General Shale
Building The American Dream®

March 25, 2025

Water Section Manager
San Antonio Regional Office
Texas Commission on Environmental Quality
14250 Judson Road
San Antonio, TX 78233

Re: General Shale Brick – Ogden Facility
Agreed Order Docket No. 2024-1539-EAQ-E
Edwards Aquifer Protection Plan
AST Facility Plan Application NOD

Dear Section Manager:

In response to the Notice of Deficiency emailed dated March 24, 2025, the revisions listed below have been made to the enclosed above referenced application.

- Addition of General Information Form w/Attachments
- Addition of Temporary Stormwater Section Form w/Attachments
- Addition of Core Data Form
- Removal of Scanned Check from Application Fee Form

Please feel free to contact me at (803) 394-2128 or at joseph.williams@generalshale.com should you have any questions concerning the information provided.

Sincerely,

Joseph Williams

Joseph Williams
Environmental Engineer

enclosure

Texas Commission on Environmental Quality

Edwards Aquifer Application Cover Page

Our Review of Your Application

The Edwards Aquifer Program staff conducts an administrative and technical review of all applications. The turnaround time for administrative review can be up to 30 days as outlined in 30 TAC 213.4(e). Generally administrative completeness is determined during the intake meeting or within a few days of receipt. The turnaround time for technical review of an administratively complete Edwards Aquifer application is 90 days as outlined in 30 TAC 213.4(e). Please know that the review and approval time is directly impacted by the quality and completeness of the initial application that is received. In order to conduct a timely review, it is imperative that the information provided in an Edwards Aquifer application include final plans, be accurate, complete, and in compliance with 30 TAC 213.

Administrative Review

1. Edwards Aquifer applications must be deemed administratively complete before a technical review can begin. To be considered administratively complete, the application must contain completed forms and attachments, provide the requested information, and meet all the site plan requirements. The submitted application and plan sheets should be final plans. Please submit one full-size set of plan sheets with the original application, and half-size sets with the additional copies.

   To ensure that all applicable documents are included in the application, the program has developed tools to guide you and web pages to provide all forms, checklists, and guidance. Please visit the below website for assistance: http://www.tceq.texas.gov/field/eapp.

2. This Edwards Aquifer Application Cover Page form (certified by the applicant or agent) must be included in the application and brought to the administrative review meeting.

3. Administrative reviews are scheduled with program staff who will conduct the review. Applicants or their authorized agent should call the appropriate regional office, according to the county in which the project is located, to schedule a review. The average meeting time is one hour.

4. In the meeting, the application is examined for administrative completeness. Deficiencies will be noted by staff and emailed or faxed to the applicant and authorized agent at the end of the meeting, or shortly after. Administrative deficiencies will cause the application to be deemed incomplete and returned.

   An appointment should be made to resubmit the application. The application is re-examined to ensure all deficiencies are resolved. The application will only be deemed administratively complete when all administrative deficiencies are addressed.

5. If an application is received by mail, courier service, or otherwise submitted without a review meeting, the administrative review will be conducted within 30 days. The applicant and agent will be contacted with the results of the administrative review. If the application is found to be administratively incomplete, it can be retrieved from the regional office or returned by regular mail. If returned by mail, the regional office may require arrangements for return shipping.

6. If the geologic assessment was completed before October 1, 2004 and the site contains "possibly sensitive" features, the assessment must be updated in accordance with the *Instructions to Geologists* (TCEQ-0585 Instructions).

Technical Review

1. When an application is deemed administratively complete, the technical review period begins. The regional office will distribute copies of the application to the identified affected city, county, and groundwater conservation district whose jurisdiction includes the subject site. These entities and the public have 30 days to provide comments on the application to the regional office. All comments received are reviewed by TCEQ.

2. A site assessment is usually conducted as part of the technical review, to evaluate the geologic assessment and observe existing site conditions. The site must be accessible to our staff. The site boundaries should be

clearly marked, features identified in the geologic assessment should be flagged, roadways marked and the alignment of the Sewage Collection System and manholes should be staked at the time the application is submitted. If the site is not marked the application may be returned.

3. We evaluate the application for technical completeness and contact the applicant and agent via Notice of Deficiency (NOD) to request additional information and identify technical deficiencies. There are two deficiency response periods available to the applicant. There are 14 days to resolve deficiencies noted in the first NOD. If a second NOD is issued, there is an additional 14 days to resolve deficiencies. If the response to the second notice is not received, is incomplete or inadequate, or provides new information that is incomplete or inadequate, the application must be withdrawn or will be denied. Please note that because the technical review is underway, whether the application is withdrawn or denied **the application fee will be forfeited**.

4. The program has 90 calendar days to complete the technical review of the application. If the application is technically adequate, such that it complies with the Edwards Aquifer rules, and is protective of the Edwards Aquifer during and after construction, an approval letter will be issued. Construction or other regulated activity may not begin until an approval is issued.

Mid-Review Modifications

It is important to have final site plans prior to beginning the permitting process with TCEQ to avoid delays.

Occasionally, circumstances arise where you may have significant design and/or site plan changes after your Edwards Aquifer application has been deemed administratively complete by TCEQ. This is considered a "Mid-Review Modification". Mid-Review Modifications may require redistribution of an application that includes the proposed modifications for public comment.

If you are proposing a Mid-Review Modification, two options are available:

- If the technical review has begun your application can be denied/withdrawn, your fees will be forfeited, and the plan will have to be resubmitted.
- TCEQ can continue the technical review of the application as it was submitted, and a modification application can be submitted at a later time.

If the application is denied/withdrawn, the resubmitted application will be subject to the administrative and technical review processes and will be treated as a new application. The application will be redistributed to the affected jurisdictions.

Please contact the regional office if you have questions. If your project is located in Williamson, Travis, or Hays County, contact TCEQ's Austin Regional Office at 512-339-2929. If your project is in Comal, Bexar, Medina, Uvalde, or Kinney County, contact TCEQ's San Antonio Regional Office at 210-490-3096

Please fill out all required fields below and submit with your application.

1. Regulated Entity Name: General Shale Brick, Inc. dba Red River Brick - Ogden Facility						**2. Regulated Entity No.:** RN100851377			
3. Customer Name: General Shale Brick, Inc.						**4. Customer No.:** CN606231090			
5. Project Type: **(Please circle/check one)**	New		Modification			Extension		Exception	
6. Plan Type: **(Please circle/check one)**	WPAP	CZP	SCS	UST	(AST)	EXP	EXT	Technical Clarification	Optional Enhanced Measures
7. Land Use: **(Please circle/check one)**	Residential		Non-residential			**8. Site (acres):**		33 acres	
9. Application Fee:	$650.00		**10. Permanent BMP(s):**			secondary containment, housekeeping, drainage controls, sediment pond			
11. SCS (Linear Ft.):	N/A		**12. AST/UST (No. Tanks):**			1			
13. County:	Comal		**14. Watershed:**			Segment 1811A UT to Dry Comal Creek to Comal River			

Application Distribution

Instructions: Use the table below to determine the number of applications required. One original and one copy of the application, plus additional copies (as needed) for each affected incorporated city, county, and groundwater conservation district are required. Linear projects or large projects, which cross into multiple jurisdictions, can require additional copies. Refer to the "Texas Groundwater Conservation Districts within the EAPP Boundaries" map found at:

http://www.tceq.texas.gov/assets/public/compliance/field_ops/eapp/EAPP%20GWCD%20map.pdf

For more detailed boundaries, please contact the conservation district directly.

Austin Region			
County:	**Hays**	**Travis**	**Williamson**
Original (1 req.)	___	___	___
Region (1 req.)	___	___	___
County(ies)	___	___	___
Groundwater Conservation District(s)	___Edwards Aquifer Authority ___Barton Springs/ Edwards Aquifer ___Hays Trinity ___Plum Creek	___Barton Springs/ Edwards Aquifer	NA
City(ies) Jurisdiction	___Austin ___Buda ___Dripping Springs ___Kyle ___Mountain City ___San Marcos ___Wimberley ___Woodcreek	___Austin ___Bee Cave ___Pflugerville ___Rollingwood ___Round Rock ___Sunset Valley ___West Lake Hills	___Austin ___Cedar Park ___Florence ___Georgetown ___Jerrell ___Leander ___Liberty Hill ___Pflugerville ___Round Rock

San Antonio Region					
County:	**Bexar**	**Comal**	**Kinney**	**Medina**	**Uvalde**
Original (1 req.)	___	___	___	___	___
Region (1 req.)	___	___	___	___	___
County(ies)	___	___	___	___	___
Groundwater Conservation District(s)	___ Edwards Aquifer Authority ___Trinity-Glen Rose	X Edwards Aquifer Authority	___Kinney	___EAA ___Medina	___EAA ___Uvalde
City(ies) Jurisdiction	___Castle Hills ___Fair Oaks Ranch ___Helotes ___Hill Country Village ___Hollywood Park ___San Antonio (SAWS) ___Shavano Park	___Bulverde ___Fair Oaks Ranch ___Garden Ridge ___New Braunfels X Schertz	NA	___San Antonio ETJ (SAWS)	NA

I certify that to the best of my knowledge, that the application is complete and accurate. This application is hereby submitted to TCEQ for administrative review and technical review.
J. David McKeown
Print Name of Customer/Authorized Agent
J. D McL 03/04/2025
Signature of Customer/Authorized Agent Date

FOR TCEQ INTERNAL USE ONLY				
Date(s)Reviewed:		Date Administratively Complete:		
Received From:		Correct Number of Copies:		
Received By:		Distribution Date:		
EAPP File Number:		Complex:		
Admin. Review(s) (No.):		No. AR Rounds:		
Delinquent Fees (Y/N):		Review Time Spent:		
Lat./Long. Verified:		SOS Customer Verification:		
Agent Authorization Complete/Notarized (Y/N):		Fee Check:	Payable to TCEQ (Y/N):	
Core Data Form Complete (Y/N):			Signed (Y/N):	
Core Data Form Incomplete Nos.:			Less than 90 days old (Y/N):	

Application Fee Form

Texas Commission on Environmental Quality

Name of Proposed Regulated Entity: General Shale Brick, Inc. dba Red River Brick - Ogden Facility

Regulated Entity Location: 21455 FM 2252, Schertz, TX 78154

Name of Customer: General Shale Brick, Inc.

Contact Person: J. David McKeown Phone: (803) 691-3121

Customer Reference Number (if issued):CN 606231090

Regulated Entity Reference Number (if issued):RN 100851377

Austin Regional Office (3373)

☐ Hays ☐ Travis ☐ Williamson

San Antonio Regional Office (3362)

☐ Bexar ☐ Medina ☐ Uvalde

☒ Comal ☐ Kinney

Application fees must be paid by check, certified check, or money order, payable to the **Texas Commission on Environmental Quality**. Your canceled check will serve as your receipt. **This form must be submitted with your fee payment**. This payment is being submitted to:

☐ Austin Regional Office

☐ Mailed to: TCEQ - Cashier
Revenues Section
Mail Code 214
P.O. Box 13088
Austin, TX 78711-3088

☐ San Antonio Regional Office

☒ Overnight Delivery to: TCEQ - Cashier
12100 Park 35 Circle
Building A, 3rd Floor
Austin, TX 78753
(512)239-0357

Site Location (Check All That Apply):

☐ Recharge Zone ☐ Contributing Zone ☒ Transition Zone

Type of Plan	***Size***	***Fee Due***
Water Pollution Abatement Plan, Contributing Zone Plan: One Single Family Residential Dwelling	Acres	$
Water Pollution Abatement Plan, Contributing Zone Plan: Multiple Single Family Residential and Parks	Acres	$
Water Pollution Abatement Plan, Contributing Zone Plan: Non-residential	Acres	$
Sewage Collection System	L.F.	$
Lift Stations without sewer lines	Acres	$
Underground or Aboveground Storage Tank Facility	1 Tanks	$650.00
Piping System(s)(only)	Each	$
Exception	Each	$
Extension of Time	Each	$

Signature: J. D ML Date: 03/04/2025

Application Fee Schedule

Texas Commission on Environmental Quality
Edwards Aquifer Protection Program 30 TAC Chapter 213 (effective 05/01/2008)

Water Pollution Abatement Plans and Modifications

Contributing Zone Plans and Modifications

Project	*Project Area in Acres*	*Fee*
One Single Family Residential Dwelling	< 5	$650
Multiple Single Family Residential and Parks	< 5 5 < 10 10 < 40 40 < 100 100 < 500 ≥ 500	$1,500 $3,000 $4,000 $6,500 $8,000 $10,000
Non-residential (Commercial, industrial, institutional, multi-family residential, schools, and other sites where regulated activities will occur)	< 1 1 < 5 5 < 10 10 < 40 40 < 100 ≥ 100	$3,000 $4,000 $5,000 $6,500 $8,000 $10,000

Organized Sewage Collection Systems and Modifications

Project	*Cost per Linear Foot*	*Minimum Fee-Maximum Fee*
Sewage Collection Systems	$0.50	$650 - $6,500

Underground and Aboveground Storage Tank System Facility Plans and Modifications

Project	*Cost per Tank or Piping System*	*Minimum Fee-Maximum Fee*
Underground and Aboveground Storage Tank Facility	$650	$650 - $6,500

Exception Requests

Project	*Fee*
Exception Request	$500

Extension of Time Requests

Project	*Fee*
Extension of Time Request	$150

General Information Form

Texas Commission on Environmental Quality

For Regulated Activities on the Edwards Aquifer Recharge and Transition Zones and Relating to 30 TAC §213.4(b) & §213.5(b)(2)(A), (B) Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **General Information Form** is hereby submitted for TCEQ review. The application was prepared by:

Print Name of Customer/Agent: J. David McKeown

Date: March 25, 2025

Signature of Customer/Agent:

Project Information

1. Regulated Entity Name: General Shale Brick, Inc. dba Red River Brick - Ogden Facility
2. County: Comal
3. Stream Basin: Segment 1811A UT to Dry Comal Creek to Comal River
4. Groundwater Conservation District (If applicable): _____
5. Edwards Aquifer Zone:

   ☐ Recharge Zone
   ☒ Transition Zone

6. Plan Type:

   ☐ WPAP
   ☐ SCS
   ☐ Modification
   ☒ AST
   ☐ UST
   ☐ Exception Request

7. Customer (Applicant):

   Contact Person: Jerry Kesterson
   Entity: General Shale Brick, Inc. dba Red River Brick - Ogden Facility
   Mailing Address: 21455 FM 2252
   City, State: Schertz, TX Zip: 78154
   Telephone: (830) 620-5440 FAX: _____
   Email Address: jerry.kesterson@redriverbrick.com

8. Agent/Representative (If any):

   Contact Person: J. David McKeown
   Entity: General Shale Brick, Inc.
   Mailing Address: 5100 Brickyard Road
   City, State: Columbia, SC Zip: 29203
   Telephone: (803) 691-3121 FAX: _____
   Email Address: david.mckeown@generalshale.com

9. Project Location:

   ☐ The project site is located inside the city limits of _____.
   ☐ The project site is located outside the city limits but inside the ETJ (extra-territorial jurisdiction) of _____.
   ☒ The project site is not located within any city's limits or ETJ.

10. ☒ The location of the project site is described below. The description provides sufficient detail and clarity so that the TCEQ's Regional staff can easily locate the project and site boundaries for a field investigation.

    The Site address is listed as 21455 FM 2252 in Schertz, Comal County Texas. It is located approximately 1 mile northwest of Interstate 35. The lat/long coordinates of the site entrance are 29.629571°, -98.260782°

11. ☒ **Attachment A – Road Map**. A road map showing directions to and the location of the project site is attached. The project location and site boundaries are clearly shown on the map.

12. ☒ **Attachment B - USGS / Edwards Recharge Zone Map**. A copy of the official 7 ½ minute USGS Quadrangle Map (Scale: 1" = 2000') of the Edwards Recharge Zone is attached. The map(s) clearly show:

    ☒ Project site boundaries.
    ☒ USGS Quadrangle Name(s).
    ☒ Boundaries of the Recharge Zone (and Transition Zone, if applicable).
    ☒ Drainage path from the project site to the boundary of the Recharge Zone.

13. ☒ **The TCEQ must be able to inspect the project site or the application will be returned**. Sufficient survey staking is provided on the project to allow TCEQ regional staff to locate the boundaries and alignment of the regulated activities and the geologic or manmade features noted in the Geologic Assessment.

☒ Survey staking will be completed by this date: Site is already developed and boundaries are easily identified

14. ☒ **Attachment C – Project Description**. Attached at the end of this form is a detailed narrative description of the proposed project. The project description is consistent throughout the application and contains, at a minimum, the following details:

- ☒ Area of the site
- ☒ Offsite areas
- ☒ Impervious cover
- ☒ Permanent BMP(s)
- ☒ Proposed site use
- ☒ Site history
- ☒ Previous development
- ☒ Area(s) to be demolished

15. Existing project site conditions are noted below:

- ☐ Existing commercial site
- ☒ Existing industrial site
- ☐ Existing residential site
- ☒ Existing paved and/or unpaved roads
- ☐ Undeveloped (Cleared)
- ☐ Undeveloped (Undisturbed/Uncleared)
- ☐ Other: _____

Prohibited Activities

16. ☒ I am aware that the following activities are prohibited on the Recharge Zone and are not proposed for this project:

(1) Waste disposal wells regulated under 30 TAC Chapter 331 of this title (relating to Underground Injection Control);

(2) New feedlot/concentrated animal feeding operations, as defined in 30 TAC §213.3;

(3) Land disposal of Class I wastes, as defined in 30 TAC §335.1;

(4) The use of sewage holding tanks as parts of organized collection systems; and

(5) New municipal solid waste landfill facilities required to meet and comply with Type I standards which are defined in §330.41(b), (c), and (d) of this title (relating to Types of Municipal Solid Waste Facilities).

(6) New municipal and industrial wastewater discharges into or adjacent to water in the state that would create additional pollutant loading.

17. ☒ I am aware that the following activities are prohibited on the Transition Zone and are not proposed for this project:

(1) Waste disposal wells regulated under 30 TAC Chapter 331 (relating to Underground Injection Control);

(2) Land disposal of Class I wastes, as defined in 30 TAC §335.1; and

(3) New municipal solid waste landfill facilities required to meet and comply with Type I standards which are defined in §330.41 (b), (c), and (d) of this title.

Administrative Information

18. The fee for the plan(s) is based on:

- ☐ For a Water Pollution Abatement Plan or Modification, the total acreage of the site where regulated activities will occur.
- ☐ For an Organized Sewage Collection System Plan or Modification, the total linear footage of all collection system lines.
- ☒ For a UST Facility Plan or Modification or an AST Facility Plan or Modification, the total number of tanks or piping systems.
- ☐ A request for an exception to any substantive portion of the regulations related to the protection of water quality.
- ☐ A request for an extension to a previously approved plan.

19. ☒ Application fees are due and payable at the time the application is filed. If the correct fee is not submitted, the TCEQ is not required to consider the application until the correct fee is submitted. Both the fee and the Edwards Aquifer Fee Form have been sent to the Commission's:

- ☒ TCEQ cashier
- ☐ Austin Regional Office (for projects in Hays, Travis, and Williamson Counties)
- ☐ San Antonio Regional Office (for projects in Bexar, Comal, Kinney, Medina, and Uvalde Counties)

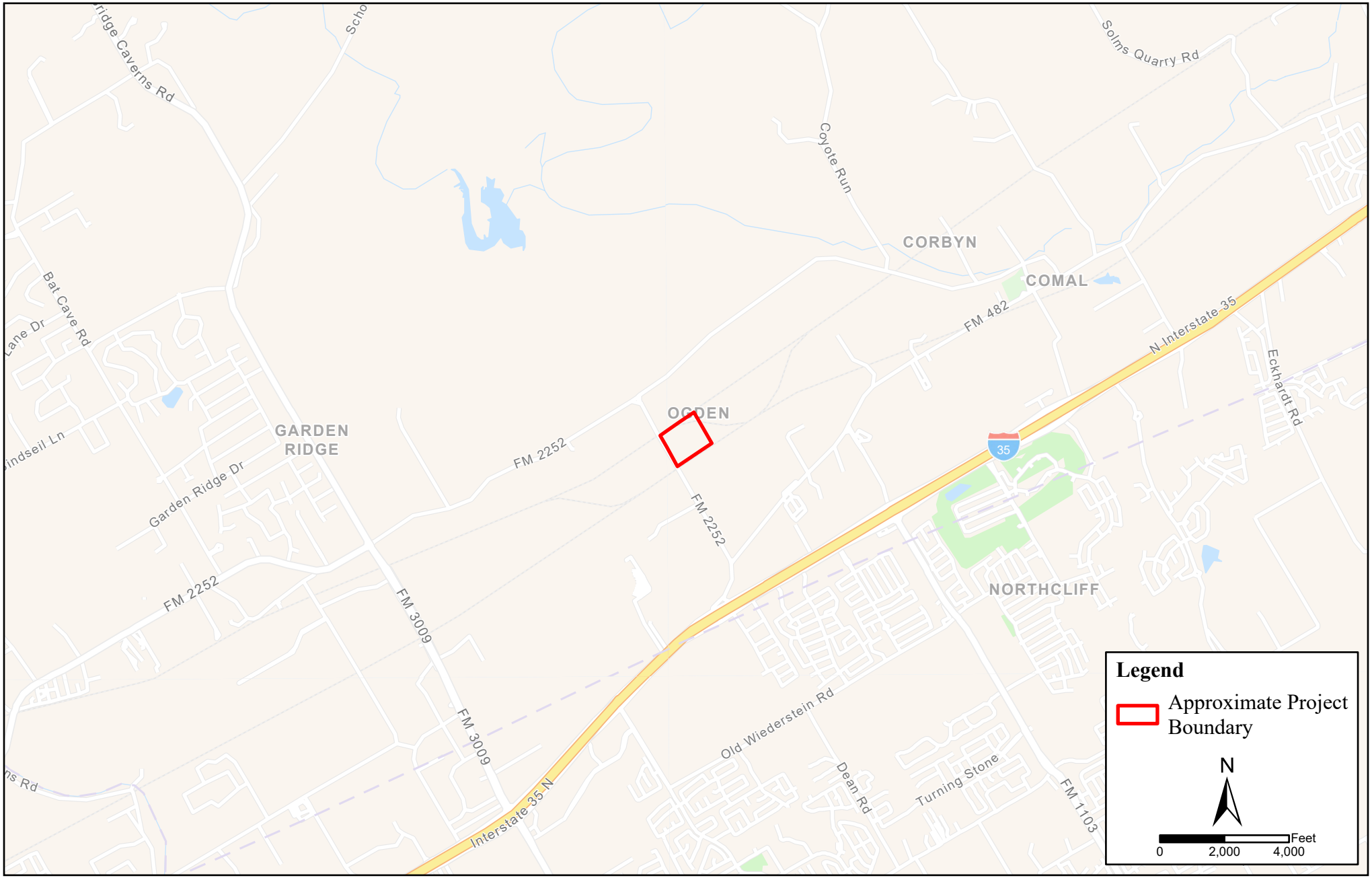
20. ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

21. ☒ No person shall commence any regulated activity until the Edwards Aquifer Protection Plan(s) for the activity has been filed with and approved by the Executive Director.

General Information Form

Attachment A

Road Map



SHEET NO.: 001
OF 001

IMAGE:	ESRI WORLD NAVIGATION MAP
ISSUE DATE:	01/30/2025
DRAWN BY:	JG
CHECKED BY:	JJS
SCALE: 1" =	4,000'
JOB NO.:	11607-002

ROAD MAP

OGDEN FACILITY
GENERAL SHALE
SCHERTZ, COMAL COUNTY, TEXAS

REV.	DESCRIPTION	BY	DATE

STATE OF TEXAS
JESSICA GARATE
GEOLOGY
15565
LICENSED
PROFESSIONAL GEOSCIENTIST

2/3/2025

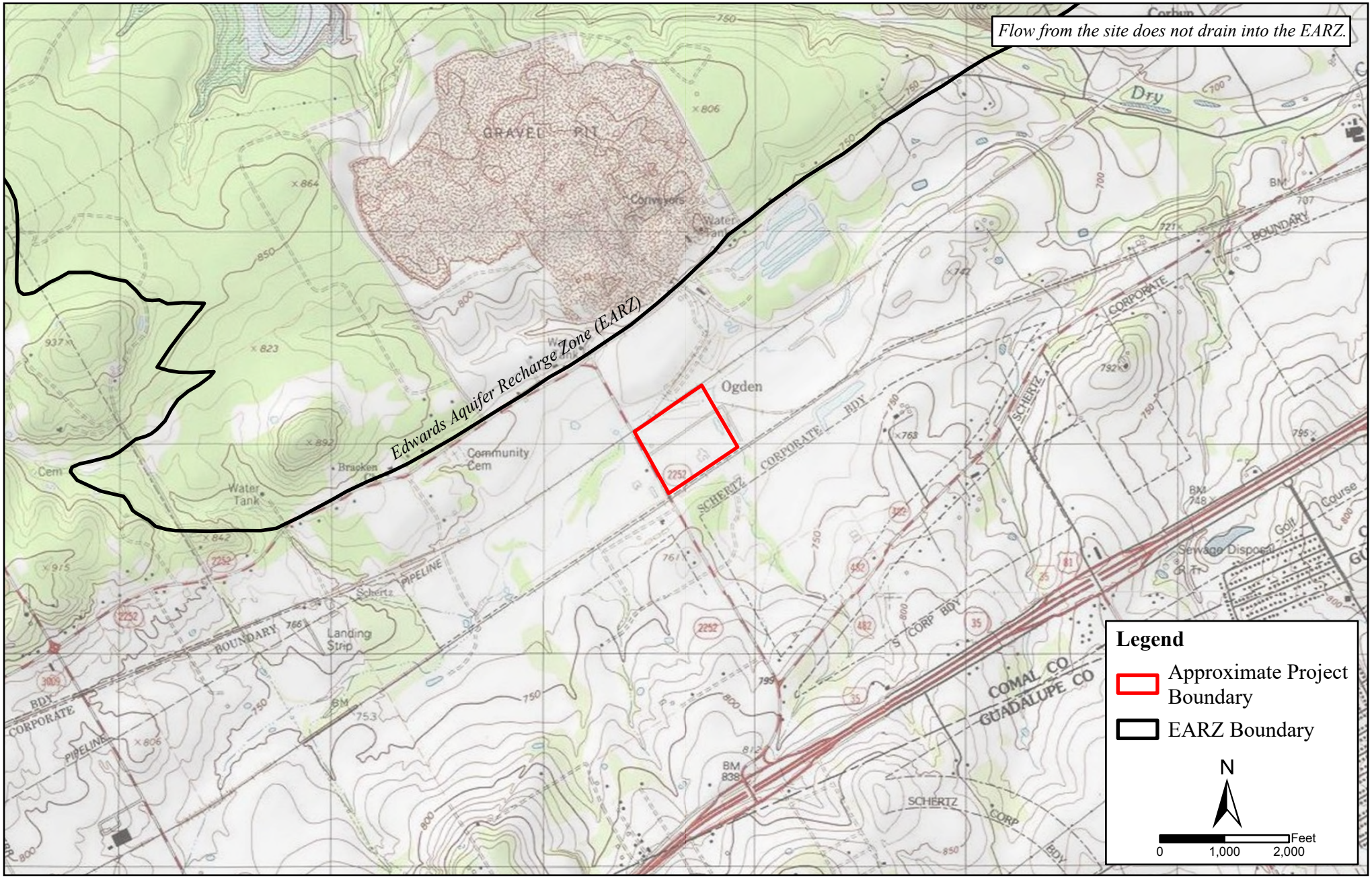
Jessica Garate

WESTWARD
Environmental. Engineering. Natural Resources.
P.O. Box 2205, Boerne, Texas 78006
(830) 249-8284 Fax: (830) 249-0221
TBPE REG. NO.: F-4524
TBPG REG. NO.: 50112

General Information Form

Attachment B

USGS/Edwards Recharge Zone Map



SHEET NO.:
001
OF 001

IMAGE:	USGS 7.5 TOPO QUAD BAT CAVE, TX
ISSUE DATE:	01/30/2025
DRAWN BY:	JG
CHECKED BY:	JJS
SCALE: 1" =	2,000'
JOB NO.:	11607-002

USGS MAP

OGDEN FACILITY
GENERAL SHALE
SCHERTZ, COMAL COUNTY, TEXAS

REV.	DESCRIPTION	BY	DATE

STATE OF TEXAS
JESSICA GARATE
GEOLOGY
15565
LICENSED
PROFESSIONAL GEOSCIENTIST

2/3/2025

Jessica Garate

WESTWARD
Environmental. Engineering. Natural Resources.
P.O. Box 2205, Boerne, Texas 78006
(830) 249-8284 Fax: (830) 249-0221
TBPE REG. NO.: F-4524
TBPG REG. NO.: 50112

General Information Form

Attachment C

Project Description

Attachment C – Project Description

A TCEQ investigation conducted on June 13, 2024 of the Red River Brick – Ogden Facility revealed that an above ground storage tank with a capacity of greater than 500 gallons had been installed without prior approval of an AST Plan modification. The AST in question is a double walled flame shield tank with a maximum capacity of 12,000 gallons. Currently this tank contains off-road diesel fuel. There is also a fueling area associated with the AST consisting of a fuel dispensing pump, piping, and a spill containment sump. The purpose of this modification is to add the 12,000 gallon AST to the existing Edwards Aquifer Protection Plan 13-93020301. A geological assessment of the site has been performed and is included in this modification along with drawings of the AST.

Area of Site: 32.15 Acres

Offsite Areas: Shipping Container Yard to the Southwest
Tiger Landscaping Supply to the Southeast
UFP Schertz, LLC to the South
Tricon Precast Ltd to the North
Heidelberg Materials to the Northwest
Railroad Right of Way along the northern and southern property boundaries
Route FM2252 Right of Way along the western property boundary
Heidelberg Materials along the eastern property boundary

Impervious Cover: 13.3 Acres – Concrete/Asphalt
2.2 Acres – Structures

Permanent BMPs: 2 Sediment Basins
1 Concrete Collection Channel

Proposed Site Use: Continued Concrete Block Manufacturing Plant

Site History: Concrete Block Manufacturing Plant

Previous Development: 13.3 Acres – Concrete/Asphalt
2.2 Acres – Structures
2 - Sediment Basins
1 - Concrete Collection Channel
1 - 12,000 gallon Diesel AST
Small Container Storage Areas

Areas to be Demolished: None

TCEQ Use Only

TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (*If other is checked please describe in space provided.*)

☐ New Permit, Registration or Authorization (*Core Data Form should be submitted with the program application.*)

☐ Renewal *(Core Data Form should be submitted with the renewal form)* ☒ Other

2. Customer Reference Number *(if issued)*	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number *(if issued)*
CN 606231090		RN 100851377

SECTION II: Customer Information

4. General Customer Information | **5. Effective Date for Customer Information Updates** (mm/dd/yyyy) 5/1/2023

☐ New Customer ☐ Update to Customer Information ☒ Change in Regulated Entity Ownership
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)

The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).

6. Customer Legal Name *(If an individual, print last name first: eg: Doe, John)* — *If new Customer, enter previous Customer below:*

Geneal Shale Brick Inc

7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number *(if applicable)*
804796274	12004545690	200454569	

11. Type of Customer: ☒ Corporation ☐ Individual Partnership: ☐ General ☐ Limited
Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other ☐ Sole Proprietorship ☐ Other:

12. Number of Employees
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☐ 501 and higher

13. Independently Owned and Operated?
☒ **Yes** ☐ **No**

14. Customer Role (Proposed or Actual) – *as it relates to the Regulated Entity listed on this form. Please check one of the following*

☐ Owner ☒ Operator ☐ Owner & Operator
☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant ☐ Other:

15. Mailing Address: 3015 Bristol Hwy

City	Johnson City	State	TN	ZIP	37601	ZIP + 4	

16. Country Mailing Information *(if outside USA)*	17. E-Mail Address *(if applicable)*

18. Telephone Number	19. Extension or Code	20. Fax Number *(if applicable)*

(432) 282-4661		( ) -

SECTION III: Regulated Entity Information

21. General Regulated Entity Information *(If 'New Regulated Entity" is selected, a new permit application is also required.)*

☐ New Regulated Entity ☒ Update to Regulated Entity Name ☐ Update to Regulated Entity Information

The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).

22. Regulated Entity Name *(Enter name of the site where the regulated action is taking place.)*

Ogden Facilty

23. Street Address of the Regulated Entity: ***(No PO Boxes)***	21455 FM 2252							
	City	Schertz	**State**	TX	**ZIP**	78154	**ZIP + 4**	9406
24. County	Comal							

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:					
26. Nearest City			**State**		**Nearest ZIP Code**

Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).

27. Latitude (N) In Decimal:	29.631756		**28. Longitude (W) In Decimal:**	-98.210158	
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds

29. Primary SIC Code (4 digits)	**30. Secondary SIC Code** (4 digits)	**31. Primary NAICS Code** (5 or 6 digits)	**32. Secondary NAICS Code** (5 or 6 digits)
3271	3251	327331	

33. What is the Primary Business of this entity? *(Do not repeat the SIC or NAICS description.)*

Concrete Block and Brick Manufacturing

34. Mailing Address:	**21455 FM 2252**							
	City	**Schertz**	**State**	**TX**	**ZIP**	**78154**	**ZIP + 4**	**9406**
35. E-Mail Address:								

36. Telephone Number	**37. Extension or Code**	**38. Fax Number** *(if applicable)*
( ) -		( ) -

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☐ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☒ Title V Air	☐ Tires	☐ Used Oil
		O1142, O1814, O1692, O1766, O1133		
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

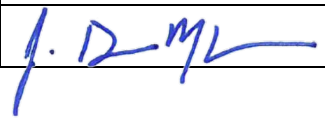
SECTION IV: Preparer Information

40. Name:	Nelwyn Mohrmann	**41. Title:**	Project Manager

42. Telephone Number	**43. Ext./Code**	**44. Fax Number**	**45. E-Mail Address**
(888 **)** 900-0746	725	**( )** -	nelwyn.mohrmann@tricordconsulting.com

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	General Shale Brick, Inc	**Job Title:**	Director, Environmental Compliance
Name *(In Print):*	David McKeown	**Phone:**	**(** 803 **)** 691- **3121**
Signature:		**Date:**	See STEERS

Modification of a Previously Approved Plan

Texas Commission on Environmental Quality

for Regulated Activities on the Edwards Aquifer Recharge Zone and Transition Zone and Relating to 30 TAC 213.4(j), Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

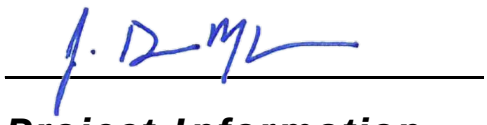
Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This request for a **Modification of a Previously Approved Plan** is hereby submitted for TCEQ review and executive director approval. The request was prepared by:

Print Name of Customer/Agent: J. David McKeown

Date: 03/04/2025

Signature of Customer/Agent:



Project Information

1. Current Regulated Entity Name: General Shale Brick, Inc. dba - Ogden Facility
   Original Regulated Entity Name: Meridian Brick LLC
   Regulated Entity Number(s) (RN): 100851377
   Edwards Aquifer Protection Program ID Number(s): 13-93020301
   ☐ The applicant has not changed and the Customer Number (CN) is: _____
   ☒ The applicant or Regulated Entity has changed. A new Core Data Form has been provided.

2. ☐ **Attachment A: Original Approval Letter and Approved Modification Letters**. A copy of the original approval letter and copies of any modification approval letters are attached.

3. A modification of a previously approved plan is requested for (check all that apply):
   - ☐ Physical or operational modification of any water pollution abatement structure(s) including but not limited to ponds, dams, berms, sewage treatment plants, and diversionary structures;
   - ☐ Change in the nature or character of the regulated activity from that which was originally approved or a change which would significantly impact the ability of the plan to prevent pollution of the Edwards Aquifer;
   - ☐ Development of land previously identified as undeveloped in the original water pollution abatement plan;
   - ☐ Physical modification of the approved organized sewage collection system;
   - ☐ Physical modification of the approved underground storage tank system;
   - ☒ Physical modification of the approved aboveground storage tank system.

4. ☒ Summary of Proposed Modifications (select plan type being modified). If the approved plan has been modified more than once, copy the appropriate table below, as necessary, and complete the information for each additional modification.

WPAP Modification Summary	***Approved Project***	***Proposed Modification***
Acres	_____	_____
Type of Development	_____	_____
Number of Residential Lots	_____	_____
Impervious Cover (acres)	_____	_____
Impervious Cover (%	_____	_____
Permanent BMPs	_____	_____
Other	_____	_____

SCS Modification Summary	***Approved Project***	***Proposed Modification***
Linear Feet	_____	_____
Pipe Diameter	_____	_____
Other	_____	_____

AST Modification Summary	*Approved Project*	*Proposed Modification*
Number of ASTs	____	X
Volume of ASTs	____	X
Other	____	____

UST Modification Summary	*Approved Project*	*Proposed Modification*
Number of USTs	____	____
Volume of USTs	____	____
Other	____	____

5. ☒ **Attachment B: Narrative of Proposed Modification**. A detailed narrative description of the nature of the proposed modification is attached. It discusses what was approved, including any previous modifications, and how this proposed modification will change the approved plan.

6. ☒ **Attachment C: Current Site Plan of the Approved Project**. A current site plan showing the existing site development (i.e., current site layout) at the time this application for modification is attached. A site plan detailing the changes proposed in the submitted modification is required elsewhere.
   - ☐ The approved construction has not commenced. The original approval letter and any subsequent modification approval letters are included as Attachment A to document that the approval has not expired.
   - ☐ The approved construction has commenced and has been completed. Attachment C illustrates that the site was constructed as approved.
   - ☒ The approved construction has commenced and has been completed. Attachment C illustrates that the site was **not** constructed as approved.
   - ☐ The approved construction has commenced and has **not** been completed. Attachment C illustrates that, thus far, the site was constructed as approved.
   - ☐ The approved construction has commenced and has **not** been completed. Attachment C illustrates that, thus far, the site was **not** constructed as approved.

7. ☐ The acreage of the approved plan has increased. A Geologic Assessment has been provided for the new acreage.
   ☒ Acreage has not been added to or removed from the approved plan.

8. ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

Aboveground Storage Tank Facility Plan Application

Texas Commission on Environmental Quality

For Permanent Storage on The Edwards Aquifer Recharge and Transition Zones And Relating to 30 TAC §213.5(e), Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

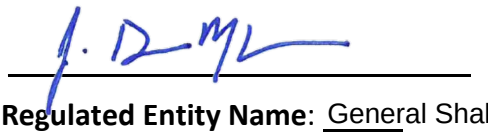
Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **Aboveground Storage Tank Facility Plan Application** is hereby submitted for TCEQ review and Executive Director approval. The application was prepared by:

Print Name of Customer/Agent: J. David McKeown

Date: 03/04/2025

Signature of Customer/Agent:



Regulated Entity Name: General Shale Brick, Inc. dba Red River Brick - Ogden Facility

Aboveground Storage Tank (AST) Facility Information

1. Tanks and substance stored:

Table 1 - Tank and Substance Storage

AST Number	*Size (Gallons)*	*Substance to be Stored*	*Tank Material*
1	12,000	Diesel Fuel	Steel
2			
3			
4			

AST Number	*Size (Gallons)*	*Substance to be Stored*	*Tank Material*
5			

Total x 1.5 = _____ Gallons

Double-Wall Tank

2. ☐ The AST will be placed within a containment structure that is sized to capture one and one-half (1 1/2) times the storage capacity of the system. For facilities with more than one tank system, the containment structure is sized to capture one and one-half (1 1/2) times the cumulative storage capacity of all systems.

   ☒ **Attachment A - Alternative Methods of Secondary Containment**. Alternative methods for providing secondary containment are proposed. Specifications that show equivalent protection for the Edwards Aquifer are attached. Double-wall Flame Shield tank as depicted in tank elevation drawings

3. Inside dimensions and capacity of containment structure(s):

Table 2 - Secondary Containment 12,000 Double-Wall Tank

Length (L) (Ft.)	*Width (W) (Ft.)*	*Height (H) (Ft.)*	*L x W x H = (Ft3)*	*Gallons*
32'	8'	8'		

Total: _____ Gallons

4. ☐ All piping, hoses, and dispensers will be located inside the containment structure.

   ☒ Some of the piping to dispensers or equipment will extend outside the containment structure.

   ☐ The piping will be aboveground

   ☒ The piping will be underground

5. ☒ The containment area must be constructed of and in a material impervious to the substance(s) being stored. The proposed containment structure will be constructed of _____. Steel double walled tank
   Concrete sump at fueling area

6. ☒ **Attachment B - Scaled Drawing(s) of Containment Structure**. A scaled drawing of the containment structure that shows the following is attached:

   ☒ Interior dimensions (length, width, depth and wall and floor thickness).

   ☒ Internal drainage to a point convenient for the collection of any spillage.

   ☒ Tanks clearly labeled.

   ☒ Piping clearly labeled.

   ☒ Dispenser clearly labeled.

Site Plan Requirements

Items 7 - 18 must be included on the Site Plan.

7. ☒ The Site Plan must have a minimum scale of 1" = 400'.

   Site Plan Scale: 1" = 300 '.

8. 100-year floodplain boundaries: Depicted on Geological Assessment Maps

   ☒ Some part(s) of the project site is located within the 100-year floodplain. The floodplain is shown and labeled.

   ☐ No part of the project site is located within the 100-year floodplain.

   ☒ The 100-year floodplain boundaries are based on the following specific (including date of material) sources(s): FEMA.National Flood Hazard Layer. Map dated February 3, 2025

9. ☐ The layout of the development is shown with existing and finished contours at appropriate, but not greater than ten-foot contour intervals. Show lots, recreation centers, buildings, roads, etc.

   ☒ The layout of the development is shown with existing contours. Finished topographic contours will not differ from the existing topographic configuration and are not shown.

10. All known wells (oil, water, unplugged, capped and/or abandoned, test holes, etc.):

    ☐ There are _____ (#) wells present on the project site and the locations are shown and labeled. (Check all of the following that apply):

    ☐ The wells are not in use and have been properly abandoned.

    ☐ The wells are not in use and will be properly abandoned.

    ☐ The wells are in use and comply with 16 TAC § 76.

    ☒ There are no wells or test holes of any kind known to exist on the project site.

11. Geologic or manmade features which are on the site:

    ☐ All sensitive geologic or manmade features identified in the Geologic Assessment are shown and labeled.

    ☒ No sensitive geologic or manmade features were identified in the Geologic Assessment.

    ☐ **Attachment C - Exception to the Geologic Assessment**. A request and justification for an exception to a portion of the Geologic Assessment is attached.

12. ☒ The drainage patterns and approximate slopes anticipated after major grading activities.

13. ☒ Areas of soil disturbance and areas which will not be disturbed.

14. ☒ Locations of major structural and nonstructural controls. These are the temporary and permanent best management practices.

15. ☒ Locations where soil stabilization practices are expected to occur.

16. ☒ Surface waters (including wetlands).

    ☐ N/A

17. ☒ Locations where stormwater discharges to surface water or sensitive features.

    ☐ There will be no discharges to surface water or sensitive features.

18. ☒ Legal boundaries of the site are shown.

Best Management Practices

19. ☒ Any spills must be directed to a point convenient for collection and recovery. Spills from storage tank facilities must be removed from the controlled drainage area for disposal within 24 hours of the spill.

    ☒ In the event of a spill, any spillage will be removed from the containment structure within 24 hours of the spill and disposed of properly.

    ☐ In the event of a spill, any spillage will be drained from the containment structure through a drain and valve within 24 hours of the spill and disposed of properly. The drain and valve system are shown in detail on the scaled drawing.

20. ☒ All stormwater accumulating inside the containment structure will be disposed of through an authorized waste disposal contractor.

    ☒ Containment area will be covered by a roof.

    ☐ Containment area will not be covered by a roof.

    ☐ A description of the alternate method of stormwater disposal is submitted for the executive director's review and approval and is attached.

21. ☒ **Attachment D - Spill and Overfill Control**. A site-specific description of the methods to be used at the facility for spill and overfill control is attached. See attached SPCC Plan

22. ☒ **Attachment E - Response Actions to Spills**. A site-specific description of the planned response actions to spills that will take place at the facility is attached. See attached SPCC Plan

Administrative Information

23. A Water Pollution Abatement Plan (WPAP) is required for construction of any associated commercial, industrial or residential project located on the Recharge Zone.

    ☐ The WPAP application for this project was approved by letter dated _____. A copy of the approval letter is attached at the end of this application.

    ☐ The WPAP application for this project was submitted to the TCEQ on _____, but has not been approved.

    ☐ A WPAP application is required for an associated project, but it has not been submitted.

☐ There will be no building or structure associated with this project. In the event a building or structure is needed in the future, the required WPAP will be submitted to the TCEQ.

☒ The proposed AST is located on the Transition Zone and a WPAP is not required. Information requested in 30 TAC 213.5 subsection (b) (4)(B) and (C) and (5) is provided with this application. (Forms TCEQ-0600 Permanent Stormwater Section and TCEQ-0602 Temporary Stormwater Section or Stormwater Pollution Prevention Plan/SW3P).

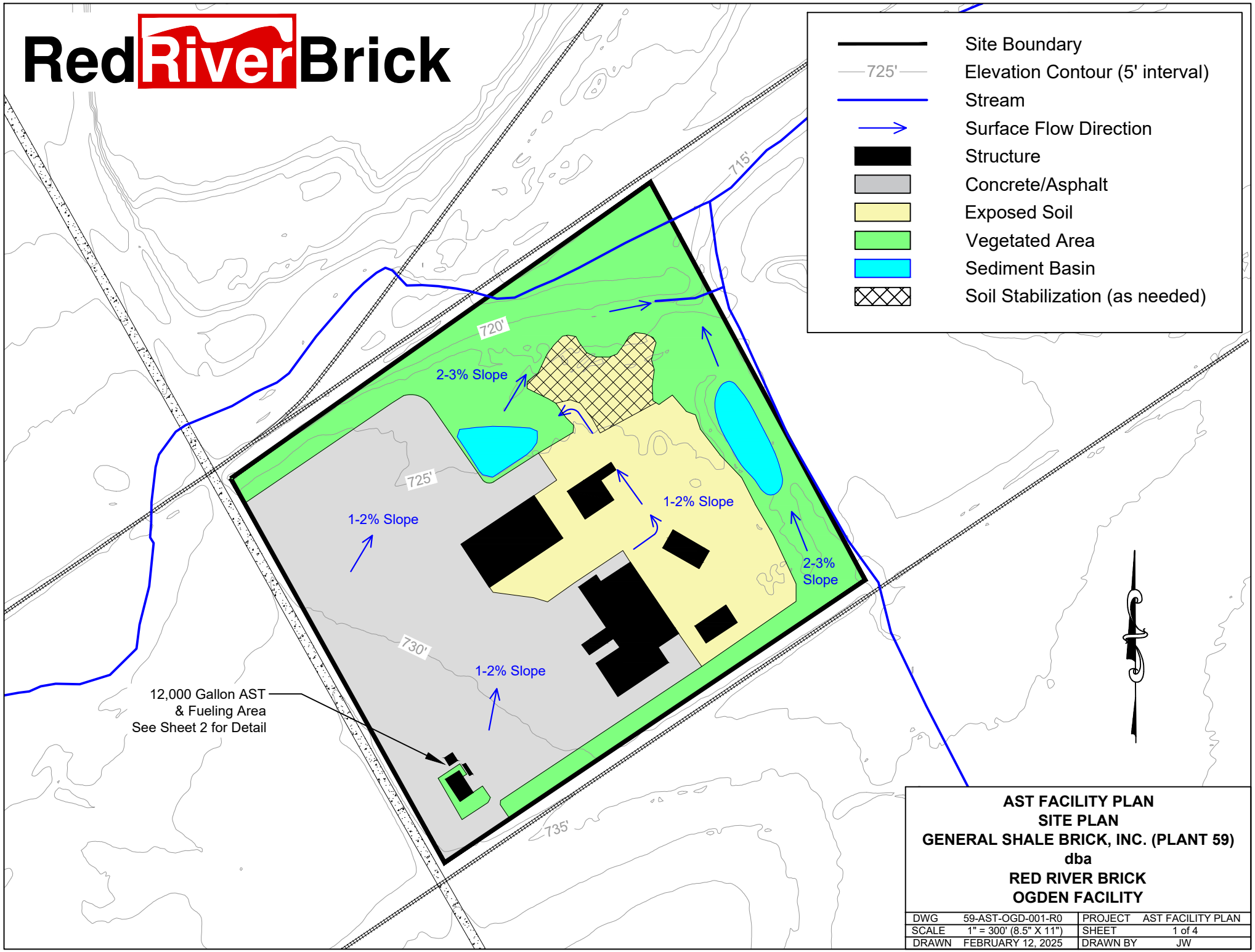
24. ☐ This facility is subject to the requirements for the reporting and cleanup of surface spills and overfills pursuant to 30 TAC 334 Subchapter D relating to Release Reporting and Corrective Action.

25. ☐ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

26. ☐ Any modification of this AST Facility Plan application will require executive director approval, prior to construction, and may require submission of a revised application, with appropriate fees.

AST Facility Plan Modification Narrative

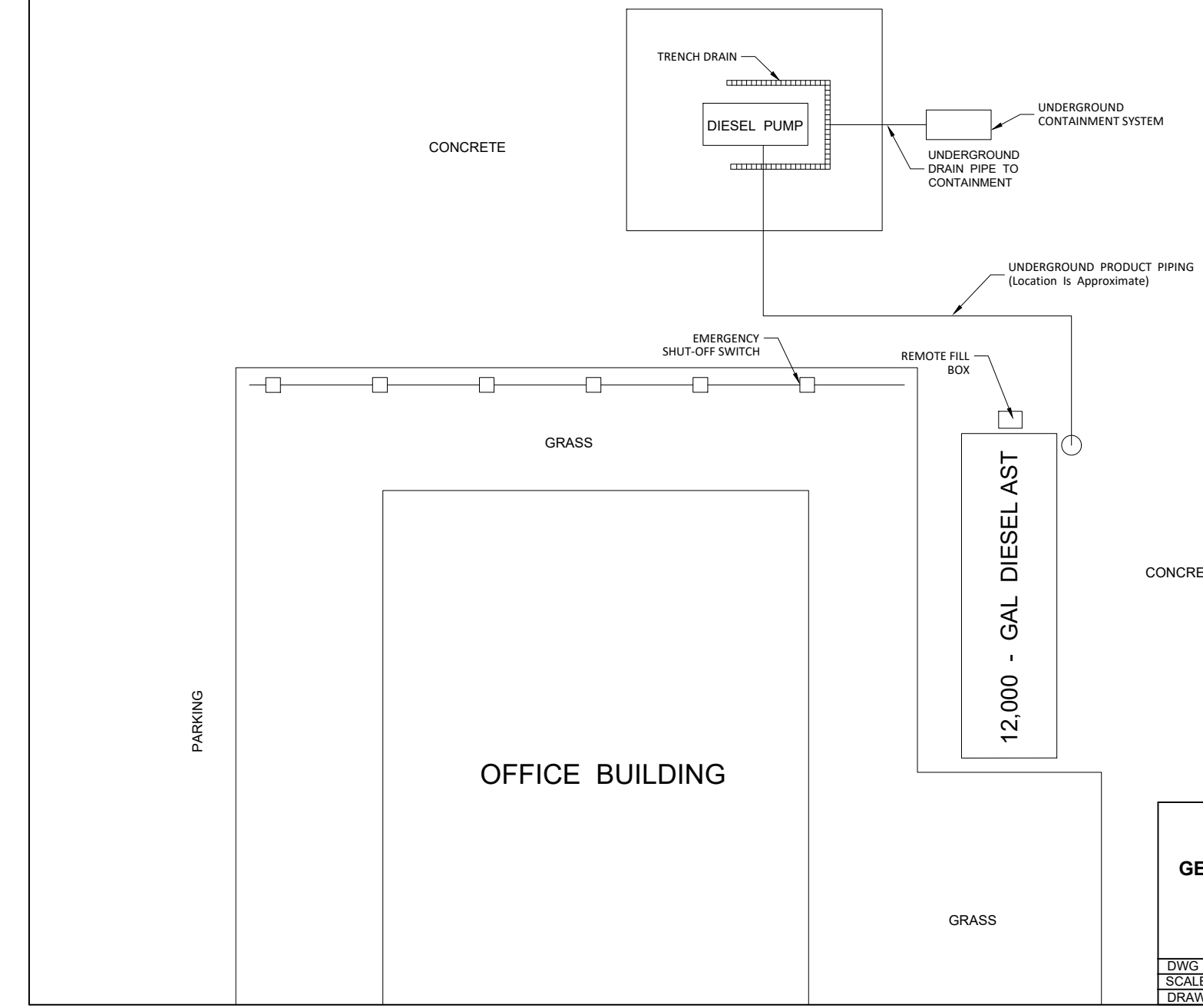
A TCEQ investigation conducted on June 13, 2024 of the Red River Brick – Ogden Facility revealed that an above ground storage tank with a capacity of greater than 500 gallons had been installed without prior approval of an AST Plan modification. The AST in question is a double walled flame shield tank with a maximum capacity of 12,000 gallons. Currently this tank contains off-road diesel fuel. There is also a fueling area associated with the AST consisting of a fuel dispensing pump, piping, and a spill containment sump. The purpose of this modification is to add the 12,000 gallon AST to the existing Edwards Aquifer Protection Plan 13-93020301. A geological assessment of the site has been performed and is included in this modification along with drawings of the AST.

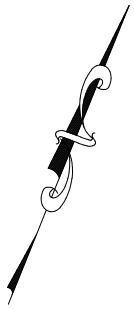


AST FACILITY PLAN
SITE PLAN
GENERAL SHALE BRICK, INC. (PLANT 59)
dba
RED RIVER BRICK
OGDEN FACILITY

DWG	59-AST-OGD-001-R0	PROJECT	AST FACILITY PLAN
SCALE	1" = 300' (8.5" X 11")	SHEET	1 of 4
DRAWN	FEBRUARY 12, 2025	DRAWN BY	JW

RedRiverBrick

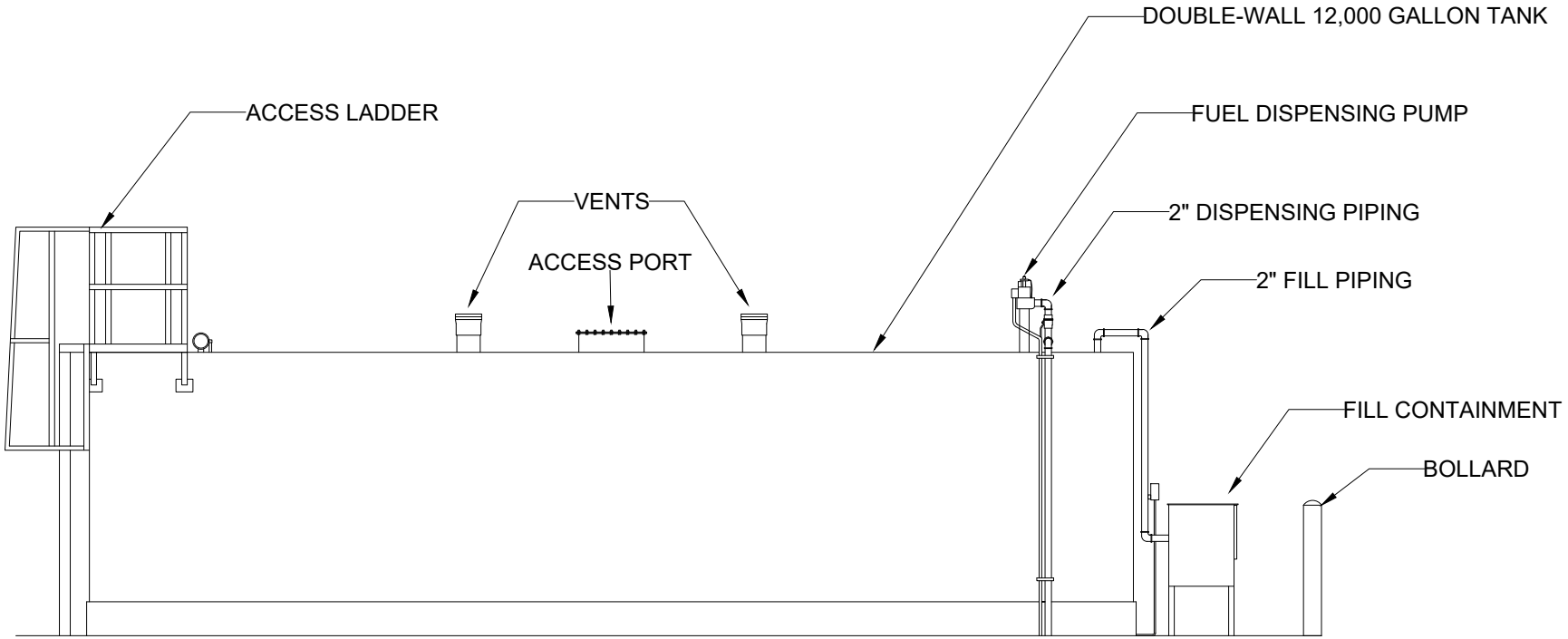




AST FACILITY PLAN
FUELING AREA - PLAN VIEW
GENERAL SHALE BRICK, INC. (PLANT 59)
dba
RED RIVER BRICK
OGDEN FACILITY

DWG	59-AST-OGD-002-R0	PROJECT	AST FACILITY PLAN
SCALE	1" = 15' (8.5" X 11")	SHEET	2 of 4
DRAWN	FEBRUARY 12, 2025	DRAWN BY	JW

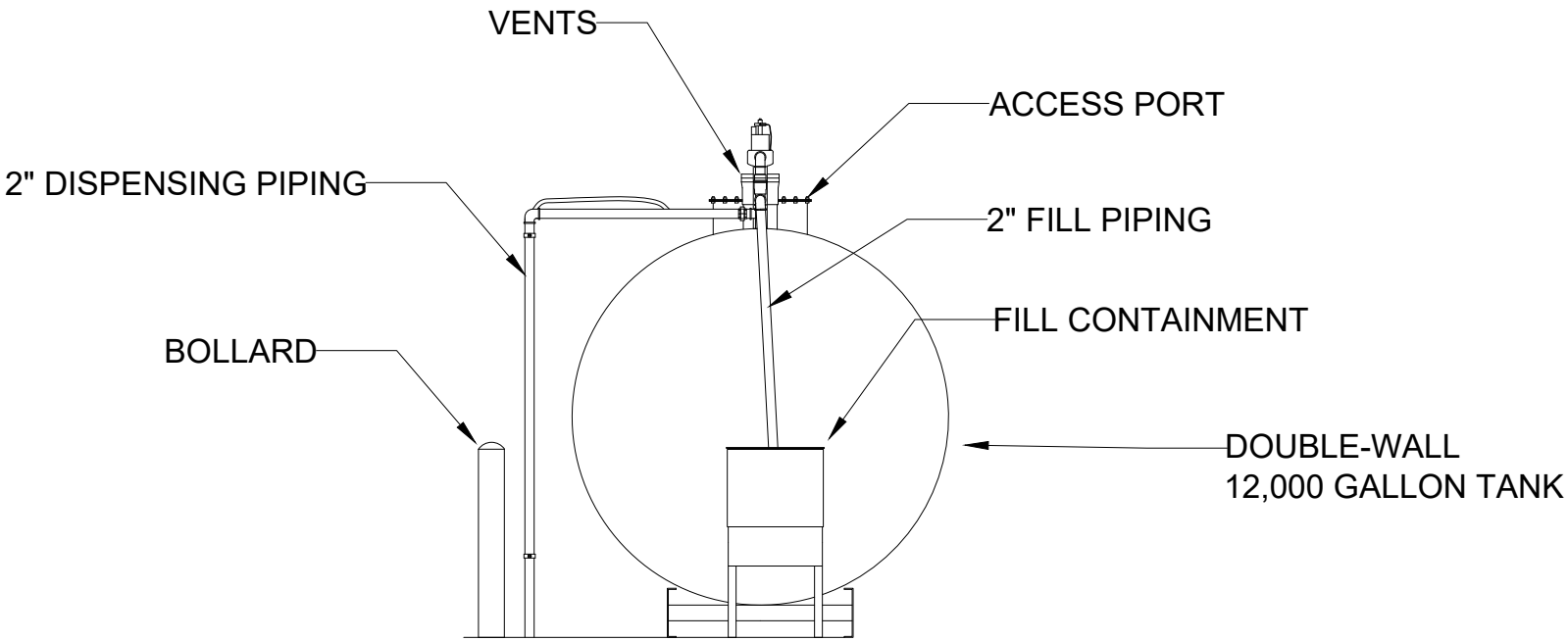
RedRiverBrick



AST FACILITY PLAN
12,000 GAL TANK - SIDE ELEVATION
GENERAL SHALE BRICK, INC. (PLANT 59)
dba
RED RIVER BRICK
OGDEN FACILITY

DWG	59-AST-OGD-003-P1	PROJECT	AST FACILITY PLAN
SCALE	3/16" = 1' (8.5" X 11")	SHEET	3 of 4
DRAWN	FEBRUARY 12, 2025	DRAWN BY	JW

RedRiverBrick



AST FACILITY PLAN
12,000 GAL TANK - FRONT ELEVATION
GENERAL SHALE BRICK, INC. (PLANT 59)
dba
RED RIVER BRICK
OGDEN FACILITY

DWG	59-AST-OGD-004-P1	PROJECT	AST FACILITY PLAN
SCALE	1/4" = 1' (8.5" X 11")	SHEET	4 of 4
DRAWN	FEBRUARY 12, 2025	DRAWN BY	JW

Temporary Stormwater Section

Texas Commission on Environmental Quality

for Regulated Activities on the Edwards Aquifer Recharge Zone and Relating to 30 TAC §213.5(b)(4)(A), (B), (D)(I) and (G); Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **Temporary Stormwater Section** is hereby submitted for TCEQ review and executive director approval. The application was prepared by:

Print Name of Customer/Agent: J. David McKeown

Date: March 25, 2025

Signature of Customer/Agent:

J. D McL

Regulated Entity Name: General Shale Brick, Inc. dba Red River Brick - Ogden Facility

Project Information

Potential Sources of Contamination

Examples: Fuel storage and use, chemical storage and use, use of asphaltic products, construction vehicles tracking onto public roads, and existing solid waste.

1. Fuels for construction equipment and hazardous substances which will be used during construction:

   ☒ The following fuels and/or hazardous substances will be stored on the site: Diesel Fuel

   These fuels and/or hazardous substances will be stored in:

   ☐ Aboveground storage tanks with a cumulative storage capacity of less than 250 gallons will be stored on the site for less than one (1) year.

☐ Aboveground storage tanks with a cumulative storage capacity between 250 gallons and 499 gallons will be stored on the site for less than one (1) year.

☒ Aboveground storage tanks with a cumulative storage capacity of 500 gallons or more will be stored on the site. An Aboveground Storage Tank Facility Plan application must be submitted to the appropriate regional office of the TCEQ prior to moving the tanks onto the project.

☐ Fuels and hazardous substances will not be stored on the site.

2. ☒ **Attachment A - Spill Response Actions**. A site specific description of the measures to be taken to contain any spill of hydrocarbons or hazardous substances is attached.

3. ☒ Temporary aboveground storage tank systems of 250 gallons or more cumulative storage capacity must be located a minimum horizontal distance of 150 feet from any domestic, industrial, irrigation, or public water supply well, or other sensitive feature.

4. ☒ **Attachment B - Potential Sources of Contamination**. A description of any activities or processes which may be a potential source of contamination affecting surface water quality is attached.

Sequence of Construction

5. ☒ **Attachment C - Sequence of Major Activities**. A description of the sequence of major activities which will disturb soils for major portions of the site (grubbing, excavation, grading, utilities, and infrastructure installation) is attached.

   ☐ For each activity described, an estimate (in acres) of the total area of the site to be disturbed by each activity is given.

   ☐ For each activity described, include a description of appropriate temporary control measures and the general timing (or sequence) during the construction process that the measures will be implemented.

6. ☒ Name the receiving water(s) at or near the site which will be disturbed or which will receive discharges from disturbed areas of the project: Segment 1811A UT to Dry Comal Creek to Comal River

Temporary Best Management Practices (TBMPs)

Erosion control examples: tree protection, interceptor swales, level spreaders, outlet stabilization, blankets or matting, mulch, and sod. Sediment control examples: stabilized construction exit, silt fence, filter dikes, rock berms, buffer strips, sediment traps, and sediment basins. Please refer to the Technical Guidance Manual for guidelines and specifications. All structural BMPs must be shown on the site plan.

7. ☒ **Attachment D – Temporary Best Management Practices and Measures**. TBMPs and measures will prevent pollution of surface water, groundwater, and stormwater. The construction-phase BMPs for erosion and sediment controls have been designed to retain sediment on site to the extent practicable. The following information is attached:

☒ A description of how BMPs and measures will prevent pollution of surface water, groundwater or stormwater that originates upgradient from the site and flows across the site.

☒ A description of how BMPs and measures will prevent pollution of surface water or groundwater that originates on-site or flows off site, including pollution caused by contaminated stormwater runoff from the site.

☒ A description of how BMPs and measures will prevent pollutants from entering surface streams, sensitive features, or the aquifer.

☒ A description of how, to the maximum extent practicable, BMPs and measures will maintain flow to naturally-occurring sensitive features identified in either the geologic assessment, TCEQ inspections, or during excavation, blasting, or construction.

8. ☒ The temporary sealing of a naturally-occurring sensitive feature which accepts recharge to the Edwards Aquifer as a temporary pollution abatement measure during active construction should be avoided.

☐ **Attachment E - Request to Temporarily Seal a Feature**. A request to temporarily seal a feature is attached. The request includes justification as to why no reasonable and practicable alternative exists for each feature.

☒ There will be no temporary sealing of naturally-occurring sensitive features on the site.

9. ☒ **Attachment F - Structural Practices**. A description of the structural practices that will be used to divert flows away from exposed soils, to store flows, or to otherwise limit runoff discharge of pollutants from exposed areas of the site is attached. Placement of structural practices in floodplains has been avoided.

10. ☒ **Attachment G - Drainage Area Map**. A drainage area map supporting the following requirements is attached:

☒ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a sediment basin will be provided.

☐ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a smaller sediment basin and/or sediment trap(s) will be used.

☐ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a sediment basin or other equivalent controls are not attainable, but other TBMPs and measures will be used in combination to protect down slope and side slope boundaries of the construction area.

☐ There are no areas greater than 10 acres within a common drainage area that will be disturbed at one time. A smaller sediment basin and/or sediment trap(s) will be used in combination with other erosion and sediment controls within each disturbed drainage area.

☐ There are no areas greater than 10 acres within a common drainage area that will be disturbed at one time. Erosion and sediment controls other than sediment basins or sediment traps within each disturbed drainage area will be used.

11. ☐ **Attachment H - Temporary Sediment Pond(s) Plans and Calculations**. Temporary sediment pond or basin construction plans and design calculations for a proposed temporary BMP or measure have been prepared by or under the direct supervision of a Texas Licensed Professional Engineer. All construction plans and design information must be signed, sealed, and dated by the Texas Licensed Professional Engineer. Construction plans for the proposed temporary BMPs and measures are attached.

☒ N/A All sediment basins are existing. No further construction is needed.

12. ☒ **Attachment I - Inspection and Maintenance for BMPs.** A plan for the inspection of each temporary BMP(s) and measure(s) and for their timely maintenance, repairs, and, if necessary, retrofit is attached. A description of the documentation procedures, recordkeeping practices, and inspection frequency are included in the plan and are specific to the site and/or BMP.

13. ☒ All control measures must be properly selected, installed, and maintained in accordance with the manufacturer's specifications and good engineering practices. If periodic inspections by the applicant or the executive director, or other information indicate a control has been used inappropriately, or incorrectly, the applicant must replace or modify the control for site situations.

14. ☒ If sediment escapes the construction site, off-site accumulations of sediment must be removed at a frequency sufficient to minimize offsite impacts to water quality (e.g., fugitive sediment in street being washed into surface streams or sensitive features by the next rain).

15. ☒ Sediment must be removed from sediment traps or sedimentation ponds not later than when design capacity has been reduced by 50%. A permanent stake will be provided that can indicate when the sediment occupies 50% of the basin volume.

16. ☒ Litter, construction debris, and construction chemicals exposed to stormwater shall be prevented from becoming a pollutant source for stormwater discharges (e.g., screening outfalls, picked up daily).

Soil Stabilization Practices

Examples: establishment of temporary vegetation, establishment of permanent vegetation, mulching, geotextiles, sod stabilization, vegetative buffer strips, protection of trees, or preservation of mature vegetation.

17. ☒ **Attachment J - Schedule of Interim and Permanent Soil Stabilization Practices**. A schedule of the interim and permanent soil stabilization practices for the site is attached.

18. ☒ Records must be kept at the site of the dates when major grading activities occur, the dates when construction activities temporarily or permanently cease on a portion of the site, and the dates when stabilization measures are initiated.

19. ☒ Stabilization practices must be initiated as soon as practicable where construction activities have temporarily or permanently ceased.

Administrative Information

20. ☒ All structural controls will be inspected and maintained according to the submitted and approved operation and maintenance plan for the project.

21. ☒ If any geologic or manmade features, such as caves, faults, sinkholes, etc., are discovered, all regulated activities near the feature will be immediately suspended. The appropriate TCEQ Regional Office shall be immediately notified. Regulated activities must cease and not continue until the TCEQ has reviewed and approved the methods proposed to protect the aquifer from any adverse impacts.

22. ☒ Silt fences, diversion berms, and other temporary erosion and sediment controls will be constructed and maintained as appropriate to prevent pollutants from entering sensitive features discovered during construction.

Temporary Stormwater Section

Attachment A

Spill Response Actions

3.0 SPILL RESPONSE

This portion of the SPCC Plan covers the facility's countermeasures to a potential spill and includes actions such as spill notification requirements, spill contents recovery, response, and cleanup.

All oil spills, regardless of size, must be contained and cleaned up in a safe and effective manner.

To determine the proper response procedures, this plan classifies spills as 'incidental,' 'non-incidental,' or 'imminent danger,' depending on the following characteristics:

Table 2. Oil Spill Response Criteria

Incidental Spills	Non-Incidental Spills	Imminent Danger Spills
• The spill is small, less than 1- gallon. • The spill can be easily contained. • The spill is unlikely to reach a navigable waterway, storm sewer, or sanitary drain. • Cleanup procedures do not pose a health or safety hazard. • Proper response equipment is available for a safe cleanup. • Responding personnel have completed annual SPCC training. • Responding personnel are comfortable with cleaning up the spill.	• The spill is large enough to spread beyond the immediate area (generally 1 to 20 gallons in size). • Spill may reach a navigable waterway, storm sewer, or sanitary drain. • Spill may require special equipment or training to clean up. • If facility personnel address the spill, responding personnel have completed annual SPCC training. • If responding personnel are not comfortable cleaning up the spill, use a third-party contractor.	• Based on the assessment of the fuel delivery driver or trained oil handling employee(s), the spill poses an immediate hazard to human health or the environment. • There is danger of fire or explosion. • Spill involves injury to personnel. • The spill has reached a navigable waterway, storm sewer, or sanitary drain. • The spill cannot be contained.
Response by facility personnel possible **Notify Facility Emergency Coordinator (FEC) or Alternate FEC following response**	**Response requires coordination with Facility Emergency Coordinator (FEC) or Alternate FEC**	**Requires response by the Bracken Volunteer Fire Department – Call 911**

Notify the appropriate authority based on the classification of the spill. If unable to identify the appropriate level of spill classification, notify the Facility Emergency Coordinator immediately. See the flowchart in **Appendix G** for specific spill response steps. Post the provided **Spill Response Flow Chart** in close proximity to key oil storage areas. Details regarding the spill volumes, direction of flow, and potential spill receptors for individual tanks and containers at the facility are listed in **Table 1** on **Page 4**.

A number of spill scenarios are possible. The severity of the spill is dependent on a number of factors, such as, the spill scenario, the spill flow rate, or secondary containment. The spill flow rate could potentially range from a gradual spill (i.e., drip) to an instantaneous spill (i.e., complete failure) for its oil sources. This plan will rely on the Oil Spill Response Criteria (above) and the Spill Response Flow Chart (**Appendix G**) to determine how to most appropriately respond to each spill.

3.1 VERBAL OIL SPILL NOTIFICATION REQUIREMENTS

Depending on the nature and quantity of the oil spilled, several individuals and organizations must be contacted by the Facility Emergency Coordinator or designee in the event of a spill. Circumstances, instructions, and phone numbers for reporting a spill to federal, state and local agencies, and to other affected parties are provided below. **If in doubt about whether to report a spill or not, report it**.

Table 3. Oil Spill Notification Procedures

Agency/ Organization	Contact	Circumstances	When to Notify
State Agencies			
Texas Commission on Environmental Quality/State Emergency Response Commission	State of Texas Spill – Reporting Hotline: 1-800-832-8224 (24-hours) Central Texas Regional Office – 210-403-4010 (Daytime only) 12100 Park 35 Circle Austin, TX 78753	All petroleum and used oil spills onto land equal to or greater than 25 gallons in any 24-hour period. All spills that produces a sheen on water and/or threatens navigable waters.	**As soon as possible** but not later than 24 hours after discovery of the spill or discharge. Written follow-up within 30 days after initial notification.
Federal Agencies			
USEPA National Response Center (NRC)	1-800-424-8802 www.nrc.uscg.mil	Discharge reaches navigable waters.	**As Soon As Possible**(verbal)
EPA Region 6 Regional Office	USEPA Region 6 1-800-887-6063 1201 Elm Street, Suite 500 Dallas, TX 75270	Discharge of 1,000 gallons or more; **or** Second discharge of 42 gallons or more over a 12-month period.	**Within 60 days:** Written notification (see **Section 3.3**)
Local Agencies			
Bracken Volunteer Fire Department	911	Spill that poses emergency conditions, regardless of the volume discharged.	**Immediately** (verbal)

Table 3. Oil Spill Notification Procedures

Agency/ Organization	Contact	Circumstances	When to Notify
Comal County Emergency Management and Emergency Operations	830-221-1108 (Daytime hours)	Spill that poses emergency conditions, regardless of the volume discharged.	**As Soon As Possible** (verbal)

For local agencies, a spill posing emergency conditions or imminent danger requires "immediate" notification to those authorities without other actions.

For state and federal agency verbal notifications, a spill that has occurred and meets reporting thresholds stated above requires notification "As Soon As Possible". In the case of state and federal verbal notifications, the facility can respond to spills that don't pose imminent danger and collect all the information needed to complete the Spill Incident Report (**Appendix E**) prior to making these verbal notifications to agencies, but they should be made as soon as reasonably possible.

Under the SPCC rule, a reportable spill refers to any amount of oil that **reaches, or threatens to reach, a** navigable waterway. A waterway is generally defined as a storm sewer, storm water detention basin, ditch, creek, lake, river, groundwater, etc.

3.2 USEPA WRITTEN SPILL NOTIFICATION REQUIREMENTS

A written notification to the USEPA Regional Administrator is required for any single discharge of oil to a navigable waterway or adjoining shoreline waterway, for any discharge greater than 1,000 gallons, or for two discharges of 42 gallons or more of oil to navigable waters in any 12-month period. This report must be made within 60 days of the discharge and must include the following information:

1. Name of the facility.
2. Name of the individual submitting the information.
3. Location of the facility.
4. Maximum storage or handling capacity of the facility and normal daily throughput.
5. The corrective actions and/or countermeasures taken, including adequate description of equipment repairs and/or replacements.
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps.
7. A complete copy of the SPCC Plan with any amendments.
8. The cause(s) of such discharge(s), including a failure analysis of the system or subsystem in which the failure(s) occurred.
9. Additional preventative measures taken or contemplated to minimize the possibility of recurrence.

3.3 SPILL RESPONSE MATERIALS AND WASTE DISPOSAL

Spill Response Materials / Equipment

Table 4. Spill Response Materials and Equipment

Location	Response Materials
Main Plant Building	Spill kit drum with absorbent materials
Southeast Metal Building	Spill kit drum with absorbent materials
Adjacent to ASTs	Spill Kit drum with absorbent materials

Disposal of Used Sorbents and Contaminated Soil

- Record used sorbents and contaminated soil reclaimed after a spill in the Oil Spill Disposal Record (**Appendix F**).
- Dispose used sorbents and contaminated soil in a manner consistent with local, state, and federal regulations, as well as Meridian Brick policy.
- Contain absorbent materials separately from contaminated soil/granular clay (Oil-Dri) in drums or non-leaking containers.
- Work with your regulated waste vendor to determine if the spilled product may be considered a hazardous waste.

Notes: Oil absorbents that are not hazardous waste may be placed in the trash if there is no free-flowing oil remaining in the absorbents. A licensed waste disposal company can help with removal and treatment of hazardous wastes and absorbents with free-flowing oil.

4.0 SPILL PREVENTION

This section covers the Facility's prevention and control measures in place to help this facility limit its potential for spills.

4.1 POTENTIAL OIL SPILL SOURCES

For the oil sources at this facility, the maximum spill volumes, direction of flow, and potential spill receptors for individual tanks and containers are listed in **Table 1** and shown on **Figure 3**. An oil spill could occur due to any of the following situations:

During loading/unloading activities, such as:

- Overflow or spillage during tank or container filling

Temporary Stormwater Section

Attachment B

Potential Sources of Contamination

3.3 SPILL RESPONSE MATERIALS AND WASTE DISPOSAL

Spill Response Materials / Equipment

Table 4. Spill Response Materials and Equipment

Location	Response Materials
Main Plant Building	Spill kit drum with absorbent materials
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During loading/unloading activities, such as:

- Overflow or spillage during tank or container filling

- Potential rate of flow is dependent on fill rate of mobile tanker truck (typically ranges between 60 gallons per minute [gpm] and 300 gpm)
- Total volume released is dependent on how quickly the filling technician or facility representative (if observing transfer process) is able to press the emergency shutoff button on the tanker truck and size/remaining product in the mobile tanker truck (typically ranges from zero to hundreds of gallons).
- Third party tank trucks that services the facility are typically 5,000 gallons.

- Spillage during tank or container emptying
  - Potential rate of flow is dependent on the empty rate of the truck or pump (typically ranges from 5 to 10 gpm for pumps and 60 to 300 gpm for mobile tanker trucks)
  - Total volume released dependent on how quickly the filling technician or facility representative (if observing transfer process) is able to turn off/unplug the pump or press the emergency shutoff button on the truck and size/remaining product in the mobile tank truck (typically ranges from zero to hundreds of gallons).

Due to equipment failure, such as:

- Tank rupture as a result of nature, human error, or vandalism
  - Potential release rate is instantaneous (entire container contents released immediately) and total volume released is equal to the volume of the container (see **Table 1**)
- Leaks due to corrosion or partial failure of tank or container seams, pipes, valves, or connections
  - Potential release rate is approximately 0 to 10 gpm and total volume released is equal to the volume of the container (see **Table 1**)
- Failure of oil-filled equipment

4.2 GENERAL SPILL PREVENTION MEASURES

Implement the following measures, if not already, to prevent or limit an oil spill at the facility:

- Verify that tanks and containers are constructed of material compatible with the oil being stored (**Section 4.8**).
- Provide a functioning liquid level sensing device for bulk storage containers, such as a visual gauge, an electronic high level alarm, or automatic pump cutoff (**Section 4.4.3**).
- Practice good housekeeping to ensure that oil storage areas are kept clear of debris.
- Promptly correct all visible spills (**Section 3.0**).
- Provide appropriate secondary containment (**Section 4.3**).

Temporary Stormwater Section

Attachment C

Sequence of Major Activities

Sequence of Construction

Attachment C – Sequence of Major Activities

The Ogden Facility is an existing industrial concrete block manufacturing plant. No further clearing, grubbing, or excavation activities associated with construction are anticipated at this time. Table 3 and Figure 2 from the SWPPP is attached which lists the potential pollutants associated with the industrial activity at this site.

2.0 POTENTIAL POLLUTANT SOURCES

2.1 POTENTIAL POLLUTANTS ASSOCIATED WITH INDUSTRIAL ACTIVITY

The following describes the site layout, characteristics, drainage system, materials and/or practices which may be a source of contaminant migration to the stormwater at the facility. Locations of industrial activities are shown on **Figure 2**. All Figures are located in **Appendix A**.

Table 3. Potential Pollutant Sources

Industrial Activity	Associated Pollutants	Associated Outfall(s)
Vehicle parking	Organic liquids, glycols	001
Battery storage	Sulfuric acid, lead	001
Maintenance area	Organic liquids, acids, soaps, lead, glycols, solvents, paints	001
Truck/equipment washing	Organic liquids, TSS, acid, soaps	001
Equipment painting	TSS, metals, paints, solvents	001
Finished Brick storage	TSS, metals	001
Raw material grinding and screening	TSS, metals	001
Organic liquid storage and/or transfer	Diesel, motor oil, die lube, used oil, hydraulic oil	001
Raw material unloading, transfer, and storage	TSS, metals, manganese oxide, iron oxide, barium carbonate	001

2.2 SPILLS AND LEAKS

No known significant leaks or spills have occurred at this Facility over the previous three years. Additionally, during each Annual Comprehensive Site Compliance Inspection, a certification will be made as to whether a spill has occurred or not occurred at the Facility over the previous year.

0 80 160
SCALE IN FEET

LEGEND

IDENTIFICATION NO.	DESCRIPTION
1	DIESEL TANK
1a	DIESEL TANK PUMPING STATION
1b	PUMPING STATION UNDERGROUND CONTAINMENT SYSTEM
2	PROCESS EQUIPMENT - VARIOUS
3	200 KVa TRANSFORMER
4	HYDRAULIC OIL TANK
5	HYDRAULIC OIL TANK
6	AUTOMATIC TRANSMISSION FLUID TANK
7	AUTOMATIC TRANSMISSION FLUID TANK

NOTES:
GOOGLE EARTH IMAGE DATED DECEMBER 2020

LEGEND

APPROXIMATE WATER FLOW DIRECTION

RECEIVING BODY OF WATER
SEGMENT 1811A UNNAMED CREEK TO DRY COMAL CREEK TO COMAL RIVER (DRY COMAL CREEK IS IMPAIRED FOR BACTERIA)

OGDEN FACILITY RN 100851377

OUTFALL ID	LATITUDE/LONGITUDE
001	29.633692 N -98.259544 W

FOR PERMITTING PURPOSES ONLY

C:\Users\141Sun\Desktop\OMPP\Ogden\Figure 2 - Drainage Map Ogden rslz, alejandro

11/12/2021 9:31 AM

REV.	DATE	DESCRIPTION	BY

TEXAS BOARD OF PROFESSIONAL ENGINEERS REG. NO. F-3407

DRAWING TITLE: **FACILITY LAYOUT**

PROJECT TITLE: **OGDEN FACILITY SCHERTZ, TEXAS**

CLIENT: **MERIDIAN BRICK, LLC OGDEN FACILITY 21445 FM 2252 SCHERTZ, TEXAS 78154**

SCS ENGINEERS
8575 WEST 110TH STREET, SUITE 100
OVERLAND PARK, KANSAS 66210
PH (817) 571-2288 FAX NO. (817) 571-2188

PROJ. NO. 27221255.00 | DSN. BY: ALR | DWN. BY: ALR | CHK. BY: KML | QA RVW BY: KML | APP. BY: TMJ

CADD FILE: FIGURE 2 – DRAINAGE MAP OGDEN

DATE: 11/2021

SCALE: AS SHOWN

FIGURE NO. **2**

Temporary Stormwater Section

Attachment D

Temporary Best Management Practices and Measures

3.0 BEST MANAGEMENT PRACTICES (BMPS)

Best management practices (BMPs) are measures to prevent or mitigate water pollution from sources associated with on-site activities. Storm water controls and BMPs chosen and implemented at the Ogden Facility interrelate to comprise an integrated, facility-wide approach for stormwater pollution prevention. This approach relies heavily on practices employed to prevent an impact to stormwater run-off by industrial activities. This prevention plus the controlled management of run-off discharge complete the water quality program. BMPs utilized at the facility are in accordance with the *Stormwater Best Management Practice Design Guide* (EPA/600/R-04/121B, September 2004). The following BMPs will be incorporated into facility operations.

3.1 MINIMIZE EXPOSURE

Checkmarks indicate BMP is applicable to facility.

BMP	Ogden Facility (RN100851377)	Why appropriate for Facility
Minimize direct exposure of potential contaminants to storm water	✓	The Ogden facility mitigates stormwater exposure by keeping equipment, vehicles, raw materials, and chemical storage under building cover where appropriate. Cleaning operations performed under cover to ensure wash water is properly collected and disposed. Leaks and spills are covered and contained until proper clean-up procedures can be implemented.
Cover materials & equipment stored outside	✓	
Materials, equipment, & activities with potential spills or leaks are contained or diverted prior to discharge	✓	
Prompt cleanup of spills & leaks with dry methods	✓	
Indoor storage of leaky vehicles & equipment	✓	
Vehicle & equipment cleaning operations performed indoors, under cover, or in bermed areas that prevent exposure to storm water	✓	
Ensure wash water drains to appropriate collection system	✓	

3.2 GOOD HOUSEKEEPING

Checkmarks indicate BMP is applicable to facility.

BMP	Ogden Facility (RN100851377)	Why appropriate for Facility
Keep secondary containment structures clean & empty	✓	All waste material accumulated in the industrial production process is properly categorized and disposed of in the appropriate receptacle to prevent contact with rainfall run-off Outfall locations are kept free of debris and/or spills. Impervious areas of the facility such as employee and truck parking or paved materials storage areas around the facility are routinely inspected and cleaned.
Hazardous materials stored in accordance with applicable federal, state, and local regulatory requirements	✓	
Prompt attention to spills & leaks of contaminants that may occur on any exposed soil, vegetation, or paved area	✓	
Prevention of accumulation of liquid or solid chemicals on the ground near storage areas	✓	
Potential contaminants, such as waste materials, aggregates, & chemicals, clearly identified & stored in secure locations in neat & orderly fashion	✓	
Maintain a clean facility	✓	
Clean paved areas of the facility regularly	✓	
Clean vehicles & equipment regularly	✓	
Remove unneeded products & materials from the facility	✓	

3.3 PREVENTATIVE MAINTENANCE

Checkmarks indicate BMP is applicable to facility.

BMP	Ogden Facility (RN100851377)	Why appropriate for Facility
Routine vehicle & equipment inspections to identify potential problems	✓	The Ogden Facility employees are responsible for equipment upkeep and repair, the proper inventory and storage of materials, and the disposal or reuse of materials and parts. Maintaining parts and equipment in good running order can prevent the accidental release of contaminants at the Plant.
Maintain organized inventory of materials used in facility	✓	
Label & track the recycling of waste material (i.e. used oil, spent solvents, antifreeze, batteries)	✓	
Drain filters (oil, diesel, gasoline) and other parts before disposing or recycling	✓	
Utilize drip pans or other types of controls for known leaking vehicles & equipment	✓	
Ensure employees are trained on proper waste control & disposal procedures	✓	

3.4 MANAGEMENT OF RUNOFF

Checkmarks indicate BMP is applicable to facility.

BMP	Ogden Facility (RN 100851377)	Why appropriate for Facility
Promote vegetative growth on the site and at the perimeter	✓	The Ogden facility manages stormwater run-off through a system of controls intended to effectively "treat" the discharge. Implementing the use of sediment settling ponds, silt fences, straw wattles, dust control, and active water control routing and diversion effectively reduces the impacts to water quality. The Facility's Outfall is located at the end of a native grass vegetative swale that also serves as a filter to potential contaminants.
Minimize exposed soil and/or raw materials	✓	
Route storm water drainage away from industrial activities, where possible	✓	
Straw wattles	✓	
Diversion berms	✓	
Silt fence	✓	
Sedimentation pond	✓	
Dust control measures	✓	

3.5 SPILL PREVENTION AND RESPONSE

Consult the Spill Prevention, Control, and Countermeasure (SPCC) Plan for spill prevention and response procedures. The Secondary Containment Discharge Log is included in **Appendix J**. The Ogden Facility's SPCC Plan provides detailed measures to mitigate stormwater exposure to potential spills or leaks.

The SPCC Plan addresses the following areas as required in accordance with the TPDES General Permit:

- Identifies areas where spills could contribute pollutants to stormwater discharges;
- Develops procedures to minimize or prevent contamination of stormwater from spills;
- Requires drums, tanks, and other containers to be clearly labeled;
- Requires that hazardous waste containers that require special handling, storage, use, and disposal are clearly marked;
- Develops specific spill prevention, detection, and clean up procedures and techniques;

- Develops procedures to notify appropriate facility personnel, emergency response agencies, public health, or drinking water supply agencies and other regulatory agencies of a reportable quantity spill or other release of oil or a hazardous substance;
- Makes available to facility personnel materials and equipment necessary for spill clean-up;
- Develops and maintains an inventory of spill cleanup materials and equipment; and
- Incorporates these measures as a part of the employee training program.

Temporary Stormwater Section

Attachment F

Structural Practices

Temporary Best Management Practices

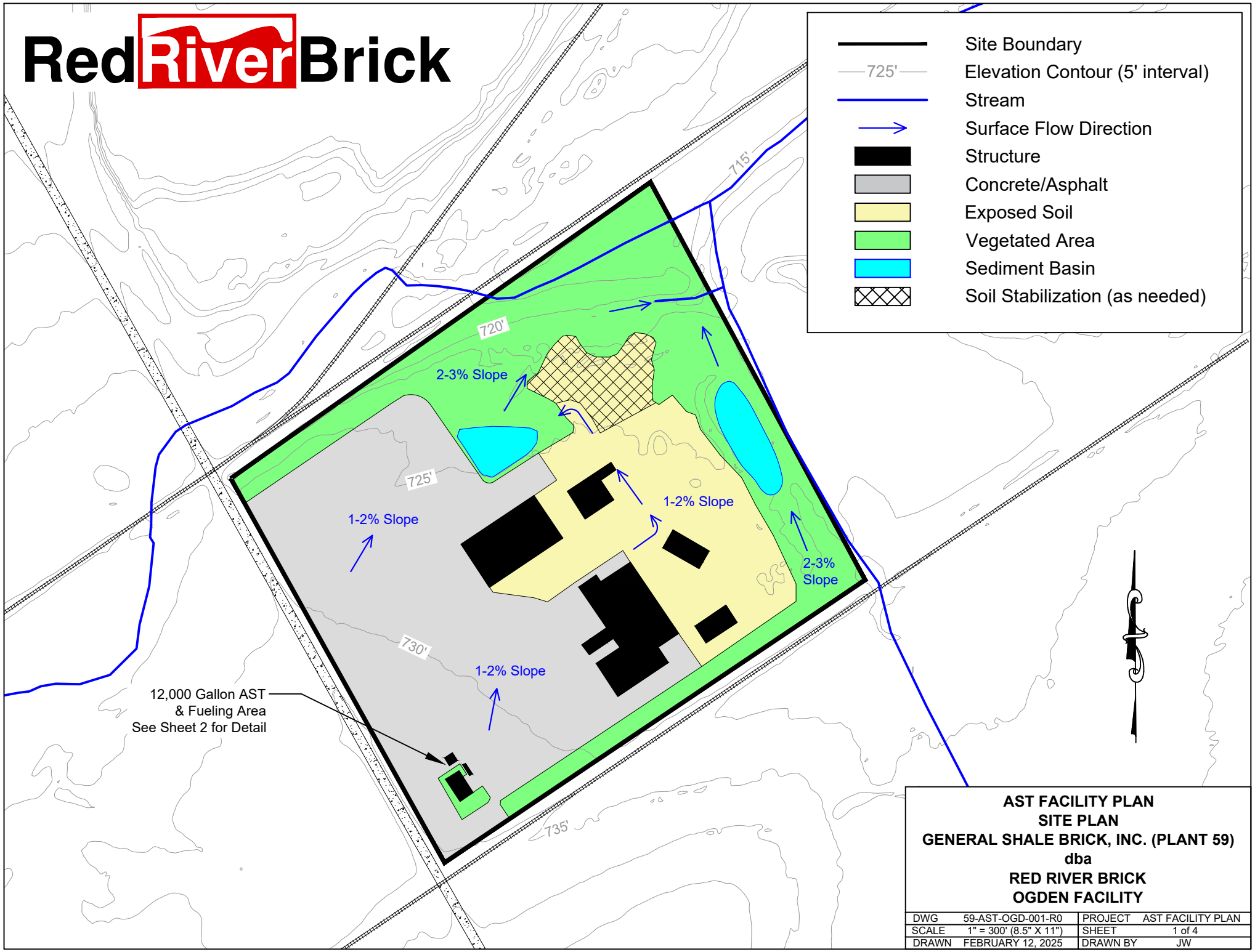
Attachment F – Structural Practices

The Ogden Facility is an existing industrial concrete block manufacturing plant. Much of the area is surfaced with concrete or asphalt. There are two sediment basins and a concrete collection channel depicted in the Drainage Maps included in Attachment G. All drainage passes though NPDES Outfall 001.

Temporary Stormwater Section

Attachment G

Drainage Area Maps



AST FACILITY PLAN
SITE PLAN
GENERAL SHALE BRICK, INC. (PLANT 59)
dba
RED RIVER BRICK
OGDEN FACILITY

DWG	59-AST-OGD-001-R0	PROJECT	AST FACILITY PLAN
SCALE	1" = 300' (8.5" X 11")	SHEET	1 of 4
DRAWN	FEBRUARY 12, 2025	DRAWN BY	JW

0 80 160
SCALE IN FEET

LEGEND

IDENTIFICATION NO.	DESCRIPTION
1	DIESEL TANK
1a	DIESEL TANK PUMPING STATION
1b	PUMPING STATION UNDERGROUND CONTAINMENT SYSTEM
2	PROCESS EQUIPMENT - VARIOUS
3	200 KVa TRANSFORMER
4	HYDRAULIC OIL TANK
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6	AUTOMATIC TRANSMISSION FLUID TANK
7	AUTOMATIC TRANSMISSION FLUID TANK

NOTES:
GOOGLE EARTH IMAGE DATED DECEMBER 2020

LEGEND

APPROXIMATE WATER FLOW DIRECTION

RECEIVING BODY OF WATER
SEGMENT 1811A UNNAMED CREEK TO DRY COMAL CREEK TO COMAL RIVER (DRY COMAL CREEK IS IMPAIRED FOR BACTERIA)

OGDEN FACILITY RN 100851377

OUTFALL ID	LATITUDE/LONGITUDE
001	29.633692 N -98.259544 W

FOR PERMITTING PURPOSES ONLY

C:\Users\141Sun\Desktop\OMPP\Ogden\Figure 2 - Drainage Map Ogden rslz, alejandro

11/12/2021 9:31 AM

REV.	DATE	DESCRIPTION	BY

TEXAS BOARD OF PROFESSIONAL ENGINEERS REG. NO. F-3407

DRAWING TITLE: **FACILITY LAYOUT**

PROJECT TITLE: **OGDEN FACILITY SCHERTZ, TEXAS**

CLIENT: **MERIDIAN BRICK, LLC OGDEN FACILITY 21445 FM 2252 SCHERTZ, TEXAS 78154**

SCS ENGINEERS
8575 WEST 110TH STREET, SUITE 100
OVERLAND PARK, KANSAS 66210
PH (817) 571-2288 FAX NO. (817) 571-2188

PROJ. NO. 27221255.00 | DSN. BY: ALR | DWN. BY: ALR | CHK. BY: KML | QA RVW BY: KML | APP. BY: TMJ

CADD FILE: FIGURE 2 – DRAINAGE MAP OGDEN

DATE: 11/2021

SCALE: AS SHOWN

FIGURE NO. **2**

Temporary Stormwater Section

Attachment I

Inspection and Maintenance for BMPs

5.0 EVALUATIONS AND RECORDKEEPING

5.1 INSPECTIONS

Facility inspection forms are included in **Appendix F.** Routine facility inspections to be performed as required by the Permit consist of the following:

Table 6. Inspection Schedule

Inspection Task	Frequency
Routine Facility Inspection	Monthly
Quarterly Visual Inspection	Quarterly
Comprehensive Site Compliance Inspection	Annually

5.2 STORMWATER DISCHARGE MONITORING

The Ogden Facility's analytical results and Discharge Monitoring Reports (DMRs) are located in **Appendix G.**

Table 7. Permit Sampling Requirements

Facility/Outfall	Frequency	Parameter	Benchmark/ Effluent Limit
Ogden Facility / 001 (RN100851377)	Semi-annual Plant Specific Benchmark	TSS Iron, Total pH	50 mg/L 1.3 mg/L 6.0 – 9.0 S.U.
	Annual General Industrial Effluent Limits	Arsenic Barium Cadmium Chromium Copper Lead Manganese Mercury Nickel Selenium Silver Zinc	0.3 mg/l 4.0 mg/l 0.2 mg/l 5.0 mg/l 2.0 mg/l 1.5 mg/l 3.0 mg/l 0.01 mg/l 3.0 mg/l 0.2 mg/l 0.2 mg/l 6.0 mg/l

- All samples shall be collected from the discharge resulting from a storm event that occurs at least 72 hours from the previous discharge. The grab sample shall be taken during the

first 30 minutes of the discharge. If the collection of a grab sample during the first 30 minutes is impracticable, a grab sample can be taken during the first hour of the discharge. The discharger shall then provide in the monitoring report a description of why a grab sample during the first 30 minutes was not practicable.

- In accordance with the permit, personnel will attempt to collect samples during a "*measurable storm event*". A measurable storm event is described as one that results in an actual discharge from the site.

- The storm water Outfall(s) for the facility is monitored in accordance with the permit requirements. The typical sample type for this site is a grab sample that can be collected directly from flowing water from the Outfall within the first 30 minutes of a discharge resulting from a measurable storm event as described above. If it is not possible to do so, the sample must be collected as soon as practicable after the first 30 minutes and documentation kept with the SWP3 explaining why it was not possible to take the samples within the first 30 minutes.

- Analytical results that exceed a benchmark value are not a violation of the permit, as these values are not numeric effluent limitations. However, not conducting benchmark sampling, not submitting the benchmark monitoring form with sample results, or not submitting the benchmark monitoring form with an explanation as to why the sampling failed to be conducted is a violation of the permit requirements for benchmark monitoring submittal. Exceedances of benchmark values indicate that modifications to the SWP3 and current BMP(s) may be necessary.

- The SWP3 Team will maintain a rain gauge at the Ogden facility to evaluate when a qualifying storm event occurs. The rain gauge will be monitored at least once per week and once per day during storm events. Records of rain gauge monitoring will be maintained at the Ogden facility. Rain gauge monitoring may be suspended during a given monitoring period if a qualifying storm event has occurred and the required sampling and analysis has been conducted.

- In the event a discharge occurs as a result of precipitation greater than the 25-year, 24-hour storm event the discharge is not required to comply with the effluent limitations of this general permit. However, the permittee must submit a DMR to the Department and shall have the burden of proof that discharge was caused by such a precipitation event attached to the DMR.

5.3 SWP3 REVIEW

The SWP3 is a "living" document and must be reviewed on a regular basis, at least annually, and updated to address changes in site conditions (e.g., operational activities, modification and/or addition of new BMPs) and new or revised government regulations. If SWP3 updates are warranted they should be completed within 12 weeks following the completion of the Annual Site Comprehensive Compliance Inspection or as needed due to change in site conditions

The SWP3 Review/Amendment Log located in **Appendix H** should be used to document plan reviews, corrections, revisions, and updates.

5.4 REPORTING AND RECORDKEEPING

5.4.1 Reporting

According to the Permit, semi-annual benchmark and annual sector specific analytical results for stormwater sampling must be submitted to TCEQ before March 31st of each year following sample collection. The results must be submitted online using TCEQ's NetDMR reporting system. If a benchmark waiver is requested after the first two monitoring years, following the NOI submittal, the facility is not required to submit sampling results for monitoring years three and four. However, the facility must have DMRs readily available in case of inspection.

Field notes and laboratory data reports (such as visual inspection forms, sampling logs and lab reports) also do not need to be submitted, but must also be retained with site records.

Semi-Annual Plant Specific Benchmark Reporting

Benchmark monitoring for each constituent related to industrial activity is required from specified outfalls shown on the latest version of **Figure 2 (Appendix A)**. Benchmark monitoring is completed following the submission of the NOI and semi-annually (once during January – June and once during July – December). For 2022 and 2023, results from all outfalls are averaged and reported on the Benchmark Monitoring Form to both the TCEQ by March 31st the following year; if the results for 2022 and 2023 are below benchmark thresholds, then benchmark monitoring requirements are waived for 2024 and 2025 (i.e., the third and fourth years of this permit). Sector E will govern the discharges from the facility, which are listed in Table 8 below. Sector J will govern the discharges from the mines, which has no benchmark limits.

Table 8. Facility Benchmark Monitoring (Sector E)

Pollutants of Concern	Benchmark Concentration
Total Suspend Solids (TSS)	50 mg/L
Iron, Total	1.3 mg/L
pH	6.0 - 9.0 S.U.

Analytical results that exceed benchmark concentrations are not a violation of the General Permit, but indicate that modification of the SWP3 may be necessary. The SWP3 Team will investigate the cause of each sample that exceeds the benchmark concentration, document the results in the SWP3 within 90 days following the sampling event, and make revisions to the SWP3 (i.e., identify additional pollutant sources, implement additional good housekeeping measures and/or BMPs, etc.), if required.

Annual General Industrial Reporting

In addition to Benchmark Monitoring, the site is required to conduct Hazardous Metal Monitoring annually before December 31st at outfalls shown on the latest version of **Figure 2**. Table 9 lists the numeric effluent limitations of hazardous metals in storm water discharges to inland waters that are authorized under the General Permit, and which are required to be monitored for this facility. However, a site can qualify for a waiver by certifying that the facility does not use a raw material, produce an intermediate product, or produce a final product that contains one of the metals presented in Table 9. If a metal is Benchmark Monitored, then the respective metal **cannot** be waived from Hazardous Metal Monitoring.

Table 9. Numeric Effluent Limitations[1]

Hazardous Metal	Daily Maximum[2]
Arsenic	0.3
Barium	4.0
Cadmium	0.2
Chromium	5.0
Copper	2.0
Lead	1.5
Manganese	3.0
Mercury	0.01
Nickel	3.0
Selenium	0.2
Silver	0.2
Zinc	6.0

(1) All limitations represent total concentrations.
(2) Concentrations are referenced from the General Permit for inland waters.

Consistent with the General Permit, Part III.C.1.(c), monitoring results for hazardous metals must be submitted online using the NetDMR reporting system available through TCEQ's State of Texas Electronic Environmental Reporting System (STEERS). A copy of the results submittal will be retained within the SWP3 and will be made readily available for review by authorized TCEQ personnel upon request by March 31st following the annual monitoring period.

According to the Permit, annual analytical results for stormwater sampling will be recorded on Storm Water Annual Reports (SWAR) and kept on file within the SWP3. The permittee must have DMRs readily available in case of inspection.

Field notes and laboratory data reports (such as visual inspection forms, sampling logs and lab reports) also do not need to be submitted, but must also be retained with site records.

5.4.2 Recordkeeping

Sampling records, inspection reports, analytical data, training documentation, incident reports, and documentation of maintenance and repairs of control measures or corrective actions will be kept for a minimum of three (3) years. Related documentation including calibration and maintenance records for meters, and copies of all required reports will be included with retained records.

All records pertaining to the SWP3 are to be maintained on-site. The SWP3 and all associated records must be available for inspection and review. This plan will be retained on-site at the Ogden Facility (RN100851377).

Appendix F

Inspection Forms

F1 – Monthly Site Inspection

F2 – Quarterly Visual Monitoring

F3 – Annual Comprehensive Site Compliance

Appendix F1

Monthly Site Inspection

Pollution Prevention Measures & Controls

Routine Facility Inspections							
Name of Control/Measure:							
Inspector:_____ Inspection Date and Time:				**Quarter**			
				1	**2**	**3**	**4**
Inspection Element	**Evaluated**		**Findings**	**Corrective Action**			
	Yes	**No**					
Good housekeeping measures							
Spill prevention & response							
Erosion control measures							
Maintenance or repairs for structural controls							
Best management practices							
Employee training & education program							

_____

Signature

Worksheet 14

Appendix F2

Quarterly Visual Monitoring

Quarterly Visual Monitoring Form

Fill out a separate form for each sample you collect (**one form per outfall**).

Outfall number:	**Person collecting/examining sample:**	
Quarter/year:	**Date & time collected:**	**Date & time examined:**
Rainfall amount:	**Qualifying:** Yes or No	**Runoff source:** rainfall or snowmelt

Color	Does the water appear to be colored? **Yes** **No**	**Describe:**
Clarity	Is the water clear or transparent, meaning can you see through it? **Yes** **No**	Which of the following best describes the clarity of the water? **Clear** **Milky** **Opaque** Other (describe) _____
Oil sheen	Can you see a rainbow effect or sheen on the water surface? **Yes** **No**	Which of the following best describes the water 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 settled at the bottom of the sample? **Yes** **No**	**Describe:**
Foam	Is there foam or material forming on top of the water? **Yes** **No**	**Describe:**

Detail any concerns, corrective actions taken, and any other obvious indicators of pollution present in the sample:

Collector's signature:

Example: Quarterly Visual Monitoring Form

Fill out a separate form for each sample you collect (**one form per outfall**).

Outfall number: 1	**Person collecting/examining sample:** Scott Doitall	
Quarter/year: Q2/03	**Date & time collected:** 8/31/17, 10 a.m.	**Date & time examined:** 8/31/17, 10:15 a.m.
Rainfall amount: 0.25 inches	**Qualifying:** (Yes) or No	**Runoff source:** (rainfall) or snowmelt

Color	Does the water appear to be colored? **(Yes)** **No**	**Describe:** water is brown
Clarity	Is the water clear or transparent, meaning can you see through it? **Yes** **(No)**	Which of the following best describes the clarity of the water? **Clear** **Milky** **Opaque** water is cloudy or muddy looking
Oil Sheen	Can you see a rainbow effect or sheen on the water surface? **Yes** **(No)**	Which of the following best describes the water sheen? **Oily** **Silver** **Iridescent** N/A
Odor	Does the sample have an odor? **(Yes)** **No**	**Describe:** The sample smells like soil or dirt
Floating solids	Is there something floating on the surface of the sample? **Yes** **(No)**	**Describe:** N/A
Suspended solids	Is there something suspended in the water column or sample? **(Yes)** **No**	**Describe:** There is silt/dirt in the water column
Settled solids	Is there something settled at the bottom of the sample? **Yes** **(No)**	**Describe:** After the sample sat for awhile, silt settled to the bottom of the container
Foam	Is there foam or material forming on top of the water? **Yes** **(No)**	**Describe:** N/A

Detail any concerns, corrective actions taken, and any other obvious indicators of pollution present in the sample:

Collector's Signature:

Appendix F3

Annual Comprehensive Site Compliance

COMPREHENSIVE SITE COMPLIANCE EVALUATION

General Information			
Facility Name and RN			
Date of Inspection		Start/End Time	
Inspector's Name(s)			
Inspector's Title(s)			

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection?
❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time of inspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
1		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
5		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
8		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
9		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
10		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	Equipment operations and maintenance areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	Fueling areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	Outdoor vehicle and equipment washing areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
5	Waste handling and disposal areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	Erodible areas/construction	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	Non-stormwater/ illicit connections	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	Salt storage piles or pile containing salt	❑Yes ❑No ❑ N/A	❑Yes ❑No	
9	Dust generation and vehicle tracking	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	All non-structural controls (e.g., good housekeeping measures, scheduling, etc.)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	All areas where spills and leaks have occurred in the past three (3) years	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	All reasonably accessible areas immediately downstream of each outfall that is authorized under this general permit	❑Yes ❑No ❑ N/A	❑Yes ❑No	
13	Industrial materials, residue, or trash that may have or could come into contact with stormwater	❑Yes ❑No ❑ N/A	❑Yes ❑No	
14	Leaks or spills from industrial equipment, drums, tanks, and other containers	❑Yes ❑No ❑ N/A	❑Yes ❑No	

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
15	Tracking or blowing of raw, final, or waste materials from area of no exposure to exposed area	❑Yes ❑No ❑ N/A	❑Yes ❑No	
16	Evidence of, or the potential for, Pollutants entering the drainage system	❑Yes ❑No ❑ N/A	❑Yes ❑No	
17	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
18	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
19	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"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 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."

Print name and title:

_____

Signature:_____**Date:**_____

Temporary Stormwater Section

Attachment J

Schedule of Interim and Permanent Soil Stabilization Practices

Soil Stabilization Practices

Attachment J – Schedule of Interim and Permanent Soil Stabilization Practices

The Ogden Facility is an existing industrial concrete block manufacturing plant. Much of the area is surfaced with concrete or asphalt. No further construction involving earth moving activity is anticipated at this time. There is a small area located at the northern corner of the property where ditch cleanings and spoil from the plant is stockpiled. This drainage in this area will be maintained to ensure that all runoff report to the respective sediment basin.

GENERAL SHALE

Geologic Assessment (GA)

Ogden Facilty
21455 FM 2252
Comal County, Texas

Submitted to: General Shale

Prepared By:

WESTWARD
Environmental. Engineering. Natural Resources.
Boerne, Texas
830-249-8284

Date: February 2025
Project No. 11607-002
-JG-

Signature: Jessica Garate

Jessica Garate, P.G. - License No. 15565
TX PG Firm No. 50112
Date: 2/3/2025

STATE OF TEXAS
JESSICA GARATE
GEOLOGY
15565
LICENSED
PROFESSIONAL GEOSCIENTIST

Article I. Geologic Assessment

Texas Commission on Environmental Quality

For Regulated Activities on The Edwards Aquifer Recharge/transition Zones and Relating to 30 TAC §213.5(b)(3), Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Section 1.01 Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. My signature certifies that I am qualified as a geologist as defined by 30 TAC Chapter 213.

Print Name of Geologist: Telephone: 830-249-8284

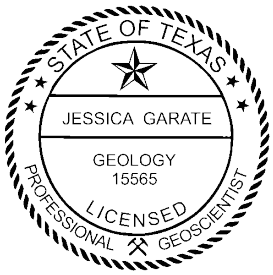
Jessica Garate, P.G. #15565 Fax: 830-249-0221

Date: 2/3/2025

Representing: Westward Environmental, Inc., TBPG Registered Geoscience Firm 50012
(Name of Company and TBPG or TBPE registration number)

Signature of Geologist:

Jessica Garate



Regulated Entity Name: Ogden Facility

Section 1.02 Project Information

1. Date(s) Geologic Assessment was performed: January 23, 2025
2. Type of Project:

   ☐ WPAP ☒ AST
   ☐ SCS ☐ UST

3. Location of Project:

   ☐ Recharge Zone
   ☒ Transition Zone
   ☐ Contributing Zone within the Transition Zone

4. ☒ **Attachment A - Geologic Assessment Table**. Completed Geologic Assessment Table (Form TCEQ-0585-Table) is attached.

5. ☒ Soil cover on the project site is summarized in the table below and uses the SCS Hydrologic Soil Groups* (Urban Hydrology for Small Watersheds, Technical Release No. 55, Appendix A, Soil Conservation Service, 1986). If there is more than one soil type on the project site, show each soil type on the site Geologic Map or a separate soils map.

Article II. Table 1 - Soil Units, Infiltration Characteristics and Thickness

Soil Name	Group*	Thickness(feet)
HeB	D	< 6
Tn	D	> 6

** Soil Group Definitions (Abbreviated)*

A. Soils having a high infiltration rate when thoroughly wetted.

B. Soils having a moderate infiltration rate when thoroughly wetted.

C. Soils having a slow infiltration rate when thoroughly wetted.

D. Soils having a very slow infiltration rate when thoroughly wetted.

6. ☒ **Attachment B – Stratigraphic Column**. A stratigraphic column showing formations, members, and thicknesses is attached. The outcropping unit, if present, should be at the top of the stratigraphic column. Otherwise, the uppermost unit should be at the top of the stratigraphic column.

7. ☒ **Attachment C – Site Geology**. A narrative description of the site-specific geology including any features identified in the Geologic Assessment Table, a discussion of the potential for fluid movement to the Edwards Aquifer, stratigraphy, structure(s), and karst characteristics is attached.

8. ☒ **Attachment D – Site Geologic Map(s)**. The Site Geologic Map must be the same scale as the applicant's Site Plan. The minimum scale is 1": 400'

   Applicant's Site Plan Scale: 1" = 300'
   Site Geologic Map Scale: 1" = 300'
   Site Soils Map Scale (if more than 1 soil type): 1" = 300'

9. Method of collecting positional data:

   ☒ Global Positioning System (GPS) technology.
   ☐ Other method(s). Please describe method of data collection: _____

10. ☒ The project site and boundaries are clearly shown and labeled on the Site Geologic Map.
11. ☒ Surface geologic units are shown and labeled on the Site Geologic Map.
12. ☒ Geologic or manmade features were discovered on the project site during the field investigation. They are shown and labeled on the Site Geologic Map and are described in the attached Geologic Assessment Table.

    ☐ Geologic or manmade features were not discovered on the project site during the field investigation.
13. ☐ The Recharge Zone boundary is shown and labeled, if appropriate. (Not Applicable)
14. All known wells (test holes, water, oil, unplugged, capped and/or abandoned, etc.): If applicable, the information must agree with Item No. 20 of the WPAP Application Section.

    ☐ There are __ (#) wells present on the project site and the locations are shown and labeled. (Check all of the following that apply.)
    - ☐ The wells are not in use and have been properly abandoned.
    - ☐ The wells are not in use and will be properly abandoned.
    - ☐ The wells are in use and comply with 16 TAC Chapter 76.

    ☒ There are no wells or test holes of any kind known to exist on the project site.

Section 2.01 Administrative Information

15. ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

Attachment A

Geologic Assessment Table (Form TCEQ-0585-Table)

GEOLOGIC ASSESSMENT TABLE

PROJECT NAME: OGDEN FACILITY

LOCATION			FEATURE CHARACTERISTICS												EVALUATION			PHYSICAL SETTING		
1A	1B *	1C*	2A	2B	3	4			5	5A	6	7	8A	8B	9	10		11		12
FEATURE ID	LATITUDE	LONGITUDE	FEATURE TYPE	POINTS	FORMATION	DIMENSIONS (FEET)			TREND (DEGREES)	DIG	DENSITY (NO/FT)	APERTURE (FEET)	INFILL	RELATIVE INFILTRATION RATE	TOTAL	SENSITIVITY		CATCHMENT AREA (ACRES)		TOPOGRAPHY
						X	Y	Z		10					10	<40	>40	<1.6	>1.6	
S-1	29.632212	-98.258154	CD	5	Kpg	400	30	2	N/A				F, V	5	10	X		X		Floodplain
S-2	29.632347	-98.260301	CD	5	Kpg	175	100	2	N/A				F, V	5	10	X			X	Floodplain

* DATUM: NAD 83

2A TYPE	TYPE	2B POINTS
C	Cave	30
SC	Solution cavity	20
SF	Solution-enlarged fracture(s)	20
F	Fault	20
O	Other natural bedrock features	5
MB	Manmade feature in bedrock	30
SW	Swallow hole	30
SH	Sinkhole	20
CD	Non-karst closed depression	5
Z	Zone, clustered or aligned features	30

8A INFILLING	
N	None, exposed bedrock
C	Coarse - cobbles, breakdown, sand, gravel
O	Loose or soft mud or soil, organics, leaves, sticks, dark colors
F	Fines, compacted clay-rich sediment, soil profile, gray or red colors
V	Vegetation. Give details in narrative description
FS	Flowstone, cements, cave deposits
X	Other materials

12 TOPOGRAPHY
Cliff, Hilltop, Hillside, Drainage, Floodplain, Streambed

I have read, I understood, and I have followed the Texas Commission on Environmental Quality's Instructions to Geologists. The information presented here complies with that document and is a true representation of the conditions observed in the field.

My signature certifies that I am qualified as a geologist as defined by 30 TAC Chapter 213.

Jessica Garate

Date 2/3/2025

STATE OF TEXAS
JESSICA GARATE
GEOLOGY
15565
LICENSED
PROFESSIONAL GEOSCIENTIST

Attachment B

Stratigraphic Column

Generalized Stratigraphic Column

Hydrogeologic subdivision			Group formation or member			Hydrologic Function	Thickness (feet)	Lithology	Cavern development	Porosity / permeability type
Quaternary			Alluvium			AQ	0-30	Siltstone to sandstone	None	High porosity/high permeability
			Fluviatile terrace deposits			AQ where saturated	0-45	Coarse gravel, sand, and sitl	None	High porosity/high permeability
Upper Cretaceous	Upper confining units		Navarro and Taylor Groups, undivided			CU	600	Clay, chalky limestone	None	Low porosity / low permeability
			Austin Group			CU; rarely AQ	130-150	White to gray limestone	None	Low porosity; rare water production form fractures / low permeability
			Eagle Ford Group			CU	30-50	Brown, flaggy shale and agrillaceous limesone	None	Primary porosity lost / low permeability
			Buda Limestone			CU	40-50	Buff, light gray, dense mudstone	Minor surface karst	Low porosity / low permeability
			Del Rio Clay			CU	40-50	Blue-green to yellow-brown clay	None	Low porosity / low permeability
Lower Cretaceous	I	Edwards Aquifer	Georgetown Formation			Karst AQ; not karst CU		Reddish-brown, gray to light tan marly limestone	None	Low porosity / low permeability
	II		Edwards Group	Person Fm	Cyclic & marine members undivided	AQ	89-90	Mudstone to packstone; miliolid grainstone; chert	Many sub-surface	Laterally extensive; water yielding
	III				Leached & collapsed members	AQ	70-90	Crystalline limestone; mudstone to grainstone; chert collapsed breccia	Extensive lateral development; large rooms	Majority not fabric / one of the most permeable
	IV				Regional dense members	CU	20-24	Dense, argillaceous mudstone	Very few; only vertical fracture enlargement	Not fabric / low permeability; vertical barrier
	V			Kainer Fm	Grainstone member	AQ	50-60	Miliolid grainstone; mudstone to wackestone; chert	Few	Not fabric / recrystallization reduces permeability
	VI				Kirschberg evaporite member	AQ	50-60	Highly altered crystalline limestone; chalky mudstone; chert	Probably extensive cave development	Majority fabric / one of the most permeable
	VII				Dolomitic member	AQ	110-130	Mudstone to grainstone; crystalline limestone; chert	Caves related to structure or bedding planes	Mostly not fabric; some bedding plane fabric / water-yielding
	VIII				Basal nodular member	Karst AQ; not karst CU	50-60	Shaly, nodular limestone; mudstone and miliolid grainstone	Large lateral caves at surface	Fabric; stratigraphically controlled/ large conduit flow at surface; no permeability in subsurface
	Lower confining unit		Upper member of the Glen Rose Limestone			CU; evaporite beds AQ	350-1150	Yellowish tan, thinly bedded limestone and marl. Thick massive limestone baed at base.	Some surface cave development.	Some water production at evaporite beds / relatively impermeable
			Lower Member of the Glen Rose Limestone							

Adapted from:

U.S.G.S. Geologic Framework and Hydrogeologic Characteristics of the Edwards Aquifer Recharge Zone, Bexar County, Texas; Water-Resources Investigations Report 95-4030

Texas Board of Water Engineers, Geology and Ground Water Resources of Comal County, Texas (1947)

Note: CU = Confining Unit; AQ = Aquifer

Indicates Mapped Surface Formation

Attachment C

Site Geology (Geologic Narrative)

Geologic Narrative

1.0 PURPOSE

Westward Environmental, Inc. (WESTWARD) was retained by General Shale (Client) to prepare a Geologic Assessment (GA) on a 32.15-acre tract referred to as the Ogden Facility (Site). This GA was prepared as a required attachment to an Aboveground Storage Tank (AST) Plan for the Site as required by the Texas Commission of Environmental Quality (TCEQ).

2.0 REGULATORY GUIDANCE

Title 30, Chapter 213 of the Texas Administrative Code

This report was prepared in accordance with *Instructions for Geologists for Geologic Assessments on the Edwards Aquifer Recharge/Transition Zones (TCEQ-0585 (Rev. 10-01-04))* to be reviewed pursuant to Title 30, Chapter 213 of the Texas Administrative Code.

3.0 PROJECT LOCATION

The Site address is listed as 21455 FM 2252 in Schertz, Comal County Texas. It is located approximately 1 mile northwest of Interstate 35. The Site is located over the Edwards Aquifer Transition Zone (EATZ).

4.0 METHODOLOGY

As part of the GA, WESTWARD performed a desktop review of selected published information. WESTWARD also conducted a field investigation in accordance with *TCEQ-0585 (Rev. 10-01-04)*.

4.1 Desktop Review

WESTWARD conducted a review of aerial imagery, the University of Texas Bureau of Economic Geology (BEG) Geologic Atlas of Texas (GAT) San Antonio Sheet, applicable U.S. Geological Survey (USGS) Topographic quadrangle(s) and geospatial dataset(s), the Texas Natural Resources Information System (TNRIS), the Texas Water Development Board's Water Data Interactive Groundwater Data Viewer (TWDB Viewer), the Railroad Commission of Texas (RRC), and the U.S. Department of Agriculture (USDA) National Resource Conservation Service (NRCS) Web Soil Survey prior to the field investigation.

4.2 Field Investigation

A field investigation was performed at the Site by WESTWARD geologist Jessica Garate, P.G. (TBPG Lic. No. 15565) on January 23, 2025. Field transects of the Site were walked in accordance with TCEQ-0585 (rev. 10-01-04).

5.0 DESKTOP REVIEW

The desktop review was utilized for preliminary planning of the field investigation. The accuracy of the desktop review was limited by the accessibility, scale, and age of the data available.

5.1 Published Surface Geology

A review of published geologic maps revealed one (1) geologic unit mapped at the Site. It is the Late Cretaceous-aged Pecan Gap Chalk (Kpg), a member of the Taylor Group. The unit is shown on the Site Geologic Map (Attachment D).

5.2 Published Structure

The Site is located within the Balcones Fault Zone (BFZ). There are no faults mapped at the Site as it is located between fault lines. The desktop review revealed the closest mapped fault is approximately 1,800 ft. to the northwest with a southwest to northeast trend at approximately 56°. This trend was used to determine the dominant fault trend range at this Site, which for the purpose of this assessment, is approximated to be between 41° and 71°.

5.3 Karst Features

The desktop review did not reveal karst features within the Site.

5.4 Non-karst & Manmade Features

The desktop review of aerial imagery revealed a pond on the northcentral part of the Site that appears to receive stormwater water flow from the facility. A review of the TWDB Viewer did not reveal any onsite groundwater wells at the Site.

5.5 Soils

Two (2) soil units were identified on the Site through the NRCS Web Soil Survey. They are detailed below as well as included on the Geologic Assessment Form TCEQ-0585 (Rev. 02-11-15). A Site Soils Map is included in Attachment D.

Published Soil Unit Descriptions

Soil Name	*Group*	*Thickness (Feet)*	*Description*
Heiden clay (HeB), 1 to 3 percent slopes	D	< 6	40 to 65 inches to densic material, well drained, very low to moderately low (0.00 to 0.06 in/hr) Ksat capacity
Tinn clay (Tn), 0 to 1 percent slopes, frequently flooded	D	> 6	More than 80 inches to restrictive feature, moderately well drained, very low to moderately low (0.00 to 0.06 in/hr) Ksat capacity

6.0 FIELD INVESTIGATION

The field investigation was performed on January 23, 2025 by Jessica Garate, P.G. to verify the presence or absence of recharge features identified in the desktop review and to identify recharge features not found during the desktop review. Field reconnaissance was performed in accordance with the *TCEQ-0585-Instructions (Rev. 10-1-04)*.

6.1 Surface Geology

Most of the Site has been developed and the remainder is covered with dense vegetation which made identification of the surface geologic formation difficult. The Kpg was not positively identified in the field as there was no exposed bedrock on Site. It is included as mapped on the attached Site Geologic Map.

6.2 Structure

No evidence of structural features were observed at the Site.

6.3 Karst Features

There were no karst features identified and recorded during the field investigation.

6.4 Non-karst & Manmade Features

Two (2) non-karst closed depressions were identified and recorded during the field investigation. None of these features are rated sensitive.

6.5 Feature Descriptions

S-1 (CD) **Not Sensitive**

Feature S-1 is a non-karst closed depression located adjacent to the drainage on the eastern part of the Site. The feature measures approximately 400 ft. x 30 ft. x 2 ft. and has a vegetated floor with abundant tree litter. The catchment area of the feature is less than 1.6 acres, and the interpreted probability of rapid infiltration is low. This feature is rated not sensitive.

S-2 (CD) **Not Sensitive**

Feature S-2 was identified in the Desktop Review as a stormwater pond located on the northcentral part of the Site and is classified as a non-karst closed depression. The feature receives surface flow from the facility via drainage ditches that flow into two separate inlets. There is also an outfall structure that diverts the water into a stream that ultimately flows into Dry Comal Creek. The feature measures approximately 175 ft. x 100 ft. x 2 ft. and has a fine-grained soil floor that is heavily vegetated. The catchment area of the feature is greater than 1.6 acres, and the interpreted probability of rapid infiltration is low. This feature is rated not sensitive.

SELECT PHOTOGRAPHS

Ground conditions on most of the developed part of the Site.

S-1: Non-karst closed depression located on the eastern part of the Site.

S-2: Pond classified as a non-karst closed depression that receives water diverted from the Site.

S-2: Drainage ditch on the northcentral part of the Site diverting flow to S-2.

Attachment D

Site Geologic Map
Site Soils Map

SITE GEOLOGIC MAP

OGDEN FACILITY
GENERAL SHALE
SCHERTZ, COMAL COUNTY, TEXAS

SHEET NO.: 001 OF 001

IMAGE: ESRI WORLD IMAGERY	
ISSUE DATE:	01/30/2025
DRAWN BY:	JG
CHECKED BY:	JJS
SCALE: 1" =	300'
JOB NO.:	11607-002

REV.	DESCRIPTION	BY	DATE

STATE OF TEXAS
JESSICA GARATE
GEOLOGY
15565
LICENSED
PROFESSIONAL GEOSCIENTIST

2/3/2025

Jessica Garate

WESTWARD
Environmental. Engineering. Natural Resources.
P.O. Box 2205, Boerne, Texas 78006
(830) 249-8284 Fax: (830) 249-0221
TBPE REG. NO.: F-4524
TBPG REG. NO.: 50112

SITE SOILS MAP

OGDEN FACILITY
GENERAL SHALE
SCHERTZ, COMAL COUNTY, TEXAS

SHEET NO.: 001 OF 001

IMAGE: ESRI WORLD IMAGERY	
ISSUE DATE:	01/28/2025
DRAWN BY:	JG
CHECKED BY:	JJS
SCALE: 1" =	300'
JOB NO.:	11607-002

REV.	DESCRIPTION	BY	DATE

STATE OF TEXAS
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15565
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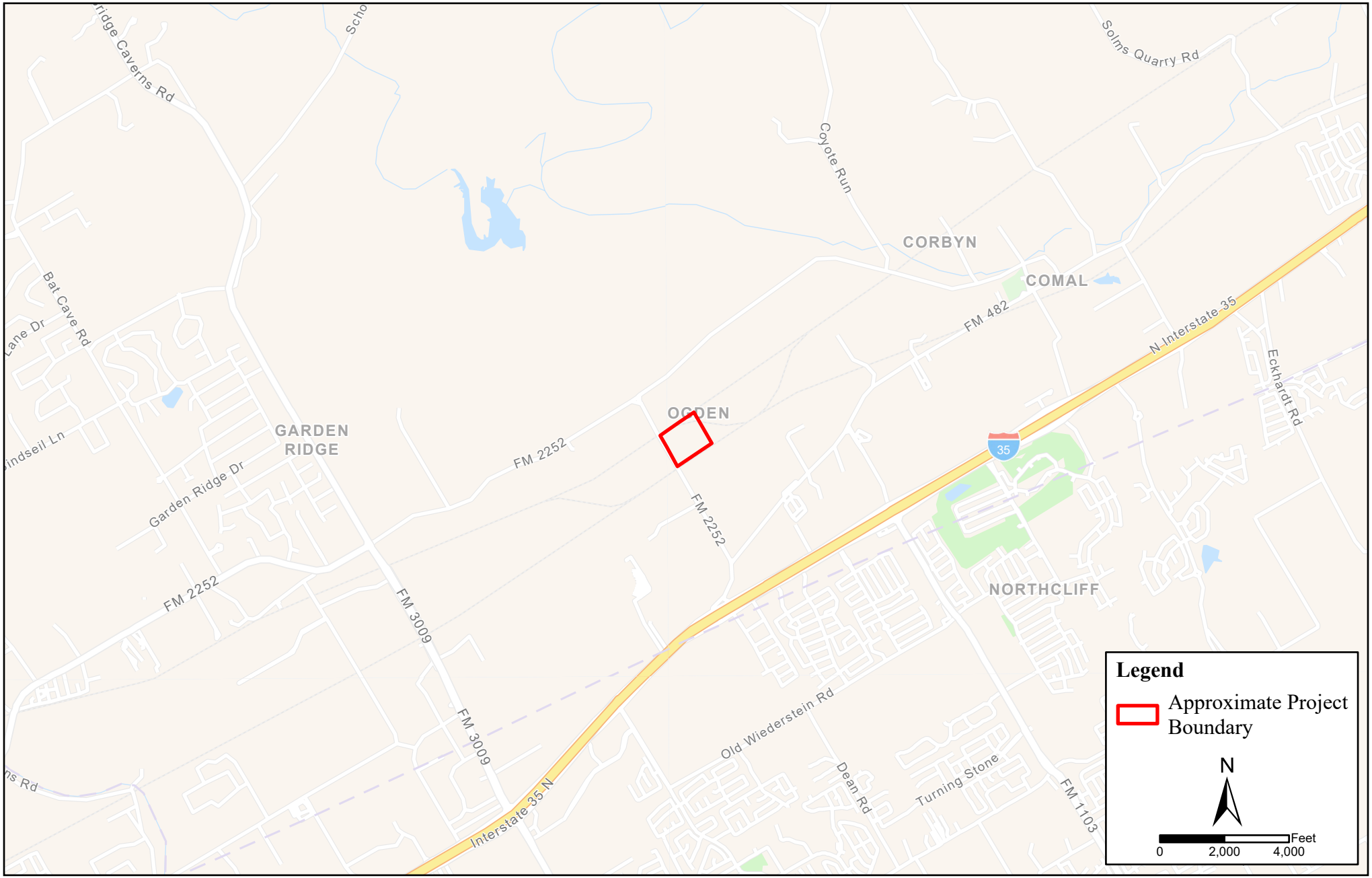

SHEET NO.: 001
OF 001

IMAGE:	ESRI WORLD NAVIGATION MAP
ISSUE DATE:	01/30/2025
DRAWN BY:	JG
CHECKED BY:	JJS
SCALE: 1" =	4,000'
JOB NO.:	11607-002

ROAD MAP

OGDEN FACILITY
GENERAL SHALE
SCHERTZ, COMAL COUNTY, TEXAS

REV.	DESCRIPTION	BY	DATE

STATE OF TEXAS
JESSICA GARATE
GEOLOGY
15565
LICENSED
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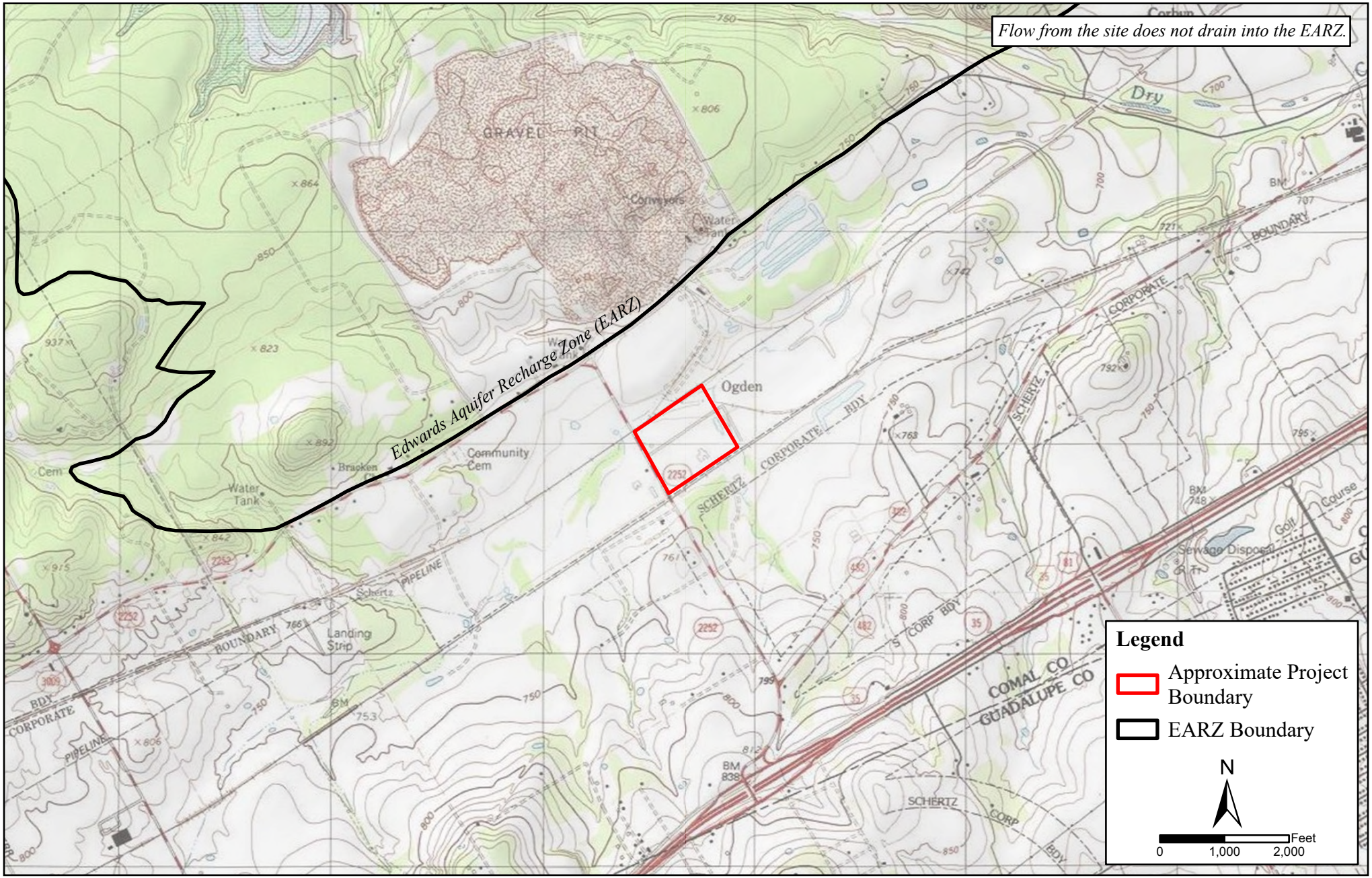

SHEET NO.:
001
OF 001

IMAGE:	USGS 7.5 TOPO QUAD BAT CAVE, TX
ISSUE DATE:	01/30/2025
DRAWN BY:	JG
CHECKED BY:	JJS
SCALE: 1" =	2,000'
JOB NO.:	11607-002

USGS MAP

OGDEN FACILITY
GENERAL SHALE
SCHERTZ, COMAL COUNTY, TEXAS

REV.	DESCRIPTION	BY	DATE

STATE OF TEXAS
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Spill Prevention, Control, and Countermeasure Plan (SPCC Plan)

Ogden Facility
21455 FM 2252
Schertz, Texas 78154
(830) 620-4497

SCS ENGINEERS

27221255.00 | June/October 2022

8575 West 110th Street, Suite 100
Overland Park, Kansas 66210
913-681-0030

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Section Page

Tables

Appendices

MANAGEMENT APPROVAL AND COMMITMENT OF RESOURCES

The Meridian Brick LLC - Ogden Facility (Facility) is committed to preventing discharges of oil to navigable waters and the environment through the implementation of this Spill Prevention, Control, and Countermeasure (SPCC) Plan. This SPCC Plan has the full approval of Facility management. By signing this page, Facility management commits to provide the personnel, equipment, and materials required to expeditiously control and remove any harmful quantity of oil discharged.

I certify that this SPCC Plan has my full approval and that I have the authority to commit the necessary resources to implement the plan. I further attest that to the best of my knowledge, the information contained in this plan is true, complete, and accurate.

Name	Signature
Title	Date

SPCC PLAN CERTIFICATION

CERTIFICATION BY A PROFESSIONAL ENGINEER

By means of this certification, I hereby certify and attest that I am familiar with the requirements of the Oil Pollution Act SPCC regulations (Code of Federal Regulations, Title 40, Part 112 [40 CFR 112]), that I or my designated agent has visited and examined the Facility, that this SPCC Plan has been prepared in accordance with good engineering practice including consideration of applicable industry standards, the local standard of care, and with the requirements of this Part; that procedures for required inspections and testing have been established; and that the plan is adequate for the facility.

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112. This SPCC Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this SPCC Plan.

Dillon Baird, P.E.

Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

140103	**TX**	6-3-2022
Registration Number	State	Date

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Facility Name: **Meridian Brick LLC – Ogden Facility**
Facility Address: **21455 FM 2252**
Facility Location: **Schertz, Texas 78154**

	Yes	No
1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons **and** do the operations include over water transfers of oil to or from vessels?		X
2. Does the facility have a maximum storage capacity greater than or equal to 1,000,000 gallons **and** does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area?		X
3. Does the facility have a maximum storage capacity greater than or equal to 1,000,000 gallons **and** is the facility located at a distance such that a discharge from the facility could cause injury to an environmentally sensitive area?		X
4. Does the facility have a maximum storage capacity greater than or equal to 1,000,000 gallons **and** is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?		X
5. Does the facility have a maximum storage capacity greater than or equal to 1,000,000 gallons **and** within the past 5 years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?		X

A certification of substantial harm determination is required within the SPCC Plan to document if a Facility Response Plan is required for the facility under 40 CFR 112.20. Since all answers to the questions above are "no," this facility is not required to prepare a Facility Response Plan based on the amount of petroleum products contained on site.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Name (please type or print) _____ Signature _____

Title _____ Date _____

Note: If an alternative formula is used in questions 3 and 4, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

1.0 INTRODUCTION

The purpose of this Spill Prevention Control and Countermeasures (SPCC) Plan (the Plan) is to address the storage and management of oil and petroleum products at the Ogden Facility (Facility). The Facility is owned by Meridian Brick LLC.

This Plan is designed to fulfill the requirements of 40 CFR 112, U.S. Environmental Protection Agency (USEPA) Oil Pollution Prevention Regulations. This Plan describes the Facility's practices, procedures, structures, and equipment to prevent spills and mitigate or preclude adverse impacts on the environment.

1.1 APPLICABILITY

The Clean Water Act Oil Pollution Prevention regulation (Code of Federal Regulations, Title 40, Part 112 [40 CFR 112]) as issued by the United States Environmental Protection Agency (EPA) aims to prevent the discharge of oil into or upon the navigable waters or adjoining shorelines of the United States.

A cross-reference checklist identifying how this Plan complies with the SPCC regulation is provided in **Appendix B**.

The SPCC regulation applies to all oil products, including, but not limited to:

- Fats, oils, or greases of animal, fish, or marine mammal origin
- Vegetable oils, including oils from seeds, nuts, fruits, or kernels
- Other oils and greases including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

A facility is subject to SPCC regulation if, due to its location, the facility could reasonably be expected to discharge oil in quantities that may be harmful into or upon navigable waters or adjoining shorelines of the United States and the aggregate:

- Aboveground oil storage capacity exceeds 1,320 gallons in containers with volumes of 55 gallons or greater, **or**
- Underground oil storage capacity of the facility exceeds 42,000 gallons—excluding sources that are currently subject to all technical requirements of 40 CFR 280 or all technical requirements of state programs approved under 40 CFR 281.

Because the facility has more than 1,320 gallons of oil (see **Table 1** on **page 4**) in containers with a capacity of 55 gallons or greater (sources), this SPCC Plan was prepared and will be implemented consistent with the current version of 40 CFR 112.

This SPCC Plan is used as a:

- Reference for proper oil storage
- Tool for spill prevention
- Guide for facility inspections and tank testing
- Resource during emergency response to control, contain, and clean up an oil release

1.2 KEY FACILITY INFORMATION

Name of the Facility:	Ogden Facility
Name of Owner:	Meridian Brick LLC
Facility Address:	21455 FM 2252 Schertz, Texas 78154
Telephone	(830) 620-4497
Facility Manager:	Robert Asencio
Name, direction, and distance to the nearest body of water:	Segment 1811A unnamed creek to Dry Comal Creek to Comal River located approximately 1.4 miles northeast of the Facility. The Site Location Map on **Figure 1** shows the location of the Facility (**Appendix A**). The USGS Topographic Map on **Figure 2** shows the location of the facility relative to Dry Comal Creek.
Facility Emergency Coordinator:	Robert Asencio Plant Manager Office: (830) 310-3627 Cell: (210) 485-8125
Alternate Facility Emergency Coordinator:	David McKeown Director, Environmental Compliance (803) 691-3121
Emergency Spill Response Contractor:	Clean Harbors (210) 304-3000
Location of SPCC Plan:	A complete copy of this SPCC Plan is maintained at the Facility office and is available for on-site review by the USEPA Regional Administrator. This SPCC Plan is not filed with the USEPA.
Next Review Due:	August 2026
Last Review Completed:	August 2022

Facility Oil Sources:	See **Table 1** on the **Page 4.**
Other Oil Sources at Facility not managed under the SPCC Plan:	Two pole-mounted transformers are located near the southwest corner of Facility. The transformers are owned and maintained by the public electric utility provider.
Spill History:	No reportable spills have occurred at the Facility over the previous three years.
Underground Oil Storage:	The Facility has no underground oil storage capacity. However, an underground secondary containment vault is located below the diesel dispenser transfer area. The underground vault is not considered to be a SPCC regulated storage container.
Building Use Description:	The Facility consists of an office building and several plant manufacturing buildings. The locations of the buildings are shown on **Figure 3** (**Appendix A**). A fueling station consisting of a 12,000-gallon diesel AST and a fuel island with a dispenser is located to the east and north of the office building. A diagram of the diesel AST system is shown on **Figure 4**.
Water Supply	Potable water is supplied by the City of Shertz.
Wastewater	Sanitary wastewater is discharged from the Facility through the sanitary sewer system. No process wastewater is generated at the facility.
General Area Description	The Facility is located in a primarily industrial area.

Figures are located in **Appendix A.**

Table 1. Oil Storage Capacity and Plan Details
Meridian Brick LLC - Ogden Facility
21455 FM 2252, Schertz, Texas 78154

ID	Oil Source Volume (gal)	Location	Container Construction	Contents	Year Installed (estimated)	Incoming Transfer Activities (material into tank/onto site)	Outgoing Transfer Activities (material from tank/use on site)	Distance and Direction to Nearest Receptor	Spill Prevention and Leak Detection	Secondary Containment	Overfill Protection	Spill Countermeasures and Response Materials	Tank Security [1]	Inspection and Integrity Testing Schedule
Aboveground Storage Tanks														
Tank 1	12,000	Located near the southwest corner of the Facility next to facility fueling station and adjacent to Transportation Office building..	Factory built, painted, double-walled steel horizontal storage tank supported on steel skids	Diesel (red) fuel	2006	Filled by a 3rd party vendor. Tanker trucks deliver fuel to site and fill tank through remote fill box containing cam-lock hose connection, shut-off valve, and back-flow valve.	Fuel is transferred to facility vehicles and equipment through a standard fuel dispenser and nozzle located adjacent to the diesel AST. Aboveground and belowground piping transfers fuel from the AST to the dispenser	An underground fuel containment system is located approximately 20 feet northwest of the AST. The area around the fuel transfer area of the AST would likely drain to this containment system.	**Spill Prevention:** Level gauge, overfill alarm, and remote fill box containment. **Leak Detection:** Leak detection monitoring is provided by a sensor located in the interstitial space of the AST. The AST is located on a concrete surface.	Double-walled	Direct visual level gauge on tank and audible overfill alarm. .	A spill kit is located near the AST. An emergency shut-off switch for the fuel system is located on the wood fence on the west side of the office building. A fire extinguisher is mounted on a post next to the AST.	The remote fill box is kept locked. A ley code is required to activate the fuel dispenser. Adequate lighting is present around the AST and fuel transfer areas.	**Inspections:** Monthly (see Appendix D). **Integrity Testing:** Formal External Inepsection every 20 years. (see Section 4.5.2) First epection scheduled for 2026.
Tank 2	350	Located near the southeast corner of the Facility under a roof with open sides.	Factory built, single wall.	Hydraulic Fluid	Unknown - Facility to verify. Completed on _____	Filled by a 3rd party vendor from transfer truck. Fill through port on top of tank.	Electric pump with transfer hose located on top of tank.	Overland flow towards the north/northeast	**Spill Prevention:** Prudent practices of oil transfer. Located in secondary containment structure. **Leak Detection:** The tank is located on top of an elevated grate over an concrete secondary containment structure that allows for visual leak detection.	Concrete secondary containment structure. (>1,000 gallons)	None - A visual level gauge and/or audible alarm should be installed on the tank. Completed on_____	A spill kit should be provided next to the AST. Completed on _____	The tank located at the Facility that is not visible from the general public. Locks on the fill ports and the pump switch should be provided. Completed on _____	**Inspections:** Monthly (see Appendix D). **Integrity Testing:** None required
Tank 3	350	Located near the southeast corner of the Facility under a roof with open sides.	Factory built, single wall.	Hydraulic Fluid	Unknown - Facility to verify. Completed on _____	Filled by a 3rd party vendor from transfer truck. Fill through port on top of tank.	Unknown - Facility to verify . Completed on _____	Overland flow towards the north/northeast	**Spill Prevention:** Prudent practices of oil transfer. Stored in secondary containment structure. **Leak Detection:** The tank is located on top of an elevated grated over an concrete secondary containment structure that allows for visual leak detection.	Concrete secondary containment structure. (>1,000 gallons)	None - A visual level gauge and/or audible alarm should be installed on the tank. Completed on_____	A spill kit should be provided next to the AST. Completed on _____	The tank located at the Facility that is not visible from the general public. Locks on the fill ports and the pump switch should be provided. Completed on _____	**Inspections:** Monthly (see Appendix D). **Integrity Testing:** None required
Potable Containers														
55-Gallon Drums	~ 3 drums at 55-gal each	Located on the north side of the metal building near the southeast corner of the Facility. Drums are located under overhang	Steel	Transmission oil, used oil filters, and motor oil.	varies	Drums can be filled from the top of drum through the bung hole or by removing the lid. Drums may also be replaced when empty with unopen new drums provided by 3rd party vendor.	Hand pump attached to bung hole on top of drums. Physical removal of oil filters by removal of lid.	Overland flow towards the north/northeast	**Spill Prevention:** Secondary containment is provided for the drums. **Leak Detection:** Visual observation on secondary containment and drums.	Secondary containment curbing around drum storage. Curbing should be repaired. Completed on _____	Procedure to follow: 1.) Verify the container has sufficient free capacity for the transfer. 2.) Visually monitor the product level throughout the transfer.	Spill kit located inside building.	Drums are stored in area not visible by the general public.	**Inspections:** Monthly (see Appendix D). **Integrity Testing:** None required.

Table 1. Oil Storage Capacity and Plan Details
Meridian Brick LLC - Ogden Facility
21455 FM 2252, Schertz, Texas 78154

ID	Oil Source Volume (gal)	Location	Container Construction	Contents	Year Installed (estimated)	Incoming Transfer Activities (material into tank/onto site)	Outgoing Transfer Activities (material from tank/use on site)	Distance and Direction to Nearest Receptor	Spill Prevention and Leak Detection	Secondary Containment	Overfill Protection	Spill Countermeasures and Response Materials	Tank Security [1]	Inspection and Integrity Testing Schedule
Oil-Filled Equipment														
Various Hydraulic Plant Equipment	Varies	Located in plant buildings.	Metal/Steel	Hydraulic Oil	varies	Transferred from buckets or drums during maintenance	Transferred to buckets or drums during maintenance	Located inside buildings.	**Spill Prevention:** Routine equipment maintenance, spill buckets or pans during servicing. **Leak Detection:** Visual observation	Buildings provides secondary containment.	Procedure to follow: 1.) Verify the container has sufficient free capacity for the transfer. 2.) Visually monitor the product level throughout the transfer.	Spill kit located inside buildings.	Located inside buildings.	**Inspections:** Monthly (see Appendix D). **Integrity Testing:** None required
Transformers														
Pad Mounted Transformer	640	Outside-north of main plant building.	Steel	Mineral Oil	Unknown	From portable containers if required.	To portable containers if required.	Sheet flow generally to the northeast.	**Spill Prevention:** Located inside transformer enclosure. Transfer of oil to and from transformer is not routinely required. Transformer is only serviced by authorized personnel. **Leak Detection:** Visual observation	Transformer enclosure likely to provide secondary containment	Procedure to follow: 1.) Verify the container has sufficient free capacity for the transfer. 2.) Visually monitor the product level throughout the transfer.	Spill kit located inside main building located south of transformer.	Enclosure panels are kept locked when not being accessed by authorized personnel.	**Inspections:** Per manufacturer recommendations **Integrity Testing:** Per manufacturer recommendations

TOTAL ABOVEGROUND OIL STORAGE (SPCC REGULATED) [2]: approximately 13,500 GALLONS (in 55-gallon containers or larger)

Notes:
(1) The Facility is fenced and gates locked when personnel are not present. All tanks located within Facility perimeter controls.
(2) In addition to the storage listed above, various small containers (5 gallons or less) containing oils, petroleum, and other chemicals and materials are present at the facility. These containers are stored inside and are not regulated by SPCC due to their small size,
Highlighted cells indicates modifications or verifications to be completed by the facility to comply with the SPCC Plan requirements.

2.0 ROLES AND RESPONSIBILITIES

The facility is owned and operated by Meridian Brick LLC. The roles and responsibilities associated with the implementation of this SPCC Plan are as follows:

Emergency Coordinators

The **Facility Emergency Coordinator** is responsible for the following items:

General Implementation

- **Distribute, post, and collect (upon completion) the applicable forms** from the SPCC Plan (e.g., Monthly Inspection Forms and Notice to Petroleum Product Vendors) as they are updated
- **Execute or coordinate the routine monthly inspections** on the respective oil storage containers
- **Coordinate or provide loading/unloading fuel/oil transfer oversight** for transfers completed by third party tank vendors to this facility
- **Coordinate and document annual SPCC training**
- **Review SPCC Plan annually** for changes **(Appendix J)**
- **Maintain SPCC records for a minimum of 3 years**
- **Coordinate SPCC amendments or required 5-year reviews** for the SPCC Plan

Spill Response

- **Implement the appropriate spill response operations** and ensure the use of appropriate personal protective equipment
- **Lead/coordinate emergency oil/fuel spill response team efforts**
- **Ensure the proper disposal of contaminated material**
- **Perform spill reporting,** as necessary, following the procedures provided in this SPCC Plan

Oil-Handling Employees

Oil-handling employees at the facility are responsible for operating and maintaining the oil storage containers at the facility. In relation to the SPCC regulation, these responsibilities include the following:

- **Attend annual SPCC training** (all oil-handling employees)
- **Execute routine monthly inspections** (as assigned)
- **Notify the Facility Emergency Coordinator of any observed oil spills** in order to start the emergency spill response procedure; and
- **Place initial spill countermeasure materials** (from facility spill kit(s) and supplies).

3.0 SPILL RESPONSE

This portion of the SPCC Plan covers the facility's countermeasures to a potential spill and includes actions such as spill notification requirements, spill contents recovery, response, and cleanup.

All oil spills, regardless of size, must be contained and cleaned up in a safe and effective manner.

To determine the proper response procedures, this plan classifies spills as 'incidental,' 'non-incidental,' or 'imminent danger,' depending on the following characteristics:

Table 2. Oil Spill Response Criteria

Incidental Spills	Non-Incidental Spills	Imminent Danger Spills
• The spill is small, less than 1- gallon. • The spill can be easily contained. • The spill is unlikely to reach a navigable waterway, storm sewer, or sanitary drain. • Cleanup procedures do not pose a health or safety hazard. • Proper response equipment is available for a safe cleanup. • Responding personnel have completed annual SPCC training. • Responding personnel are comfortable with cleaning up the spill.	• The spill is large enough to spread beyond the immediate area (generally 1 to 20 gallons in size). • Spill may reach a navigable waterway, storm sewer, or sanitary drain. • Spill may require special equipment or training to clean up. • If facility personnel address the spill, responding personnel have completed annual SPCC training. • If responding personnel are not comfortable cleaning up the spill, use a third-party contractor.	• Based on the assessment of the fuel delivery driver or trained oil handling employee(s), the spill poses an immediate hazard to human health or the environment. • There is danger of fire or explosion. • Spill involves injury to personnel. • The spill has reached a navigable waterway, storm sewer, or sanitary drain. • The spill cannot be contained.
Response by facility personnel possible **Notify Facility Emergency Coordinator (FEC) or Alternate FEC following response**	**Response requires coordination with Facility Emergency Coordinator (FEC) or Alternate FEC**	**Requires response by the Bracken Volunteer Fire Department – Call 911**

Notify the appropriate authority based on the classification of the spill. If unable to identify the appropriate level of spill classification, notify the Facility Emergency Coordinator immediately. See the flowchart in **Appendix G** for specific spill response steps. Post the provided **Spill Response Flow Chart** in close proximity to key oil storage areas. Details regarding the spill volumes, direction of flow, and potential spill receptors for individual tanks and containers at the facility are listed in **Table 1** on **Page 4**.

A number of spill scenarios are possible. The severity of the spill is dependent on a number of factors, such as, the spill scenario, the spill flow rate, or secondary containment. The spill flow rate could potentially range from a gradual spill (i.e., drip) to an instantaneous spill (i.e., complete failure) for its oil sources. This plan will rely on the Oil Spill Response Criteria (above) and the Spill Response Flow Chart (**Appendix G**) to determine how to most appropriately respond to each spill.

3.1 VERBAL OIL SPILL NOTIFICATION REQUIREMENTS

Depending on the nature and quantity of the oil spilled, several individuals and organizations must be contacted by the Facility Emergency Coordinator or designee in the event of a spill. Circumstances, instructions, and phone numbers for reporting a spill to federal, state and local agencies, and to other affected parties are provided below. **If in doubt about whether to report a spill or not, report it**.

Table 3. Oil Spill Notification Procedures

Agency/ Organization	Contact	Circumstances	When to Notify
State Agencies			
Texas Commission on Environmental Quality/State Emergency Response Commission	State of Texas Spill – Reporting Hotline: 1-800-832-8224 (24-hours) Central Texas Regional Office – 210-403-4010 (Daytime only) 12100 Park 35 Circle Austin, TX 78753	All petroleum and used oil spills onto land equal to or greater than 25 gallons in any 24-hour period. All spills that produces a sheen on water and/or threatens navigable waters.	**As soon as possible** but not later than 24 hours after discovery of the spill or discharge. Written follow-up within 30 days after initial notification.
Federal Agencies			
USEPA National Response Center (NRC)	1-800-424-8802 www.nrc.uscg.mil	Discharge reaches navigable waters.	**As Soon As Possible**(verbal)
EPA Region 6 Regional Office	USEPA Region 6 1-800-887-6063 1201 Elm Street, Suite 500 Dallas, TX 75270	Discharge of 1,000 gallons or more; **or** Second discharge of 42 gallons or more over a 12-month period.	**Within 60 days:** Written notification (see **Section 3.3**)
Local Agencies			
Bracken Volunteer Fire Department	911	Spill that poses emergency conditions, regardless of the volume discharged.	**Immediately** (verbal)

Table 3. Oil Spill Notification Procedures

Agency/ Organization	Contact	Circumstances	When to Notify
Comal County Emergency Management and Emergency Operations	830-221-1108 (Daytime hours)	Spill that poses emergency conditions, regardless of the volume discharged.	**As Soon As Possible** (verbal)

For local agencies, a spill posing emergency conditions or imminent danger requires "immediate" notification to those authorities without other actions.

For state and federal agency verbal notifications, a spill that has occurred and meets reporting thresholds stated above requires notification "As Soon As Possible". In the case of state and federal verbal notifications, the facility can respond to spills that don't pose imminent danger and collect all the information needed to complete the Spill Incident Report (**Appendix E**) prior to making these verbal notifications to agencies, but they should be made as soon as reasonably possible.

Under the SPCC rule, a reportable spill refers to any amount of oil that **reaches, or threatens to reach, a** navigable waterway. A waterway is generally defined as a storm sewer, storm water detention basin, ditch, creek, lake, river, groundwater, etc.

3.2 USEPA WRITTEN SPILL NOTIFICATION REQUIREMENTS

A written notification to the USEPA Regional Administrator is required for any single discharge of oil to a navigable waterway or adjoining shoreline waterway, for any discharge greater than 1,000 gallons, or for two discharges of 42 gallons or more of oil to navigable waters in any 12-month period. This report must be made within 60 days of the discharge and must include the following information:

1. Name of the facility.
2. Name of the individual submitting the information.
3. Location of the facility.
4. Maximum storage or handling capacity of the facility and normal daily throughput.
5. The corrective actions and/or countermeasures taken, including adequate description of equipment repairs and/or replacements.
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps.
7. A complete copy of the SPCC Plan with any amendments.
8. The cause(s) of such discharge(s), including a failure analysis of the system or subsystem in which the failure(s) occurred.
9. Additional preventative measures taken or contemplated to minimize the possibility of recurrence.

3.3 SPILL RESPONSE MATERIALS AND WASTE DISPOSAL

Spill Response Materials / Equipment

Table 4. Spill Response Materials and Equipment

Location	Response Materials
Main Plant Building	Spill kit drum with absorbent materials
Southeast Metal Building	Spill kit drum with absorbent materials
Adjacent to ASTs	Spill Kit drum with absorbent materials

Disposal of Used Sorbents and Contaminated Soil

- Record used sorbents and contaminated soil reclaimed after a spill in the Oil Spill Disposal Record (**Appendix F**).
- Dispose used sorbents and contaminated soil in a manner consistent with local, state, and federal regulations, as well as Meridian Brick policy.
- Contain absorbent materials separately from contaminated soil/granular clay (Oil-Dri) in drums or non-leaking containers.
- Work with your regulated waste vendor to determine if the spilled product may be considered a hazardous waste.

Notes: Oil absorbents that are not hazardous waste may be placed in the trash if there is no free-flowing oil remaining in the absorbents. A licensed waste disposal company can help with removal and treatment of hazardous wastes and absorbents with free-flowing oil.

4.0 SPILL PREVENTION

This section covers the Facility's prevention and control measures in place to help this facility limit its potential for spills.

4.1 POTENTIAL OIL SPILL SOURCES

For the oil sources at this facility, the maximum spill volumes, direction of flow, and potential spill receptors for individual tanks and containers are listed in **Table 1** and shown on **Figure 3**. An oil spill could occur due to any of the following situations:

During loading/unloading activities, such as:

- Overflow or spillage during tank or container filling

- Potential rate of flow is dependent on fill rate of mobile tanker truck (typically ranges between 60 gallons per minute [gpm] and 300 gpm)
- Total volume released is dependent on how quickly the filling technician or facility representative (if observing transfer process) is able to press the emergency shutoff button on the tanker truck and size/remaining product in the mobile tanker truck (typically ranges from zero to hundreds of gallons).
- Third party tank trucks that services the facility are typically 5,000 gallons.

- Spillage during tank or container emptying
  - Potential rate of flow is dependent on the empty rate of the truck or pump (typically ranges from 5 to 10 gpm for pumps and 60 to 300 gpm for mobile tanker trucks)
  - Total volume released dependent on how quickly the filling technician or facility representative (if observing transfer process) is able to turn off/unplug the pump or press the emergency shutoff button on the truck and size/remaining product in the mobile tank truck (typically ranges from zero to hundreds of gallons).

Due to equipment failure, such as:

- Tank rupture as a result of nature, human error, or vandalism
  - Potential release rate is instantaneous (entire container contents released immediately) and total volume released is equal to the volume of the container (see **Table 1**)
- Leaks due to corrosion or partial failure of tank or container seams, pipes, valves, or connections
  - Potential release rate is approximately 0 to 10 gpm and total volume released is equal to the volume of the container (see **Table 1**)
- Failure of oil-filled equipment

4.2 GENERAL SPILL PREVENTION MEASURES

Implement the following measures, if not already, to prevent or limit an oil spill at the facility:

- Verify that tanks and containers are constructed of material compatible with the oil being stored (**Section 4.8**).
- Provide a functioning liquid level sensing device for bulk storage containers, such as a visual gauge, an electronic high level alarm, or automatic pump cutoff (**Section 4.4.3**).
- Practice good housekeeping to ensure that oil storage areas are kept clear of debris.
- Promptly correct all visible spills (**Section 3.0**).
- Provide appropriate secondary containment (**Section 4.3**).

- Practice proper unloading/loading procedures during oil transfer activities (**Section 4.4/Appendix H)**.
- Conduct monthly inspections on all SPCC-applicable tanks and containers (**Section 4.5.1/Appendix C**).
- Conduct integrity testing, or a practice that is environmentally equivalent, on tanks and containers as required (**Section 4.5.2**).
- Store sufficient spill response materials near oil sources (**Section 3.3**).
- Train personnel at least annually in proper oil-handling procedures (**Section 4.6/Appendix D**).
- Provide adequate security measures on and around all oil sources (**Section 4.7**).
- Maintain inspection and maintenance records for 3 years (**Section 4.5.1/Section 7.0**).

4.3 SECONDARY CONTAINMENT

All oil source areas listed in **Table 1** at this facility are required to be designed with appropriate containment and/or diversionary structures. Common examples of secondary containment include double-wall tank construction, concrete containment berms, spill pallets for portable drums, nearby sorbent materials, oil/water separators, and self-contained concrete-floored rooms. Specific information regarding secondary containment measures provided for each tank and container is included in **Table 1**.

Oil storage containers at the facility have sufficient secondary containment. Bulk storage containers (tanks and drums) meet the requirements for sized containment in 40 CFR 112.8(c)(2). Portable oil storage containers meet the requirements in 40 CFR 112.8(c)(11).

4.4 OIL TRANSFER ACTIVITIES

4.4.1 Transfer Procedures

Oil transfer at the facility may include the filling and emptying of tanks by a tanker truck, the dispensing of oil from tanks into smaller containers or vehicles, or the transfer of new and used oil into tanks or containers. Specific oil transfer activities related to individual oil sources for this facility are included in **Table 1**. Fill port covers prevent water from entering tanks and are kept closed except when transfers are occurring. All petroleum product vendors and facility employees who deliver, load, unload, or pick up petroleum products must review and comply with the requirements set forth in **Appendix H**, the Notice to Petroleum Product Vendors. Provide a copy of the notice to the vendor prior to each fuel transfer or post at tanks. During oil transfer activities, follow these measures to prevent a spill:

- Temporarily cover or block nearby storm or sanitary sewer drains (as applicable).
- Know the location of the closest spill kit containing oil absorbent materials in case of a spill.
- Check to make sure the drivers understand the amount of product to be transferred and they are constantly monitoring for potential oil storage container overfills.

- Ensure drivers are monitoring the transfer of oil full-time while the product is being transferred.
- Use wheel chocks or other similar barriers to prevent premature movement of transfer vehicles.
- Inspect around and below oil transfer vehicles for leaks before and after loading or unloading.
- For transfers not involving filling and emptying of tanks by a tanker truck, use a funnel or pump when adding or removing smaller quantities of oil to tanks, containers, or filling oil-filled electrical equipment reservoirs.

Post, distribute, and/or discuss the Notice to Petroleum Product Vendors (**Appendix H**) prominently in key oil transfer areas, to ensure these practices are followed by vendors and Meridian employees.

4.4.2 General Secondary Containment in Transfer Areas

Secondary containment for the diesel AST loading and unloading areas is provided through an underground fuel containment system located approximately 30 feet northwest of the AST. If a spill occurs within the fuel transfer area of the AST, the spill would likely flow over the paved surface to a trench drain. The trench drain discharges to an underground containment tank with a capacity of 500 gallons. The underground tank would contain the spill until the fuel is recovered.

Since other fuel/oil transfers at the facility are conducted on impervious or gravel surfaces and have nearby spill kits readily available for use if needed, they meet general secondary containment requirements in 40 CFR 112.7(c). Spill kit locations are shown on **Figure 3**. This practice is in place to contain a potential spill to the oil transfer area.

4.4.3 Overfill Protection

The Facility's aboveground storage tanks (ASTs) have sufficient overfill protection in the form of either high liquid level alarms (40 CFR 112.8(c)(8)(i)) or direct vision level gauges (40 CFR 112.8(c)(8)(iv)). To use the alternative of "direct vision gauges," a person must be present to monitor gauges and the overall filling of bulk storage containers (ASTs)

The facility is following the environmentally equivalent procedure below in lieu of the 40 CFR 112.8(c)(8) for drum storage and the indicated tanks without visual gauges.

1. Verify container has sufficient free capacity for the transfer
2. Visually monitor the product level during transfer.

For overfill protection associated with individual oil sources, see **Table 1**.

4.5 INSPECTIONS AND INTEGRITY TESTING

4.5.1 Periodic Visual Inspections

The purpose of visual inspections is to determine if an oil spill has occurred, assess the general condition of tanks, containers, and piping, and determine the suitability for continued oil storage until the next inspection. The inspection program for the facility includes informal observations for leakage from equipment as it is used as well as monthly scheduled inspections. Checklists used to document the inspections are included as **Appendix C** must be kept with the SPCC Plan for a minimum of 3 years. The visual inspections do not require a Certified Inspector.

Table 1 lists the required inspection frequency for individual tanks and containers. Inspection criteria and schedules outlined in this plan are based on the Steel Tank Institute (STI) *Standard for the Inspection of Aboveground Storage Tanks,* SP-001-18 (2018, 6th Edition). This standard is applicable to shop-fabricated tanks (less than 30,000 gallons in capacity) and portable containers.

The STI recommends monthly and annual inspections. However, due to the container size and type, the annual requirements were combined into the monthly inspection sheets. Therefore, conduct monthly inspections by checking:

- Storage areas for signs of debris that may block access
- Storage areas for unlabeled or outdated containers
- Tanks, containers, and associated piping for evidence of leakage or spillage
- Tanks and containers for water or oil in the tank, interstice, or secondary containment
- Outdoor secondary containment structures that require drainage (**Appendix L)**
- Secondary containment structures for evidence of damage
- Tank foundation and support structures for signs of settlement, corrosion, or damage
- Tank or container exterior coatings for needed cleaning or maintenance
- Tank normal and emergency vents for needed cleaning or maintenance
- Tank or container liquid level and overfill prevention sensing devices
- Spill response materials for replacement or replenishment of spill response materials

Additional inspection items may be warranted if the facility incurs damaging severe weather events (e.g., lightning strikes, wind damage, flooding). The inspection frequency for the oil/fuel storage containers at this facility is summarized in the table below.

Table 5. Inspection Guidance by Container Type

Tank or Container Type	Guidance	Visual Inspection Frequency
Aboveground storage tanks	STI SP-001-18	Monthly [1]
Portable drums/containers	STI SP-001-18	Monthly
Transformers *(owned by Meridian Brick)*	Manufacturer recommendations	Follow manufacturer recommendations
Hydraulic Pumps and Equipment (lifts, trash compactors, elevators, etc.)	Manufacturer recommendations	Follow manufacturer recommendations

1. STI recommends monthly and annual inspections. This SPCC Plan lists the STI SP-001-18 annual inspection requirements on a monthly basis, therefore inspections listed in this plan are listed only as monthly.

The facility personnel performing these inspections are knowledgeable of the facility operations, characteristics of the oil stored, the type of container, and its associated components. The scope of inspections and procedures are covered in the training provided to employees involved in handling oil at the facility. The routine inspections focus specifically on detecting changes in conditions or evidence of oil leakage from the container, piping system, or appurtenances.

If non-conforming items important to the tank or containment integrity are identified, an evaluation by an engineer experienced in AST design, a certified inspector, or a tank manufacturer is required to determine the appropriate corrective action. As an alternative, the facility owner may replace the tank/container with a new tank/container.

Maintain copies of tank permits, licenses, records of inspections, and integrity tests (if conducted).

4.5.2 Integrity Testing

The purpose of integrity testing is to measure the tank or container's structural imperviousness and its soundness in containing oil, ensuring its suitability for continued use under current and anticipated operating conditions. Integrity testing may also help a facility determine whether corrosion has reached a point where repairs or replacement of the container is needed, and thus avoid unplanned interruptions in facility operations.

Compliance recommendations for the SPCC rule's integrity testing requirements are based on the (STI) *Standard for the Inspection of Aboveground Storage Tanks,* SP-001-18 (2018, 6th Edition). The following table summarizes general integrity testing requirements.

Table 6. Integrity Testing Guidance by Container Type and Size

Tank Type	Tank Volume (gallons)	Secondary Containment	Guidance	Integrity Testing Frequency
Shop-built aboveground storage tanks	0 – 1,100	Spill control[1] with **or** without a continuous release detection method[2]	STI SP-001-18	Not required
	5,001 – 30,000	Spill control[1] with continuous release detection method[2]	STI SP-001-18	E(20)[3]
Portable Containers	Drums/Totes	Spill control[1] with **or** without continuous release detection method[2]	STI SP-001-18	Not required

[1] Spill control is a means of preventing a release of liquid to the environment (e.g., secondary containment berm, dual-walled AST, or other secondary containment system).

[2] Continuous release detection method (CRDM) refers to a means of detecting a release of liquid where releases are visually detectable by facility operators (e.g., dual-walled AST with interstitial monitoring port, elevated AST, AST on a concrete floor).

[3] E(10) and I(20) = Formal external inspections every 10 years and formal internal inspections every 20 years by a certified inspector

E(5) and L(10) = Formal external inspections every 5 years by a certified inspector, and leak testing every 10 years by owner or owner's designee

E(5) and I(10) = Formal external inspections every 5 years and formal internal inspections every 10 years by a certified inspector

E&L(10) = Formal external inspections every 10 years by a certified inspector, and leak testing every 10 years by owner or owner's designee

E(20) = Formal external inspections every 20 years by a certified inspector

Integrity testing requirements for each SPCC-applicable container are included in Table 1.

4.6 PERSONNEL TRAINING

All oil-handling personnel must receive at least annual training to properly respond to spills in their work areas. The Facility Emergency Coordinator determines who is trained, considered an oil-handling employee at the facility, and the content and training method (e.g., hands-on, classroom, computer-based of the training provided). A training documentation form is provided in **Appendix D**. Update the form each time the on-site staff receive training. Training needs to cover the following information:

- The contents of the facility SPCC Plan, including the specific locations of oil tanks and containers;
- The frequency and procedures of inspections and record keeping;
- The operation and maintenance of equipment to prevent spills;
- Spill response procedures;
- Applicable oil pollution prevention laws, rules, and regulations;
- General facility operations; and
- Discharge prevention briefings highlighting and describing discharges or failures, malfunctioning components, and any recently developed precautionary measures.

4.7 SECURITY

In order to ensure the safety of the facility personnel and to minimize the potential for releases of oil, various security measures are in place. Security measures at the facility includes perimeter fencing with locking gates and adequate exterior lighting, Facility buildings are kept locked during non-operating hours.

Specific security information related to individual tanks and containers is listed in **Table 1**.

4.8 TANK CONSTRUCTION MATERIAL

All tanks and containers are constructed with material that is compatible with the contents stored in them.

4.9 DOCUMENTING STORM WATER RELEASES FROM SECONDARY CONTAINMENT

Document storm water releases from the outdoor secondary containment areas associated with hydraulic oil tanks and drum storage areas on the form provided in **Appendix L**.

5.0 CONFORMANCE WITH APPLICABLE STATE REQUIREMENTS

This SPCC Plan was prepared and is implemented consistent with the current version of 40 CFR 112. The State of Texas regulates AST storage through the Texas Commission on Environmental Quality (TCEQ). The facility has both exempt and non-exempt tanks and applicability is summarized in TCEQ Regulatory Guidance RG-475n (https://www.tceq.texas.gov/downloads/assistance/publications/rg-475n-aboveground-petroleum-storage-tanks).

Under 30 TAC 334, TCEQ regulates petroleum ASTs with a storage capacity greater than 1,100 gallons. The 12,000 gallon diesel AST is required to be registered through the TCEQ.

The State of Texas has a requirement for spill reporting. A spill is required to be reported within 24 hours if the following conditions exists for an oil/petroleum spill:

1. Any spill or overfill that results in a release to the environment that exceeds 25 gallons;
2. Any spill or overfill that causes a sheen on nearby surface water regardless of size;
3. Any spill or overfill that is less than 25 gallons but cannot be cleaned up within 24 hours.

Immediate reporting may occur after calling 911 (if required) and the incident is stabilized (as appropriate determined by facility personnel). Report spills to the State of Texas Spill Hotline (1-800-832-8224), and include information on the spill containment procedures undertaken, and a proposed procedure for cleanup and disposal.

Spills that are contained to a secondary containment and can be cleaned up with Facility spill response materials, do not require reporting to TCEQ.

6.0 CERTIFICATION REQUIREMENTS

The facility has approximately 13,500 gallons of aboveground oil storage capacity in containers 55 gallons or greater.

Since the facility has over 10,000 gallons of aboveground oil storage capacity (see Table 1), a Professional Engineer must certify this plan and future technical amendments.

7.0 RECORDS

Maintain records with the SPCC Plan for a minimum of 3 years. Records may be kept in electronic format. Records to maintain include:

- Inspection checklists (**Appendix C**),
- Secondary containment drainage log (**Appendix L**),
- Training record (**Appendix D**),
- Annual SPCC Plan review (**Appendix I**),
- Spill incident reports (if needed) (**Appendix E**),
- Oil spill disposal record (if needed) (**Appendix F**)
- Amendment log (**Appendix J**), and
- Amendment certification (if needed) (**Appendix K**).

8.0 MODIFICATIONS TO COMPLY WITH THE SPCC PLAN

This plan was written assuming the following modifications were completed. If not already, the following modifications are required in order for the Facility to be in compliance with the current SPCC Plan.

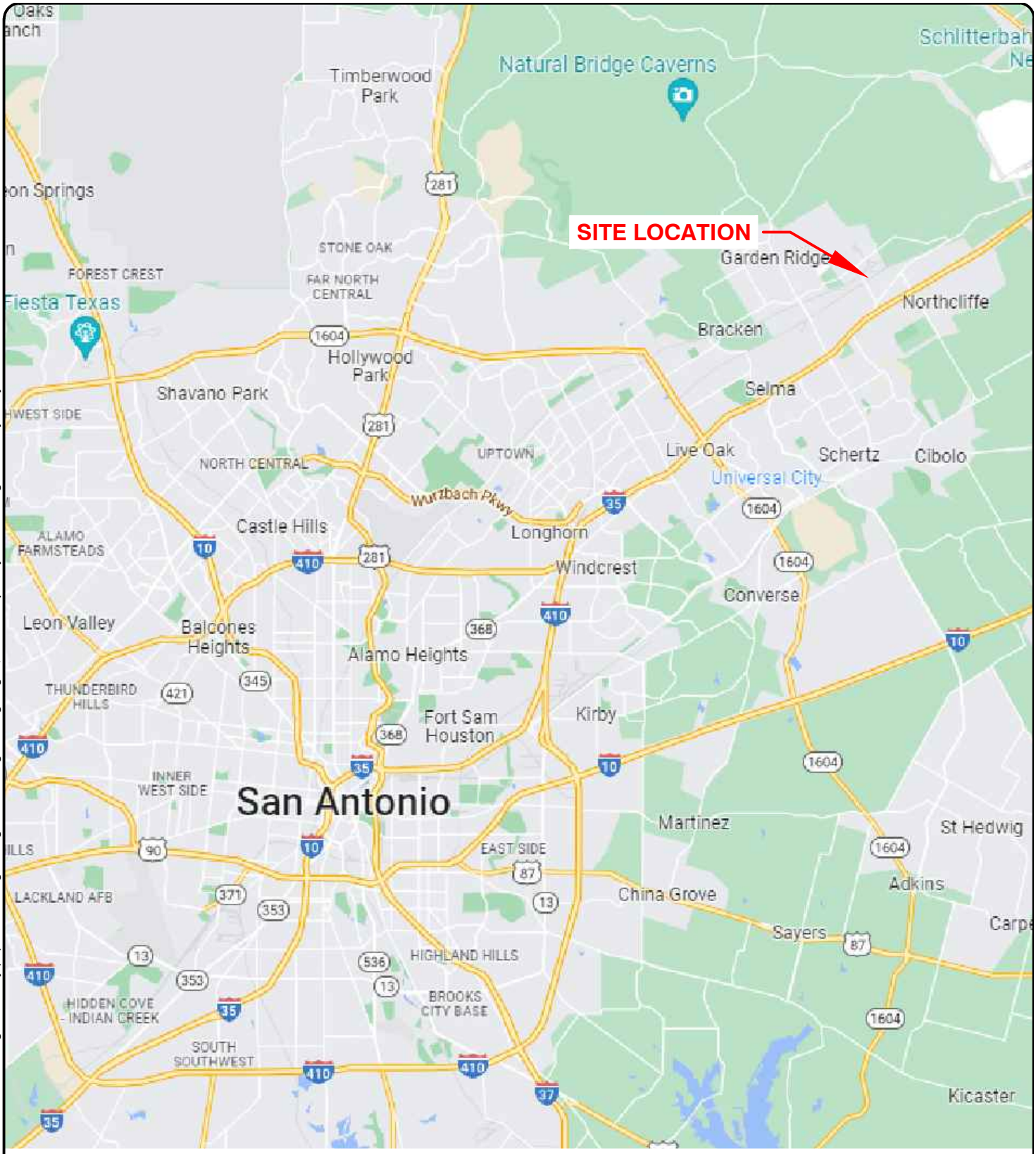
- Overfill protection in the form of visual site gauges and/or audible alarms should be installed on the hydraulic oil ASTs.
    - Date completed:_____
    - Completed/Verified by:_____
- Spill response materials should be provided in the vicinity of oil transfer areas including the ASTs, drums, and the fueling station.
    - Date completed:_____
    - Completed/Verified by:_____
- Provide locks on hydraulic oil AST fill ports.
    - Date completed:_____
    - Completed/Verified by:_____
- Leaking Facility oil containing equipment (compressors, motors, dryers, etc.) should be repaired and spills around the equipment should be cleaned up.
    - Date completed:_____
    - Completed/Verified by:_____
- Repair drum storage containment curbing or provide spill pallets for drums.
    - Date completed:_____
    - Completed/Verified by:_____

Completed modifications should also be noted on **Table 1**.

Appendix A

Figures

- Figure 1: Site Location Map
- Figure 2: USGS Topographic Map
- Figure 3: Facility Layout
- Figure 4: Diesel AST Diagram



Map Source: Google Street Maps

NOT TO SCALE

FIGURE 1 - SITE LOCATION MAP

MERIDIAN BRICK LLC - OGDEN
21445 FM 2252
SCHERTZ, TEXAS 78154

SCS ENGINEERS

8575 W. 110th St, Ste. 100
Overland Park, Kansas 66210
PH. (913) 681-0030 FAX. (913) 681-0012

CHK. BY: TMJ	DWN. BY: BDR	DSN. BY: BDR	PROJ. NO. 27221255.00
PROJ. MGR: TMJ	DATE: 8/17/22	CADD FILE: OGDEN SPCC FIGURES.DWG	DRAWING NO. 1

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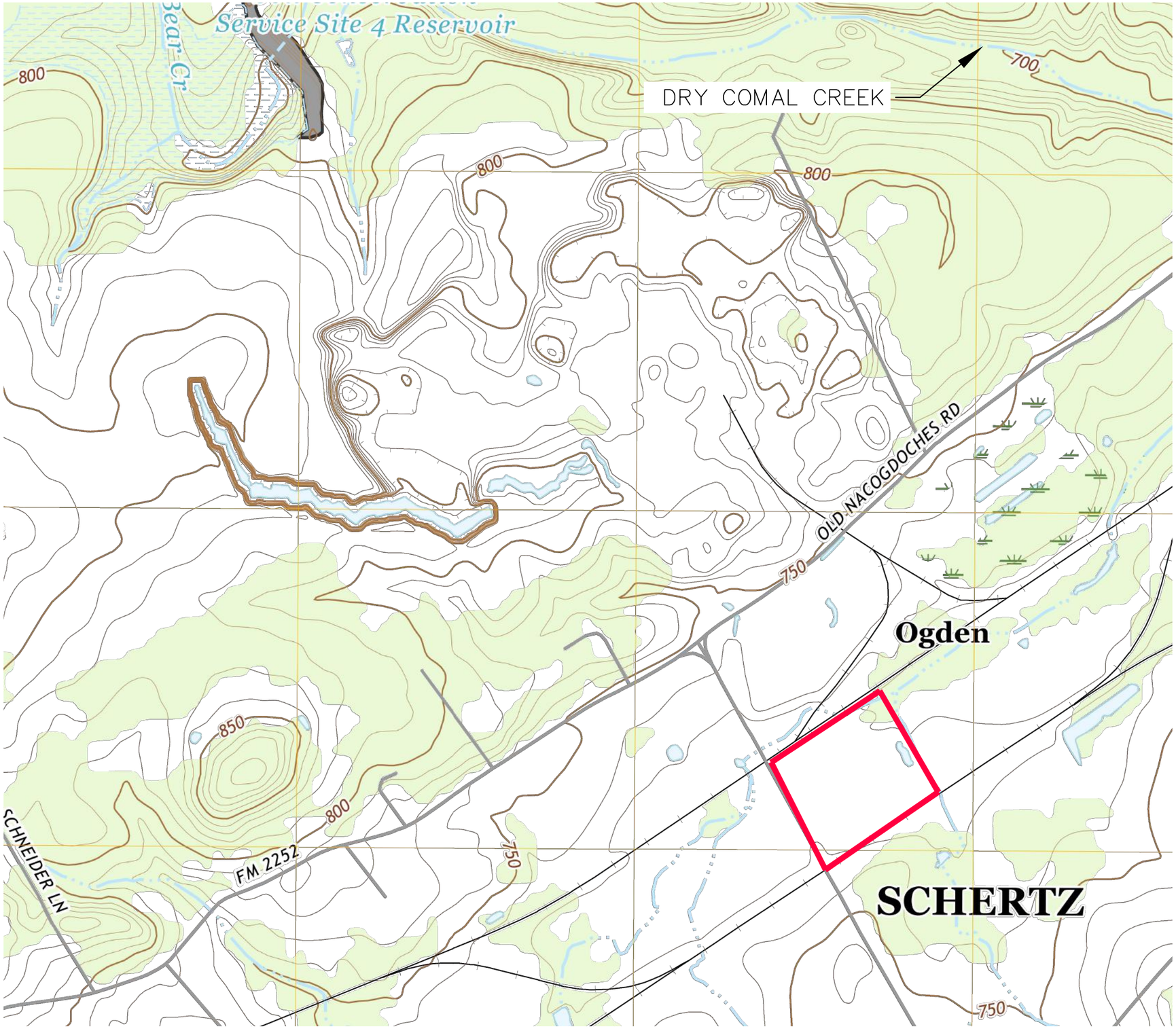

LEGEND

APPROXIMATE WATER FLOW DIRECTION

APPROXIMATE FACILITY BOUNDARY

NOTE:
USGS US TOPOGRAPHY 7.5 MINUTE
MAP FOR BAT CAVE, TX 2019

RECEIVING BODY OF WATER

SEGMENT 1811A UNNAMED CREEK TO DRY COMAL CREEK TO COMAL RIVER
(DRY COMAL CREEK IS IMPAIRED FOR BACTERIA)

1000 0 1000 2000

SCALE FEET

FIGURE 2 - USGS TOPOGRAPHIC MAP

MERIDIAN BRICK LLC - OGDEN
21445 FM 2252
SCHERTZ, TEXAS 78154

SCS ENGINEERS

8575 W. 110th St. Ste100
Overland Park, Kansas 66210
PH. (913) 681-0030 FAX. (913) 681-0012

CHK. BY: TMJ	DWN. BY: BDR	DSN. BY: BDR	PROJ. NO. 27221255.00
PROJ. MGR: TMJ	DATE: 8/17/22	CADD FILE: OGDEN SPCC FIGURES.DWG	

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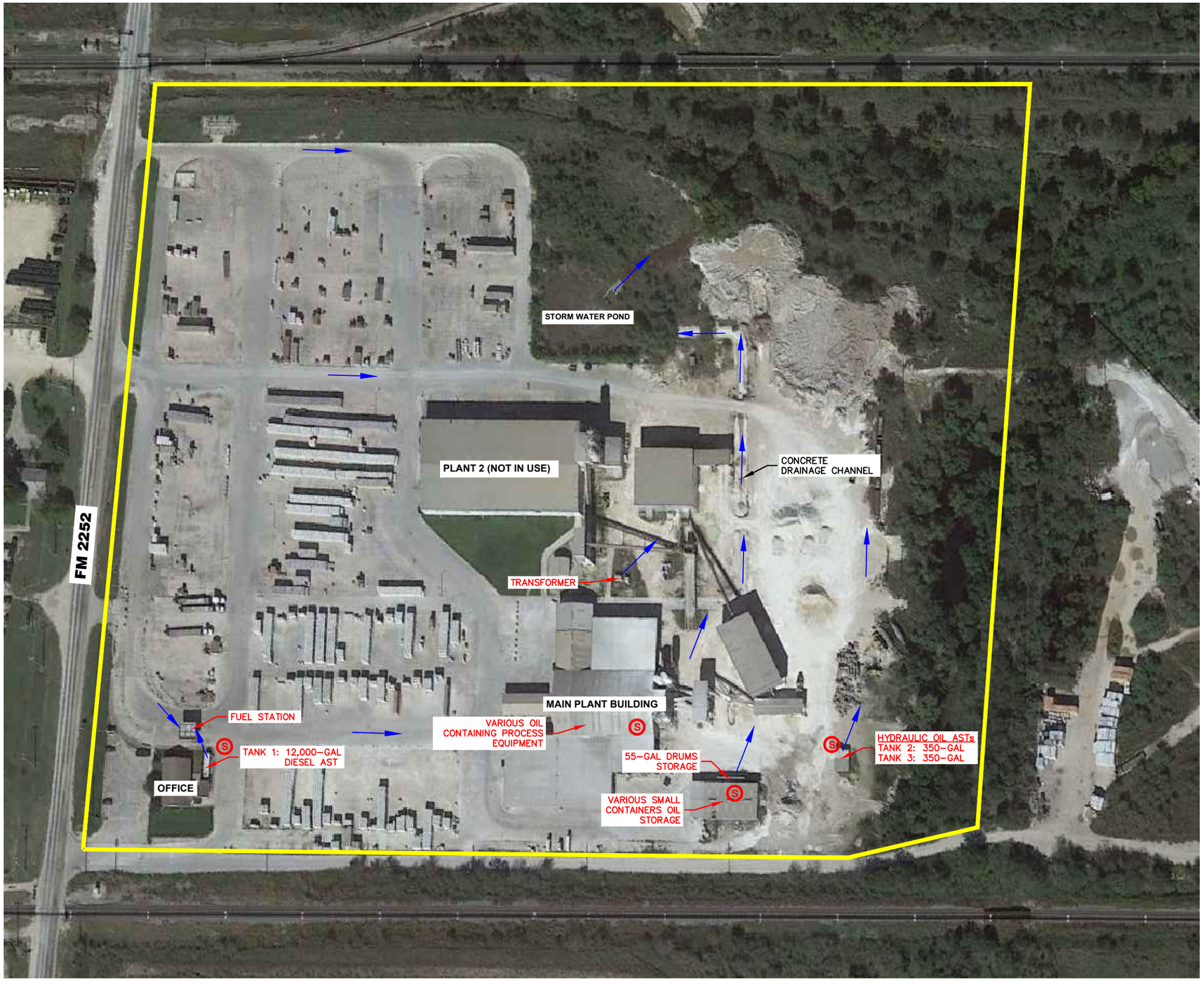

GOOGLE EARTH IMAGE DATED OCTOBER 2021

LEGEND

APPROXIMATE WATER FLOW DIRECTION

APPROXIMATE FACILITY BOUNDARY

SPILL KIT LOCATION

RECEIVING BODY OF WATER

SEGMENT 1811A UNNAMED CREEK TO DRY COMAL CREEK TO COMAL RIVER
(DRY COMAL CREEK IS IMPAIRED FOR BACTERIA)

150 0 150 300

SCALE FEET

FIGURE 3 - FACILITY LAYOUT

MERIDIAN BRICK LLC - OGDEN
21445 FM 2252
SCHERTZ, TEXAS 78154

SCS ENGINEERS
8575 W. 110th St. Ste100
Overland Park, Kansas 66210
PH. (913) 681-0030 FAX. (913) 681-0012

CHK. BY: TMJ	DWN. BY: BDR	DSN. BY: BDR	PROJ. NO. 27221255.00
PROJ. MGR: TMJ	DATE: 8/17/22	CADD FILE: OGDEN SPCC FIGURES.DWG	

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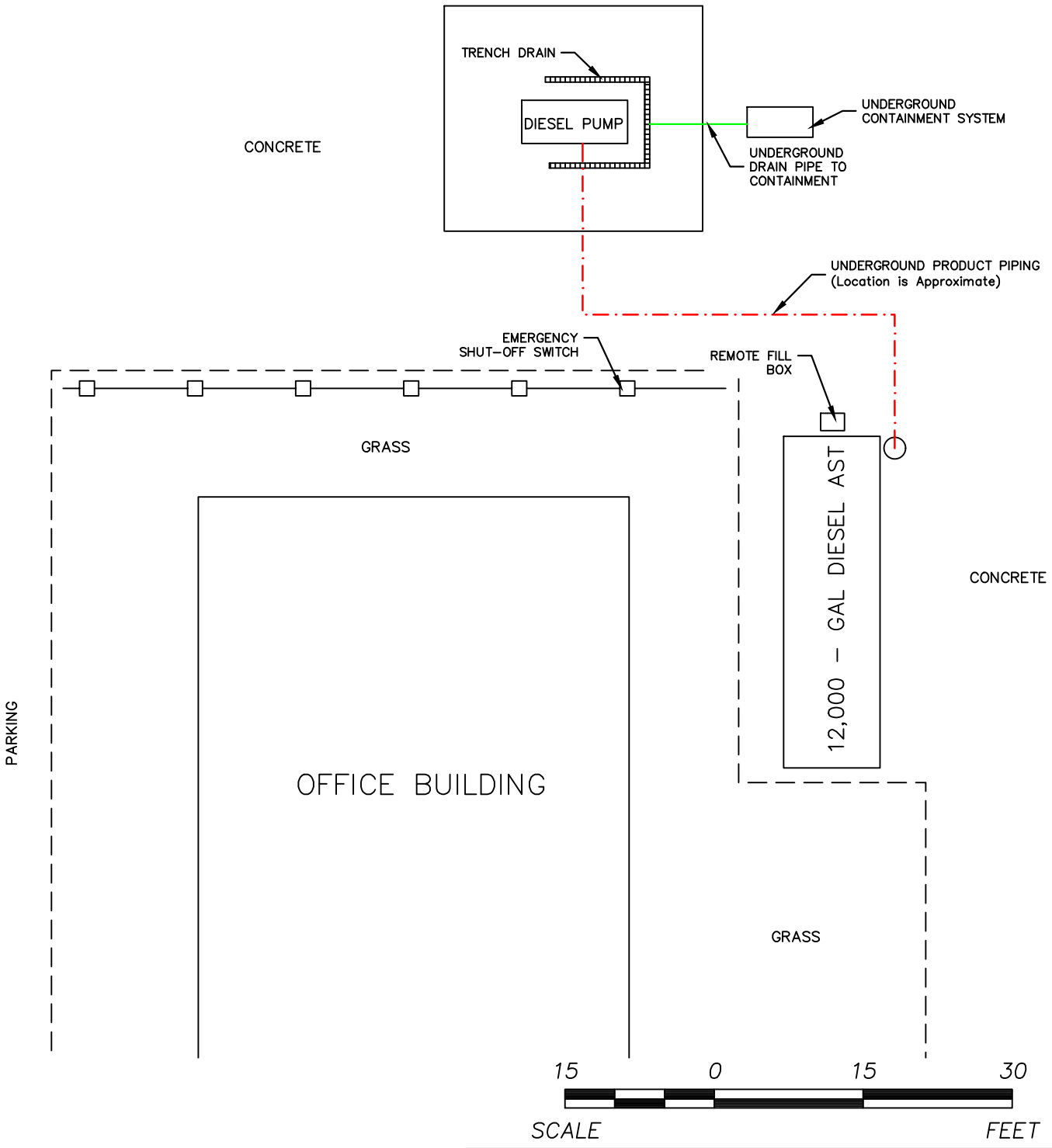

FIGURE 4 - DIESEL AST DIAGRAM

MERIDIAN BRICK LLC - OGDEN
21445 FM 2252
SCHERTZ, TEXAS 78154

SCS ENGINEERS
8575 W. 110th St, Ste. 100
Overland Park, Kansas 66210
PH. (913) 681-0030 FAX. (913) 681-0012

CHK. BY: TMJ	DWN. BY: BDR	DSN. BY: BDR	PROJ. NO. 27221255.00
PROJ. MGR: TMJ	DATE: 8/17/22	CADD FILE: OGDEN SPCC FIGURES.DWG	DRAWING NO. 4

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Appendix B

Cross Reference with SPCC Rule

Cross-Reference with the SPCC Rule
Meridian Brick LLC – Ogden Texas

40 CFR Part 112	Description	SPCC Plan Location
Subpart A: Applicability, Definitions, and General Requirements for All Facilities and All Types of Oils		
§ 112.1	General applicability	Section 1.1
§ 112.2	Definitions	See 40 CFR 112
§ 112.3(d)	Professional Engineer Review & Certification	Section 6.0, Page iv
§ 112.3(e)	Plan location and availability	Section 1.2
§ 112.4	Regional Administrator Submittal	Section 3.2
§ 112.5	Amendment of SPCC Plan by owners or operators	Section 6.0, and Appendix J
§ 112.6	Qualified Facilities Plan requirements	Section 6.0
§ 112.6(a)(2)	Technical Amendments	Appendix J
§ 112.7	General requirements for SPCC Plans	
§ 112.7(a)(1)	Conformance with applicable parts of § 112.7	Sections 1.0 and 5.0
§ 112.7(a)(2)	Compliance with applicable parts of § 112.7 and equivalent environmental protection	See the other cross-references in this table
§ 112.7(a)(3)	Physical layout and facility diagram	Figures 2 and 3
(a)(3)(i)	Oil storage type and capacity	Table 1
(a)(3)(ii)	Discharge prevention measures	Section 4.0 and Table 1
(a)(3)(iii)	Discharge or drainage controls	Section 4.2 and Table 1
(a)(3)(iv)	Countermeasures for discharge discovery, response, and cleanup	Section 3.0
(a)(3)(v)	Recovered material disposal	Section 3.3
(a)(3)(vi)	Contact list	Sections 1.2 and 3.0, Appendix G
§ 112.7(a)(4)	Response plan or spill reporting procedures	Sections 3.0, Appendix H, E
§ 112.7(a)(5)	Discharge procedures to use in emergency	Section 3.0 and Appendix G
§ 112.7(b)	Spill direction, rate of flow and total quantity of oil during failures	Table 1, Figure 3, and Section 3.0
§ 112.7(c)	General Secondary Containment	Section 4.4.2
§ 112.7(d)(1)	Secondary containment impracticability determination	Not applicable
§ 112.7(d)(2)	Written commitment of manpower, equipment, and materials	Page iii
§ 112.7(e)	Inspections, tests, and records	Sections 4.5 and 7.0, and Appendix E and F
§ 112.7(f)(1)	Train the facility's oil-handling personnel	Section 4.6 and Appendix D
§ 112.7(f)(2)	Designated accountable person for discharge prevention	Section 1.2 and Appendix G
§ 112.7(f)(3)	Conduct annual discharge prevention briefings	Section 4.6 and Appendix D
§ 112.7(g)	Security	Section 4.7 and Table 1

Cross-Reference with the SPCC Rule
Meridian Brick LLC – Ogden Texas

40 CFR Part 112	Description	SPCC Plan Location
§ 112.7(h)	Facility tank car and tank truck loading/ unloading rack	Not applicable
§ 112.7(i)	Field Constructed Tanks	Not applicable
§ 112.7(j)	State-level requirements	Section 5.0 and Appendix B
§ 112.7(k)	Oil-filled operational equipment	Section 1.2 and Table 1
Subpart B: Requirements for Petroleum Oils and Non-petroleum Oils, Except Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and Vegetable Oils (Including Oils from Seeds, Nuts, Fruits, and Kernels)		
§ 112.8	SPCC Plan Requirements for onshore facilities (excluding production facilities).	
§ 112.8(a)	Compliance with § 112.7	See above
§ 112.8(b)(1)	Restrain drainage from diked storage areas	Appendix L
§ 112.8(b)(2)	Valve use from diked storage areas	Appendix L
§ 112.8(b)(3)	Facility drainage systems from undiked areas	Sections 1.2 and 4.3 and Table 1
§ 112.8(b)(4)	Facility drainage diversion systems	Not applicable
§ 112.8(b)(5)	Facility drainage treatment systems	Not applicable
§ 112.8(c)(1)	Tank Material Compatibility	Section 4.8 and Table 1
§ 112.8(c)(2)	Secondary containment – bulk storage containers	Section 4.3 and Table 1
§ 112.8(c)(3)	Storm water drainage from diked areas	Appendix L
§ 112.8(c)(4)	Buried metal tank corrosion prevention	Not applicable
§ 112.8(c)(5)	Partially buried or bunkered metal tanks	Not applicable
§ 112.8(c)(6)	Integrity Testing	Section 4.5.2
§ 112.8(c)(7)	Internal heating coils	Not applicable
§ 112.8(c)(8) (i)-(v)	Overfill Protection (Liquid-level sensing devices)	Section 4.4.3 and Table 1
§ 112.8(c)(9)	Observation of effluent treatment facilities	Not applicable
§ 112.8(c)(10)	Promptly correct visible discharges of oil	Section 3.0, and Appendix E, F, G
§ 112.8(c)(11)	Secondary containment for mobile or portable containers	Section 4.3, Table 1
§ 112.8(d)(1)	Buried piping corrosion protection	Not applicable
§ 112.8(d)(2)	Cap or blank-flange the terminal connection on transfers	Not applicable
§ 112.8(d)(3)	Design pipe supports to minimize corrosion	Not applicable
§ 112.8(d)(4)	Routine inspection of all aboveground valves, piping, and appurtenances	Section 4.5.1, Appendix C
§ 112.8(d)(5)	Vehicular traffic near tank systems	Section 4.4.1, Table 1, and Appendix H
§ 112.9	SPCC Plan requirements for onshore oil production facilities (excluding drilling and workover facilities)	Not applicable

Cross-Reference with the SPCC Rule
Meridian Brick LLC – Ogden Texas

40 CFR Part 112	Description	SPCC Plan Location
§ 112.10	SPCC Plan requirements for onshore oil drilling and workover facilities	Not applicable
§ 112.11	SPCC Plan requirements for offshore oil drilling, production, or workover facilities	Not applicable
Subpart C: Requirements for Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and Vegetable Oils, Including Oils from Seeds, Nuts, Fruits, and Kernels)		
§ 112.12	SPCC Plan requirements	Not applicable
Subpart D: Response Requirements		
§ 112.20	Facility response plan	Not applicable
§ 112.21	Facility response training and drills/exercises	Not applicable

TAC *(select sections only)*	**Description**	**SPCC Plan Location**
Texas Commission on Environmental Quality		
30 TAC 334 – Subpart F	Aboveground Storage Tank Rules	Section 5.0

Appendix C

Monthly Inspection Form

Report Month and Year: _____

MONTHLY SPCC SITE INSPECTION REPORT

Area Inspected	Condition			Comments
	Yes Satisfactory	Not Satisfactory	Corrective Action Required	
Hoses and piping in good condition, no signs of concern*				
Tank surface and seams in good condition, no signs of concern*				
No signs of concern on or near Foundations*				
Tank level gages in good condition and working properly				
Valves (operable, closed and locked)				
Cap (top) of tank and vents (no obstructions and operable)				
Hatches (open) and check for no signs of leakage				
Piping and tank protected from vehicles (signs, barriers)				
Hose connections capped and locked				
Liquid level sensing device (operational, readable, tank and interstitial, annual testing)				
Secondary Containment in good condition, no signs of concern*				
No signs of concern in or around Secondary Containment*				
Secondary containment valve/drain locked				
Surrounding area free of debris and unauthorized material storage				
No fuel leaks (signs include stains, drips, dead vegetation)				
No vegetation or material to spread fire				
No evidence of smoking				
Response procedures posted				
No smoking signs posted				
Fire extinguishers inspected / accessible				
Warning signs posted				
Pump controls and/or power locked				
Lighting is operative				
Boldly marked emergency cutoffs - location				
Spill response equipment (present, stocked, and available)				
SPCC Plan Documentation and Records up to date				
Prior corrective actions were completed *(if applicable)*				
Other / Comments:				

Certification: I have performed the above inspection to the best of my ability and noted the actions that need to be taken.	
Signed:	**Position**:
Date:	**Time**:

*Signs of concern may include corrosion, rusting, cracks, settling, debris, erosion, paint chipping, standing water/liquid, etc.

Tank 1	Tank 2	Tank 3	Portable Containers	Transformer	Oil-Filled Equipment	Other
Diesel 12,000-gal. AST	Hydraulic Oil - 350-gal. AST	Hydraulic Oil 350-gal. AST	55-gallon drums, small containers inside buildings	640-gal. mineal oil storage	Various hydraulic plant equipment	

Appendix D

SPCC Training Documentation Form

ANNUAL EMPLOYEE TRAINING
(SPCC)

Coordinator: _____ Date:_____

Title: _____

Training Topics	Information Covered
Components and Goals of SPCC Plan	
Facility Areas, Pollutants, BMPs, Material Inventory, and Drainage Patterns	
Potential Release Sources	
Discharge Prevention	
Material Handling and Transfer	
Discharge Response Procedures	
Response Equipment	
Contacts and Responsibilities	
Inspection and Documentation Forms	
Schedule for Training and Inspections	
Recordkeeping	

Attendees

Appendix E

Incident Report Form

INCIDENT REPORT FORM

Meridian Brick LLC - Ogden
21455 FM 2252, Schertz, Texas 78154

1. Date of Report: _____
2. Name of Person Reporting Incident(s): _____
3. Time Problem Discovered: _____ Date: _____
4. Time Problem Stopped: _____ Date: _____
5. One spill greater than 1,000 gallons? ☐ YES * ☐ NO
6. Two spills each greater than 42 gallons in 12 months? ☐ YES * ☐ NO

*If yes, submit EPA Region 6, Regional Administrator Report within 60 days [40 CFR 112.4]

7. Name of Facility: Meridian Brick LLC - Ogden
8. Location of Facility: 21455 FM 2252, Schertz, Texas 78154
9. Maximum Storage Capacity of Facility: 14,000
10. Normal Daily Throughput of Facility: Varies
11. Description of Location and Type of Accident (Examples: Fire, Explosion, Spill, etc.):

_____

_____

12. Extend of Injuries (If Any): _____
13. What damage to people or the environment is likely? _____

_____

14. Nearest Body of Water: Unnamed Tributary to West Dry Creek Distance from Site: _____

    Is Water Impacted? ☐ YES ☐ NO
15. Materials Spilled: _____ Approximate Amount: _____
16. Estimated amount of material recovered: _____
17. What was done with recovered material? _____
18. Description of corrective action and countermeasures taken, including equipment repairs and replacements: _____

_____

_____

19. Cause of the incident or discharge and failure analysis: _____

_____

_____

20. Additional preventive measures taken or contemplated to minimize possibility of recurrence:

_____

_____

21. Medical Precautions: _____

22. Signature _____

    Position _____ Date _____

23. Submitted to Agency(s)? ☐ YES ☐ NO Agency(s) Name: _____

Appendix F

Oil Spill Disposal Record

Oil Spill Disposal Record

Meridian Brick LLC - Ogden
21455 FM 2252, Schertz, Texas 78154

Date	Volume of Oil Recovered	Recovered Oil Disposal Method*	Signature

*Indicate whether oil was recycled, returned to stock, or shipped off site for disposal. If shipped off site for disposal, indicate to what site the recovered oil was shipped.

Appendix G

Spill Response Flow Chart

Attachment G
Spill Response Flow Chart
Meridian Brick LLC - Ogden

Spill Response Criteria		
Incidental Spills	**Non-Incidental Spills**	**Imminent Danger Spills**
• The spill is small, less than 1 gallon. • The spill can be easily contained. • The spill is unlikely to reach a navigable waterway, storm sewer, or sanitary drain. • Cleanup procedures do not pose a health or safety hazard. • Proper response equipment is available for a safe cleanup. • Responding personnel have completed annual spill training. • Responding personnel are comfortable with cleaning up the spill.	• The spill is large enough to spread beyond the immediate area (generally 1 to 20 gallons in size). • Spill may reach a navigable waterway, storm sewer, or sanitary drain. • Spill may require special equipment or training to clean up. • If facility personnel address the spill, responding personnel have completed annual SPCC training. • If responding personnel are not comfortable cleaning up the spill, use a third-party contractor.	• Based on the assessment of the fuel delivery driver or trained oil handling employee(s), the spill poses an immediate hazard to human health or the environment. • There is danger of fire or explosion (e.g., a spill of greater than 1 gallon of gasoline). • Spill involves injury to personnel. • The spill has reached a navigable waterway, storm sewer, or sanitary drain. • The spill cannot be contained.
Response by facility personnel possible	**Response requires coordination with FEC or Alternate FEC**	**Requires response by the Bracken Volunteer Fire Department – Call 911**

FEC = Facility Emergency Coordinator

Contacts

Facility Emergency Coordinator (FEC): Robert Asencio, Plant Manager
Work: 830-310-3627/ Cell: 210-485-8125

Alternate FEC: David McKeown, Director, Environmental Compliance
Phone #: 803-691-3121

Other Phone Numbers for Emergency Coordinator Use Only:

State of Texas Spill Reporting Hotline*	800-832-8224
EPA Region 6 Office	800-887-6063
National Response Center	800-424-8802
City of Schertz Fire Department	911
(non-emergency)	210-619-1274

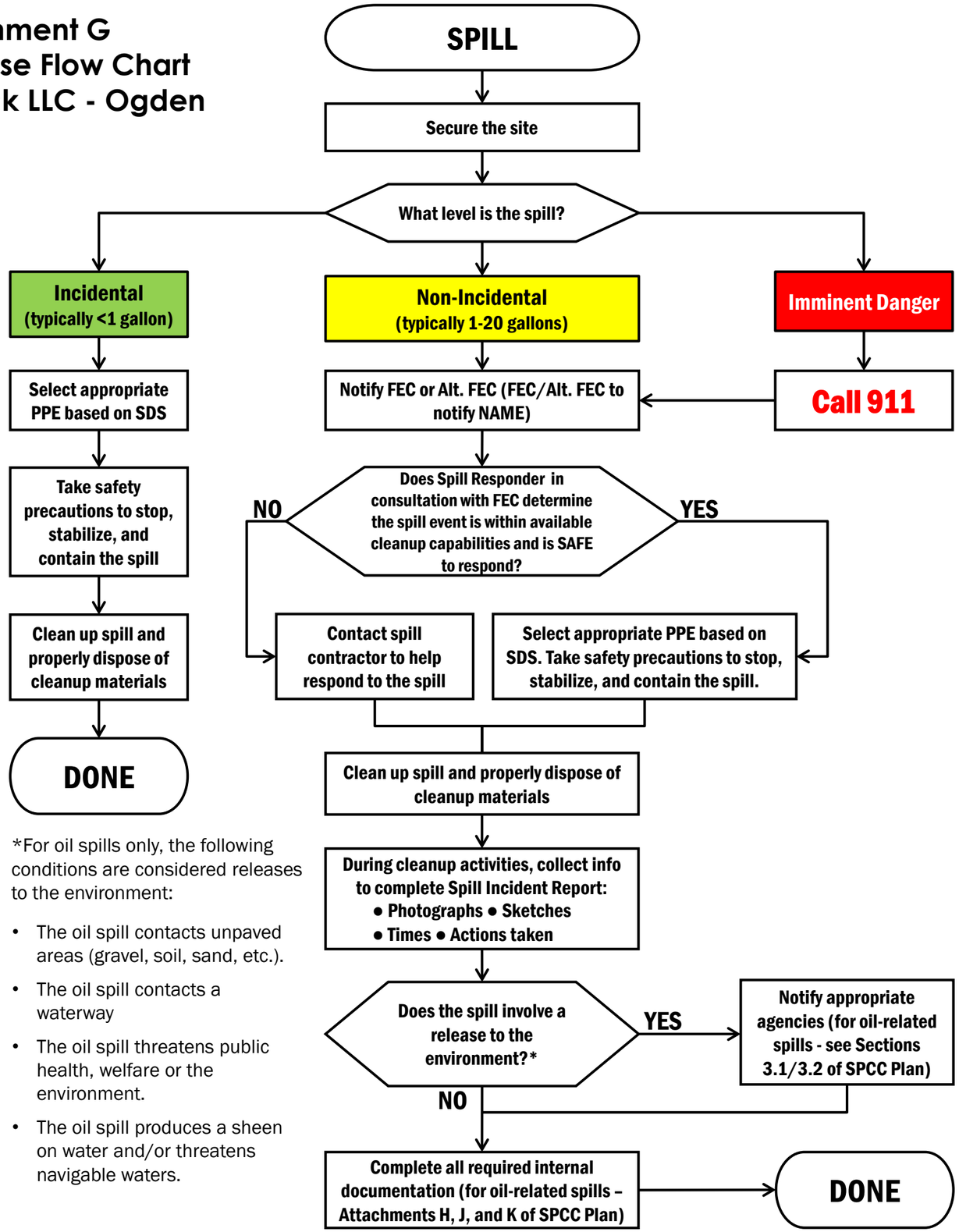
Other Phone Numbers:

Chem-Tel	800-255-3924
RCRA Hotline	800-424-9346

Cleanup Contractor-Petroleum:

Clean Harbors	210-304-3000

*Report all spills and overfills > 25 gallons or any spills that produces a sheen on water and/or threaten navigable waters to State of Texas Spill Reporting Hotline.



*For oil spills only, the following conditions are considered releases to the environment:

- The oil spill contacts unpaved areas (gravel, soil, sand, etc.).
- The oil spill contacts a waterway
- The oil spill threatens public health, welfare or the environment.
- The oil spill produces a sheen on water and/or threatens navigable waters.

Appendix H

Notice to Petroleum Product Vendors

NOTICE TO PETROLEUM PRODUCT VENDORS

April 2022

To: Bulk Petroleum Product Vendors
From: Meridian Brick LLC - Ogden ● Phone: (830) 310-3627

Petroleum product vendors who deliver, load, unload, or pick up petroleum/oil-based products or used oil to or from our facility are required to comply with the following:

Exercise caution when maneuvering vehicles to avoid damage to secondary containment structures.

Drivers are to be present and alert while monitoring the transfer of petroleum product full time while product is being transferred to or from on-site storage containers.

Chock the tank truck wheels while loading or unloading tanks and do not remove the wheel chocks until after the transfer is complete and the transfer hose is disconnected to prevent an accidental drive-off without removing the transfer hose.

Prior to filling and departure, closely inspect for discharges at the lowermost drain and all outlets of the tank truck, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

Continuously monitor for potential tank overfills while loading or unloading storage containers. Check the freeboard capacity of containers prior to filling to estimate the volume to fill the tank and visually monitor the filling process to ensure the tank does not overfill. For tanks with audible air vent alarms, continuously listen for the audible air vent overfill warning whistle.

Promptly stop and clean up any petroleum product leaks or spills that occur while loading or unloading containers.

Immediately report leakage or spillage requiring assistance of site personnel for clean up to the Faclility Office.

Prior to loading/unloading, place an empty container under the hose end to be disconnected first with enough capacity to catch the remaining liquid in the transfer hose. Verify that appropriate valves are closed before disconnecting loading/unloading lines. Prior to disconnecting the transfer hose, gravity drain remaining product in the hose to the lowest container.

This notice is provided for your information to make you aware of these requirements to help us limit the potential for spills at this facility during transfer operations.

Appendix I

Annual SPCC Plan Review

Annual SPCC Plan Review

Meridian Brick LLC - Ogden

Review this plan annually. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item receiving a "no" will be described and addressed immediately.*

Review the following:	Yes	No	If no, describe the action to be taken and note the date that the issue was corrected.
The plan has been certified either by a Professional Engineer or has been self-certified[1] within the past 5 years.			
Sources at the facility are identical to those listed in Table 1 in quantity, description, and contents.			
All source locations on the plan figures are still accurate compared to what is at the facility (no sources have been added, moved or removed)[2].			
Inspection forms have been completed at the appropriate interval for all sources as required by the plan, and completed inspection forms are retained going back a minimum of 3 years.			
All oil-handling personnel have received annual SPCC training, and there is documentation of the training kept on file.			

1. Meridian Brick, LLC – Ogden has a storage capacity greater than 10,000 gallons; therefore, this SPCC Plan is required to be certified by Professional Engineers.
2. The facility's SPCC Plan must be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for discharge as described in 40 CFR 112.1(b). Examples of changes that may require amendment of the SPCC Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility.

Reviewer Name: _____ **Date Reviewed:** _____

Appendix J

Amendment Log

Self or Engineer's SPCC Plan Review and Amendment Log (Future Changes)
Meridian Brick LLC - Ogden

In accordance with 40 CFR 112.5(b), a review and evaluation of the SPCC Plan is required at least once every 5 years from the date the facility became subject to the SPCC regulations. In addition, a facility's SPCC Plan must be amended by the owner or operator when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for discharge as described in Section 112.1(b). Examples of changes that may require amendment of the SPCC Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility.

No technical amendments to this SPCC Plan shall be considered effective to satisfy requirements unless certified by a professional engineer in accordance with Title 40 Code of Federal Regulations (CFR), Part 112.5(c).

SPCC PLAN AMENDMENT SUMMARY

I have completed a review and evaluation of this SPCC Plan. Information on my review and decision on amending this SPCC Plan is given below. I understand that if significant changes have occurred to this facility since the last review, the SPCC Plan must be amended or recertified by someone familiar with the provisions of 40 CFR 112 (self-certified or Professional Engineer. If necessary, the amendment certification can be found as **Attachment J**.

SPCC Plan Review Amendment Summary

Review Date	Did the Plan Require Amendments?		Name and Signature of Person Authorized to Review the Plan
	Yes	No	
2022			New Plan

Appendix K

Plan Amendment Certification

Plan Amendment Certification
Meridian Brick LLC - Ogden

If major changes to the facility have occurred since the last review, the SPCC Plan is to be updated and amended. Examples of changes that may require amendment of the SPCC Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility.

For this facility, the plan amendments are required to be certified by a professional engineer.

I am familiar with the Spill Prevention, Control, and Countermeasures provisions and I have visited and examined the facility. I attest and certify the technical amendments to the plan were prepared in accordance with good engineering practices, in consideration of industry standards, that procedures for required inspections and testing have been established, and that the amendments are adequate for the facility.

Review Date	Description of Technical Amendment	Name and Signature of Person Certifying this Amendment	PE Registration Stamp

MANAGEMENT APPROVAL

This SPCC Plan amendment is fully approved by the director and has been implemented as described herein.

Name (please type or print) _____ Signature _____

Title _____ Date _____

Appendix L

Secondary Containment Drainage Log

CONTAINMENT AREA STORM WATER DISCHARGE LOG

Meridian Brick LLC - Ogden

This record must be completed if storm water / rainwater from a containment area is drained from an AST containment structure. The accumulated water in the secondary containment will be released under responsible supervision. If presence of petroleum, sheen, or order are found, do not discharge water and contact the Plant Manager

Date	Containment Area / Tank ID	Presence of Petroleum, Odor or Sheen	Approximate Volume	Start Time	Completion Time	Person Conducting Discharge

Once completed, this form must be maintained at the facility for a minimum of 3 years.

Appendix M

Texas Spill Reporting Poster

Report Spills or Discharges in Texas to 1-800-832-8224

The Who, What, and Where of Spill Reporting

A responsible party must report a spill of a reportable quantity (RQ) as soon as possible but not later than **24 hours after the discovery of the spill or discharge** to the Texas Spill Reporting Hotline at 1-800-832-8224 or the appropriate regional office of the TCEQ during normal office hours.

The RQ depends on the substance released and where it was released. To determine whether you must report and under what rule, use the Reportable Quantities Table. <www.tceq.texas.gov/response/spills/spill_rq.html>

Depending on location and type of spill, reporting could be to another state agency such as the Texas General Land Office or the Railroad Commission of Texas.

Summary of What to Do After a Spill

Answer these questions:

- What type of material spilled?
- What is the amount of material spilled?
  - Oil, petroleum product, and used oil will be in gallons.
  - Hazardous substances and industrial solid waste will be in pounds.
- Was the spill onto land or into waters of the state?
- Is it a reportable quantity?
  - If so, what is the appropriate agency to report the spill to?

Mitigate, contain, and remediate all spills and discharges.

What to Include in the Initial Report

Contact information:

- The name, address and telephone number of the person making the telephone report.
- If different from above, the names, addresses, and telephone numbers of the responsible person and the contact person at the location of the discharge or spill.

What and where:

- The date, time, and location of the spill or discharge.
- A specific description or identification of the oil, petroleum product, hazardous substances or other substances discharged or spilled.
- An estimate of the quantity discharged or spilled and the duration of the incident.
- The source of the discharge or spill.
- The name of the surface water or a description of the waters in the state affected or threatened by it.
- A description of the extent of actual or potential water pollution or harmful impacts to the environment and an identification of any environmentally sensitive areas or natural resources at risk.
- Any known or anticipated health risks.
- A description of any actions that have been taken, are being taken, and will be taken to contain and respond to the discharge or spill.

Response and actions:

- The identity of any governmental representatives, including local authorities or third parties, responding to it.
- Any other information that may be significant to the response action.

For additional information on initial notification requirements, refer to Title 30, Texas Administrative Code Section 327.3.

Examples of Reportable Quantities

Kind of Spill	Where Discharged	Reportable Quantity	Agency
Petroleum product, used oil (e.g. hydraulic fluid)	Onto land, or onto land from a non-exempt PST facility	25 gallons	TCEQ
Petroleum product, used oil	*Onto land, from an exempt PST facility	210 gallons (five barrels)	TCEQ
Any oil	Into coastal waters	As required by the Texas General Land Office	Texas General Land Office (1-800-832-8224)
Industrial solid waste (e.g. lime slurry)	Into waters in the state	100 pounds	TCEQ
Hazardous substance (e.g. 2,4-D herbicide)	Onto land	see Table 302.4 in 40 CFR §302.4	TCEQ

* Petroleum storage tank (PST) exempted facilities are electric service facilities including generation, transmission, distribution equipment and transformers; petrochemical plants; petroleum refineries; bulk loading facilities; and pipelines that are exempted from the Aboveground Storage Tank (AST) program under 30 TAC, Subsection 334.123(a)(9) and (b), and 30 TAC, Subsection 334.124(a)(4).

Additional Resources

See the Spills and Discharges webpage <www.tceq.texas.gov/response/spills> | 30 TAC Chapter 327 – Spill Prevention and Control <www.tceq.texas.gov/goto/view-30tac> | EPA's Consolidated List of Chemicals [PDF] <www.epa.gov/sites/production/files/2015-03/documents/list_of_lists.pdf> | EPCRA Section 302 Extremely Hazardous Substances | CERCLA Hazardous Substances | EPCRA Section 313 Toxic Chemicals | CAA 112(r) Regulated Chemicals for Accidental Release Prevention