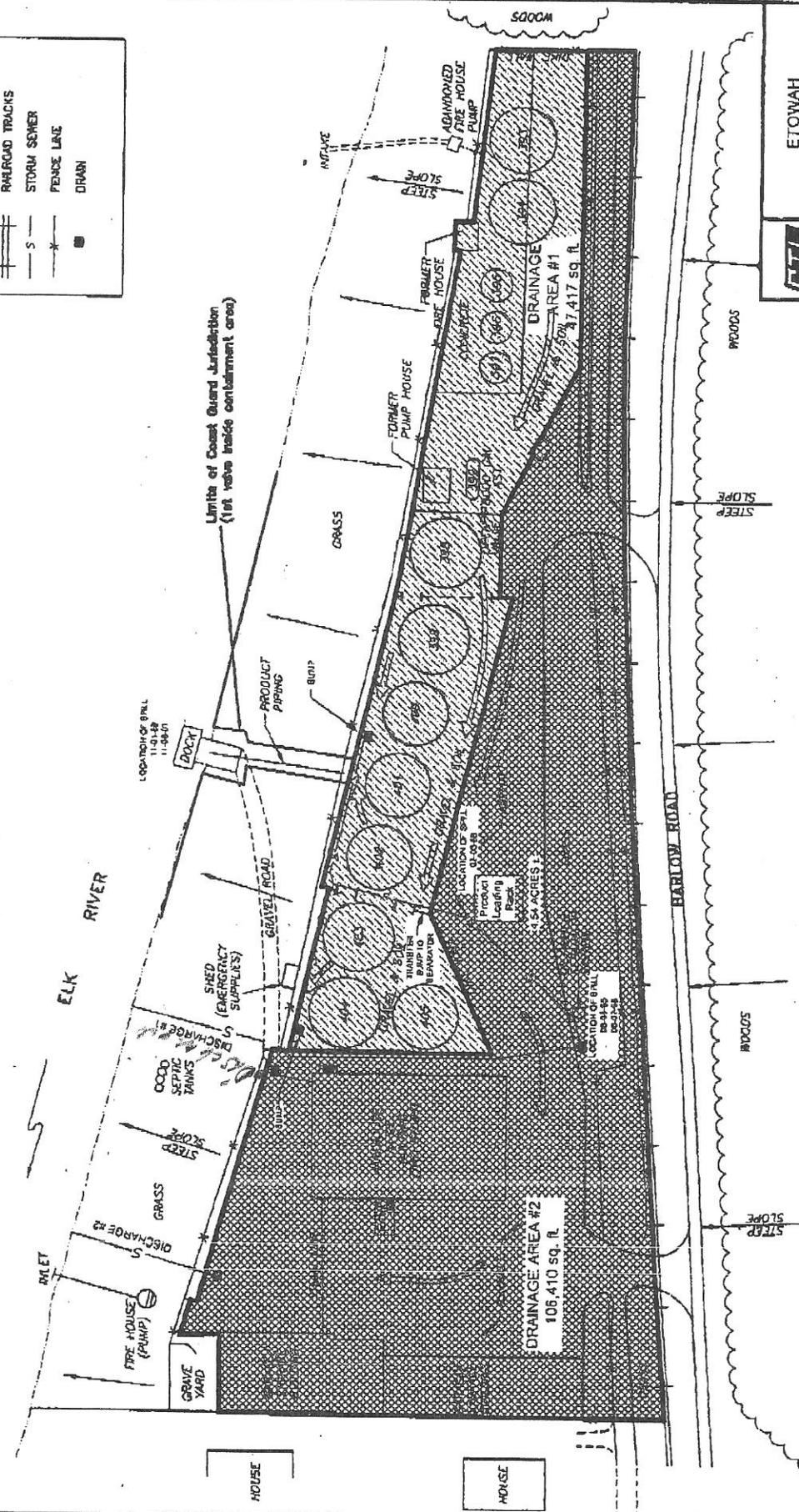
Worksheet #3  
 Completed by: Bill Chambers  
 Title: Consultant  
 Date: February 14, 2002

Instructions: List all materials used, stored, or produced onsite. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff. Also complete Worksheet 3A if the material has been exposed during the last 3 years.

| Material          | Purpose/Location   | Quantity (gallons) |          |         | Quantity Exposed in Last 3 Years | Likelihood of contact with storm water. If yes, describe reason. | Past Significant Spill or Leak |    |
|-------------------|--------------------|--------------------|----------|---------|----------------------------------|--|--------------------------------|----|
|                   |                    | Used               | Produced | Stored  |                                  |  | Yes                            | No |
| Diethylene glycol | Product/tank farm  | none               | none     | 152,000 | none                             | very low   |                                | XX |
| PDO - Geismar     | Product/tank farm  | none               | none     | 222,000 | none                             | very low   |                                | XX |
| Calcium chloride  | Product/tank farm  | none               | none     | 300,000 | none                             | very low   |                                | XX |
| Propylene glycol  | Product/tank farm  | none               | none     | -0-     | none                             | very low   |                                | XX |
| FCA - 1000        | Product/tank farm  | none               | none     | 290,000 | none                             | very low   |                                | XX |
| FCA - 2000        | Product/tank farm  | none               | none     | 200,000 | none                             | very low   |                                | XX |
| Kerosene          | Heating/garage     | 1,000              | none     | 385     | 3 gallons                        | very low   |                                | XX |
| Diesel Fuel       | Emerg. gen./garage | 25                 | none     | 275     | none                             | very low   |                                | XX |
|                   |                    |                    |          |         |                                  |  |                                |    |
|                   |                    |                    |          |         |                                  |  |                                |    |
|                   |                    |                    |          |         |                                  |  |                                |    |
|                   |                    |                    |          |         |                                  |  |                                |    |
|                   |                    |                    |          |         |                                  |  |                                |    |
|                   |                    |                    |          |         |                                  |  |                                |    |

**LEGEND:**

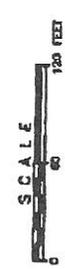
- SURFACE WATER FLOW
- RAILROAD TRACKS
- STORM SEWER
- FENCE LINE
- DRAIN



**GTL**

**ETOWAH TERMINAL**

ETOWAH Terminal  
1015 Barlow Road  
Charleston, West Virginia



## DEVELOPING A SITE MAP

Worksheet #2  
Completed by: Bill Chambers  
Title: Consultant  
Date: February 14, 2002

Instructions: Draw a map of your site including a footprint of all buildings, structures, paved areas, and parking lots. The information below describes additional elements required by EPA's General Permit.

EPA's General Permit requires that you indicate the following features on your site map:

- All outfalls and storm water discharges
- Drainage areas of each storm water outfall
- Structural storm water pollution control measures, such as:
  - Flow diversion structures
  - Retention/detention ponds
  - Vegetative swales
  - Sediment traps
- Name of receiving waters (or if through a Municipal Separate Storm Sewer System)
- Locations of exposed significant materials
- Locations of past spills and leaks
- Locations of high-risk, waste-generating areas and activities common on industrial sites such as:
  - Fueling stations
  - Vehicle/equipment washing and maintenance areas
  - Area for unloading/loading materials
  - Above-ground tanks for liquid storage
  - Industrial waste management areas (landfills, waste piles, treatment plants, disposal areas)
  - Outside storage areas for raw materials, by-products, and finished products
  - Outside manufacturing areas
  - Other areas of concern (specify: \_\_\_\_\_)