#### Long Term Pollution Prevention Plan

In support of its efforts to re-pave the area in front of Building 1, Nye Lubricants, Inc (Nye) is also installing a series of stormwater Best Management Practices (BMPs) to provide water quality treatment from the runoff from parking area as well as promote recharge and protect the neighboring wetland resource areas. While Nye will be implementing provisions of their Operations and Maintenance plan for those stormwater BMPs, the are also providing this Long-Term Pollution Prevention Plan to enhance and protect water quality from their operations on site. Note: the Nye property is much larger than the project area in front of Building 1, so this plan will be focused on the project area mostly but may reference activities and locations outside of the project area but still part of the Nye campus.

#### Contacts

The Nye personnel responsible for implementing this Long-Term Pollution Prevention Plan are:

Patrick F. Norton
Regulatory Affairs Specialist
pnorton@nyelubricants.com
508-996-6721

Martin J. Weinstein
Director of Quality, Engineering, EHS
<a href="mailto:mweinstein@nyelubricants.com">mweinstein@nyelubricants.com</a>
508-996-6721

# **Routine Inspections**

Routine inspections for the stormwater BMPs will occur as dictated in the Operations and Maintenance plan for the Building 1 Parking Area Stormwater BMPs. Routine inspections for material storage and environmental controls are covered by the Spill Prevention Control and Countermeasure Plan, prepared by Woodard and Curran, dated December 4, 2017.

### **Vehicle Washing Controls**

There is no -onsite washing of vehicles, and any maintenance done to vehicles is performed within Building 3.

#### Spill Prevention

Nye's spill prevention procedures and activities are described and covered in its Spill Prevention Control and Countermeasure Plan, prepared by Woodard and Curran, dated December 4, 2017.

## **Material Storage**

Nye's management and control of storage of hazardous materials on site are described and covered in its Spill Prevention Control and Countermeasure Plan, prepared by Woodard and Curran, dated December 4, 2017.

# Maintenance of Landscaped Areas

Nye employs a maintenance staff that handles day to day maintenance of the grounds. In addition, Nye has a Landscaper under contract, who visits the site once or twice per week as needed to maintain the grounds. Nye is committed to having a cleaning landscaped grounds.

## Fertilizers, Herbicides and Pesticides

The use of fertilizers, herbicides and pesticides is on a limited basis and performed by its landscaping subcontractor. Application of these materials is not done within 48 of a forecasted storm event.

# Pet waste management

There are typically no pets on the grounds at Nye, however if a passerby walking a pet leaves waste unattended, one of Nye's maintenance staff will remove and properly dispose of the waste.

# Septic System Management

The Nye facility on Howland Road is serviced the municipal Publicly Owned Treatment Works in the Town of Fairhaven and therefor there is no Septic System management required.

## Solid Waste Management

The primary solid waste management is performed behind Building 3, where their trash dumpsters as well as recycling facilities. There is a trash compactor on southern side of Building 1 in the project, on a concrete pad. Nye takes care to maintain and keep clean the areas surrounding these items.

# Snow Disposal and Plowing Plans

During winter storm events, snow is typically removed by plowing from the parking areas and stockpiled on site. No stockpile of snow will be allowed on top of the stormwater BMPs being implemented as part of this project.

#### Salt

Pet friendly salt is used for the paved areas where walking and parking activities occur to ensure safe conditions for workers and visitors at Nye.

## **Street Sweeping**

Nye has an on-site street sweeper which is used for the seashells continually dropped on the parking areas by birds in the area. The street sweeping proceeds are collected and properly disposed.

### Illicit Discharges

Nye has already implemented a program to inspect and remove illicit discharges and provided an Illicit Discharge statement with the Notice of Intent filing for the Building 1 Re-paving project. Nye will continue to monitor for and prohibit illicit discharges for its facility.

#### Training for Staff or Personnel

Nye will continue to oversee and implement this plan, which will include training and educate of maintenance staff and subcontractors, such as landscapers working on the grounds. Training is also included in its Spill Prevention Control and Countermeasure Plan, prepared by Woodard and Curran, dated December 4, 2017.