Spill Prevention, Control and Countermeasure Plan

Prepared for
Killark Division of Hubbell
2112 Fenton Logistics Park Blvd
Fenton, MO 63026
December 3, 2019

Brown and Caldwell Project 151962.104

1 Tech Drive, Suite 310
Andover, MA 01810

Emergency Contact Information

Facility Contacts			
Primary Response Coordinator			
Name:	Steve Kerr	Office Number:	(314) 678-7200
Title:	Health Environmental Safety Manager	Cell Number:	(314) 452-7844
Secondary Response Coordinator			
Name:	Will Modelski	Office Number:	(314) 678-7153
Title:	Maintenance Lead	Cell Number:	(314) 566-9850
Spill Response Contractor(s)			
Illini Environmental Inc.		Emergency Number	(618) 216-8600
Federal Agency Contacts			
National Response Center		(800) 424-8802	
EPA Region VII Emergency Response Hotline		(800) 223-0425	
State Agency Contacts			
Missouri State Emergency Management Agency 2302 Militia Drive, Jefferson City, MO 65101 U. S.		(573) 526-9100	
Missouri Department of Natural Resources 1107 Riverside Drive Jefferson City, MO 65102-0176		(800) 361-4827 (Main Line) (573) 634-2436 (Environment Emergencies)	
Local Agencies			
Fenton Fire District		911 636-343-4188 (Non-emergency)	

General Information

Killark Division of Hubbell
2112 Fenton Logistics Park Blvd
Fenton, MO 63026

Directions:

Types of Operations: The Killark Electric facility of Hubbell, Inc. specializes in the production and manufacture of industrial lighting and electrical enclosures. Production and manufacturing activities consist of machining, painting and assembly.

Operating Hours: 2 shifts, Monday – Friday

Oil Storage Capacity: 4,790 gallons above-ground

Designated Person Responsible for Spill Prevention: Steve Kerr, Environmental, Health and Safety Manager Director

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Section 1

General Applicability [40 CFR 112.1]

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for Killark Division of Hubbell (Killark), pursuant to Federal Regulations promulgated in 1973 [Code of Federal Regulations (CFR), Title 40, Chapter I, Subchapter D, Part 112 – Oil Pollution Prevention] as amended on July 17, 2002, November 5, 2009 and subsequent revisions to those amendments. The objective of the SPCC Plan is to prevent the discharge of oil from non-transportation related onshore and offshore facilities into or upon the navigable waters of the United States or adjoining shorelines.

For the purpose of this SPCC Plan, the following are defined in 40 CFR 112.2:

- "Oil" means oil of any kind or in any form, 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; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.
- "Discharge" includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil.
- "Non-transportation related" means pipelines, highway vehicles, storage tanks, and other equipment that is *not* used for the transport of oil in interstate or intrastate commerce.
- "Navigable Waters of the United States", as defined by the November 26, 2008 Amendment to the SPCC Rule, means "navigable waters" as defined in Section 502(7) of the Clean Water Act, and includes:
    1. All navigable waters of the United States, as defined in judicial decisions prior to the passage of the Clean Water Act, and tributaries of such waters;
    2. Interstate waters;
    3. Intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and
    4. Intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.

The SPCC Plan regulations apply to any owner or operator of a non-transportation related onshore or offshore facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful.

Harmful quantities include discharges of oil that:

- Violate applicable water quality standards, or;
- Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

More specifically, the SPCC Plan regulations apply to:

- All facilities that have an above ground aggregate storage capacity exceeding 1,320 gallons of oil, excluding containers that are "permanently closed" and containers with volumes less than 55 gallons; and
- All facilities that have a completely buried oil storage capacity greater than 42,000 gallons of oil, excluding containers that are "permanently closed" and only including tanks that are not currently regulated by a State underground storage tank program. Compliance with applicable State programs is discussed in Section 7.17.

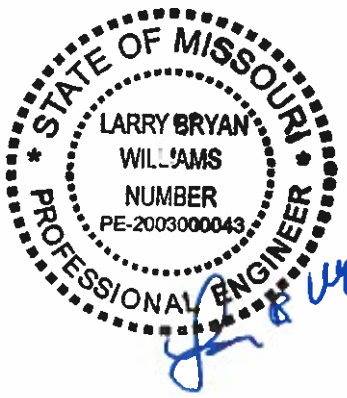
1.1 Facility-Specific Applicability

Killark is a non-transportation related, onshore facility engaged in storing, transferring, and consuming oil products, and could reasonably be expected to discharge oil in quantities that may be harmful. The Facility has an aggregate above-ground oil storage capacity of approximately 4,790 gallons, which is greater than the 1,320-gallon applicability threshold. Stormwater flows over the ground surface to bioretention areas, to a Municipal Separate Storm Sewer (MS4) that discharges to the Meramec River. As described in the oil storage inventory located in Table 2, any oil spilled on-site will be entirely contained within the building with the following exceptions: the Loading Dock (transfer area 1 (T-1)), the used oil transfer area (T-2), and the emergency generator fuel tank (Source 6) . All oil transfer activities are limited to these three areas. The facility is not equipped with catch basins in the parking areas and travel lanes. Any oil spilled on site would flow to the retention areas. As such, it is unlikely but possible that oil could be discharged from the site. Therefore, Killark has chosen to prepare this SPCC Plan for the facility. Based on this information, the Facility is subject to the SPCC regulations, specifically, sections 112.1 through 112.8.

Section 2

Professional Engineer Certification
[40 CFR 112.3(d)(1)]

By means of this certification, I attest that I am familiar with the facility and with the requirements of the Federal Oil Pollution Prevention Regulation [40 CFR 112] and the applicable state's Spill Prevention Regulations, that I or my designated agent have visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR 112, that the procedures for required inspections and testing have been established and that the Plan is adequate for this facility.



Engineer: Larry B. Williams
Registration Number: 2003000043
Expires: December 31, 2019
State: Missouri

Section 3

Management Approval

This SPCC Plan establishes preparedness, prevention, planning, spill response, and spill notification procedures as set forth in applicable state and federal regulations. This Plan has been compiled by an agent of and reviewed and certified by a professional engineer following the sequence specified in 40 CFR 112. Any future updates that require the Plan to deviate from that sequence will include a cross reference in the Plan.

As specified in 40 CFR 112.3(e), a copy of this Plan will be maintained at the facility and made available upon request for on-site review by the Regional Administrator of the USEPA during normal business hours.

This facility is committed to the prevention of discharges of oil to navigable waters and the environment and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of the SPCC Plan. This Plan has the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan.

Signature: _____ Date: _____

Name (type or print): Warren Jenkins

Title: VP & General Manager

Section 4

Written Spill Reports [40 CFR 112.4]

4.1 USEPA Reporting

As discussed below in Section 7.7, immediate verbal notification to the National Response Center is required whenever a release of any quantity of oil to navigable waters occurs. A written report is required to be sent to the Regional Administrator of the United States Environmental Protection Agency (USEPA) within 60 days of the following discharge events (***Note*** that *discharge* means to a navigable waters or adjoining shoreline):

1. A discharge of over 1,000 U.S. gallons of oil occurs in a single event, or
2. It is the second discharge event occurring within any 12-month period of more than 42 U.S. gallons of oil.

This report is to contain the following information (a Spill Report Form is provided in Appendix A of this Plan):

a. Name of the facility;
b. Name(s) of the person reporting;
c. Location of the facility;
d. Maximum storage or handling capacity of the facility and normal daily throughput;
e. Corrective action and countermeasures that were taken, including a description of equipment repairs and replacements;
f. An adequate description of the facility including maps, flow diagrams, and topographical maps as necessary;
g. The cause of such discharge, including a failure analysis of the system in which the failure occurred;
h. Additional preventive measures that were taken or contemplated to minimize the possibility of recurrence; and
i. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Prepare reports using the Spill Report Form in Appendix A of this Plan, and submit to:

USEPA New England
Region 7
11201 Renner Boulevard
Lenexa, KS 66219

4.2 State Reporting

As discussed below in Section 7.7, owners and operators of aboveground storage tanks (ASTs) shall report any suspected or confirmed release of a regulated substance to the Department of Natural Resources' Emergency Spill Line at (573) 634-2436 at the earliest practical moment within twenty-four (24) hours of discovery of the suspected or confirmed release. Immediately upon discovery or observation of regulated substances on the ground surface or in groundwater, surface water, or subsurface soils, the owner or operator shall complete the following:

The initial release response measures described in section (7) of this rule are as follows:

- Section (7) Initial Release Response Measure. Owners or operators of ASTs shall:
  - Remove as much of the regulated substance from the AST as is necessary to prevent further release to the environment;
  - Visually inspect any released substances and prevent further migration of the release into surrounding soils and groundwater;
  - Monitor and mitigate any environmental hazards posed by vapors of free product that have migrated from the AST site and entered subsurface structures utility conduits or trenches;
  - Remedy hazards posed by excavated or exposed contaminated soils that result from initial release response activities. Any treatment or disposal of contaminated soils shall be in compliance with applicable state and local requirements;
  - Collect and analyze at least one (1) soil or groundwater sample as necessary to establish the presence of contamination. The sample(s) must be collected in a location where contamination is most likely to be present at the AST site. In selecting the location of the sample(s), the owner or operator shall consider the nature of the stored substance, the type of backfill around the release if outside the secondary containment, or the secondary containment if the secondary containment is not constructed of impermeable material, depth to groundwater, and all other factors appropriate for identifying the presence and source of the release; and
  - Investigate the site to determine whether free product is present. If free product is present, then free product removal activities shall begin immediately.

Section 5

SPCC Plan Amendment [40 CFR 112.5]

The SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge. The amendment to this SPCC Plan will be prepared within six months following any change and implemented immediately but no later than six months following preparation of the amendment.

All Revisions

All revisions will be documented on Table 1 – Plan Amendment/Revision Log form, on the following pages, and should include the information shown on the form.

Any technical amendment to the SPCC Plan will be certified by a Professional Engineer (P.E.) in accordance with 40 CFR 112.3(d). Some examples of types of facility changes that do and do not require review and certification by a P.E. are listed below:

Examples of Facility Changes that Require P.E. Review and Certification:

a. Construction or demolition of secondary containment system;
b. Adding, removing or moving of oil containers to a new location (i.e., a change in the amount, type, or location of oil storage containers);
c. Installation or replacement of oil piping systems; or
d. Any other facility change that materially increases the potential for an oil spill.

Examples of Facility Changes that DO NOT Require P.E. Review and Certification:

a. A change in emergency coordinator, contacts, or local authorities.

5-Year Review

A review and evaluation of this SPCC Plan also will be conducted **at least once every 5 years**, and documented in Table 1 on the following page. As a result of this review and evaluation, if applicable, the SPCC Plan will be amended within six months of the review to include more effective prevention and control technology if such technology will significantly reduce the likelihood of a spill event from the facility, and such technology has been field-proven at the time of the review.

SPCC regulations allow self-certification for qualifying facilities, providing that any alternative measures or deviations, such as those listed in the "Conformance with Applicable Requirements" section of the Plan are not required to be certified by a P.E. as alternative measures. If there are no technical amendments to the SPCC Plan since P.E. certification, and the facility is still a qualifying facility, the SPCC Plan may be self-certified.

Missouri Board for Architects, Professional Engineers, Professional Land Surveyors, and Professional Landscape Architects (APEPLSPLA) has concluded that preparation and self-certification of SPCC plans are engineering responsibilities that must be performed by licensed professional engineers (PEs). Consequently, SPCC plans for Tier I or Tier II qualified facilities may not be self-certified and must be sealed by a Missouri PE.

Table 1. Plan Amendment/Revision Log

Any technical amendments to this Plan will be certified by a P.E. The signature of the person making the change attests that the Plan revision information is true and accurate. Previous authors are not responsible for the revisions.

Review Date	Description of Amendment (include Section(s) of the Plan modified)	Name/Signature of Person Making Change	P.E. Certification Req'd?	
			Yes(1)	No
12/2/2019	New Plan for new facility	Brown and Caldwell	Yes	

(1) If P.E. certification required, stamp, sign and date the P.E. Certification page with the same date

Section 6

Qualified Facility Plan Requirements [40 CFR 112.3(g) & 112.6]

This facility has an aggregate above-ground oil storage capacity of approximately 4,790 gallons, which is less than the 10,000-gallon threshold for a qualified facility specified in 40 CFR 112.3(g). According to the Missouri Board of Professional Engineers, SPCC plans must be P.E. certified.

Section 7

General Requirements [40 CFR 112.7]

This SPCC Plan is arranged in the sequence specified in Section 112.7 of the regulation. This section provides information required by Section 112.7 of the SPCC Regulation. Management approval is discussed in Section 3.

7.1 Conformance with Applicable Requirements [40 CFR 112.7(a)(1) and (a)(2)]

As discussed below, the facility is in conformance with all applicable requirements of 40 CFR Part 112. No alternative measures were utilized.

7.2 Facility Information [40 CFR 112.7(a)(3)]

7.2.1 Location of Facility

This facility is located in northern Fenton, Missouri, south of the Meramec River and north of Interstate 44. The site is surrounded by Industrial properties.

7.2.2 General Description of Facility

The facility began operations as Hubbell Incorporated Killark Division in 2019. The facility manufactures electrical devices for harsh and hazardous environments. The manufacturing area is in the center of the building. The plant employs approximately 220 employees and operates two shifts per day, five days per week. The property is secured at all times and monitored 24 hours per day by security alarm-monitoring services.

The facility consists of one building which houses offices, maintenance, machining, painting, and assembly areas, and petroleum and synthetic oils storage areas. A facility Map is included as Figure 1. Operations include light manufacturing of industrial lighting and electrical enclosures for harsh and hazardous environments. The majority of the property is either occupied by the building or is paved.

7.2.3 Topography and Surface Water Flow

The overall topography of the area is graded away from the building to the northwest or southeast toward the bioretention basins. Stormwater discharges from the bioretention areas flows to the Meramec River via a Municipal Separate Storm Sewer (MS4) operated by the Metropolitan Sewer District (MSD). A Site Plan is included as Figure 2.

7.2.4 General Description of Petroleum Storage Areas [112.7(a)(3)(i) and (iii)]

This section provides a general description of petroleum storage areas at the facility such as secondary containment or other structures, equipment and procedures for the control of a discharge.

There are three general types of activities at the Facility that are subject to SPCC regulations: 1) oil storage containers; 2) oil-filled operational equipment, i.e., machining; and 3) oil transfer activities.

Oil storage area identification, container and oil types, capacities, and identification of specific or general secondary containment requirements are provided in Table 2. Details for secondary containment is provided in Appendix B. Oil storage locations are presented in **Figure 1**.

Table 2. Oil Storage and Handling Summary

Source Number[1]	Container Location	Container Type and Material	Contents	Total Storage Capacity (gallons)	General or Specific Secondary Containment Description[2]
1	Drag line termination	Synthetic AST	Kroff Coolant / water mix (cutting fluid)	2,000	Specific
2	MRO / Kit Storage Area	Steel Drum	Cleaner	55	Specific
3	MRO / Kit Storage Area	Steel Drum	Kroff Coolant	55	Specific
4	MRO / Kit Storage Area	Steel Drum	Hydraulic oil	55	Specific
5	MRO / Kit Storage Area	Steel Drum	Way oil	55	Specific
6	NW Corner of facility	Steel AST	Diesel Fuel	380	Specific
7	Drag line termination	Concrete sump within larger pit	Kroff Coolant / water mix (cutting fluid)	68	Specific
Oil-Filled Equipment					
A	DMC 125 U deckel maho (2013)	OFE	Kroff Coolant / water mix	259	General
B	DMC 125 U duoBLOCK deckel maho (2008)	OFE	Kroff Coolant / water mix	259	General
C	DOOSAN VC 500	OFE	Kroff Coolant / water mix	71	General
D	DMC 80 U	OFE	Kroff Coolant / water mix	259	General
E	DMU 50	OFE	Kroff Coolant / water mix	159	General
F	HAASS	OFE	Kroff Coolant / water mix	8	General
G	DMM 750	OFE	Kroff Coolant / water mix	106	General
H	300M (8)	OFE	Kroff Coolant / water min	53	General
I	VC430 cell A	OFE	Kroff Coolant / water min	79	General
J	DOOSAN 630	OFE	Kroff Coolant / water mix	95	General
K	DOOSAN VC 430 cell b	OFE	Kroff Coolant / water mix	79	General
L	2600SY (2016)	OFE	Kroff Coolant / water mix	66	General
M	2600Y-II	OFE	Kroff Coolant / water mix	66	General
N	300M (10)	OFE	Kroff Coolant / water mix	53	General

Table 2. Oil Storage and Handling Summary					
Source Number[1]	Container Location	Container Type and Material	Contents	Total Storage Capacity (gallons)	General or Specific Secondary Containment Description[2]
O	2600SY (2018)	OFE	Kroff Coolant / water mix	66	General
P	2600Y (HKB)	OFE	Kroff Coolant / water mix	66	General
Q	SICK C4000 MULIPRESS (4 poster hydraulic press)	OFE	Kroff Coolant / water mix	66	General
Oil Transfer Location					
T-1	Building Loading Dock	55-gallon Drums	Used and Virgin Oil and Lubricants (Hydraulic, way, coolant, cleaner)	NA	General Secondary Containment
T-2	Used Oil Pickup from Source 1 (2,000 gallon AST)	55-gallon Drums	Used and Virgin Oil and Lubricants (Kroff)	NA	General Secondary Containment
T-2a	Drag-line trough	Concrete trough	Kroff Coolant / water mix	NA	General Secondary Containment
T-3	Emergency Generator Diesel Delivery	Steel AST	Diesel	380	General Secondary Containment
			Facility Maximum Total Oil Storage Capacity:	**4,790 gallons**	

1. Keyed to Site Plan
2. Specific secondary containment provisions under 40 CFR 112.8(c) require 100% secondary containment for bulk storage containers. General secondary containment provisions under 40 CFR 112.7(c) require secondary containment to address the most likely oil discharges from oil-filled equipment and oil transfer areas. See Appendix B for secondary containment details for each storage location and transfer area.
3. A vacuum truck is used to remove used oil from AST at T-2.
4. A conveyer type drag line is used to transfer metal shavings from the CNCs to a scrap metal dumpster. The drag line sits in a trough that is pitched toward an oil collection sump that sits within a larger pit at the termination of the drag line. Trough details are included in Appendix B.
5. The facility is equipped with a dry-type electrical transformer located proximate to the emergency generator (**Source 6**). As a dry unit, it is not subject to the requirements of 40 CFR 112.

7.3 Discharge Prevention Measures [40 CFR 112.7(a)(3)(ii)]

This section discusses procedures for routine handling of oil products at the facility, including loading, unloading, internal drum transfers, and fuel transfers. Virgin oil drum deliveries to the facility are received at the Building loading dock (**T-1**). Virgin oil will be transported from T-1 to the process areas via an internal route. Internal drum transfers will be conducted by facility personnel trained in accordance with the requirements of 40 CFR 112.7(f). Used oil from the AST (Source 1) is transferred to the tank truck at **T-2** for off-site shipment. Used oil (machining coolant) is drained from the machines (Sources A-Q) to the drag line trough (**T-2a**), flows to the collection sump (Source 7) and is pumped to the used oil AST (Source 1). Diesel deliveries will be transferred to the emergency generator AST located at **T-3**. A description of Killark's procedures for oil and fuel deliveries and used oil pickups as well as internal transfer procedures are included in Section 7.15 of this Plan.

Secondary containment for deliveries and for used oil shipments is accomplished using the following active secondary containment measures. In the event of a spill, secondary containment will be provided either by the impervious asphalt or active measures (i.e., absorbent material, spill booms, etc.) to contain oil on the asphalt and concrete until appropriately managed. A description of the

deployment of active measures and an explanation of how the use of active measures is appropriate for these transfer areas is included in Section 7.15. A calculation of the necessary sorbent inventory is included in Appendix B.

7.4 Spill Response and Countermeasures [40 CFR 112.7(a)(3)(iv)]

Procedures for responding to spills of fuel or oil products are provided below. Personnel shall immediately respond to spills to prevent materials from discharging off site or entering a waterway or sewer.

Spill response procedures for oils and other chemicals are also provided in Appendix A for easy access during a spill. The Facility's standard approach toward spill response is summarized below:

- Assess hazards:
  - Assess the quantity and type of substance spilled and integrity of containment, if applicable;
  - Stop affected operations if necessary and if able to do so safely;
  - Secure the area; and
  - Determine if the spill could potentially impact waterways or leave the site.
- Isolate the source by closing open valves or containers, deactivate pumps, up righting containers contributing to the spill as appropriate.
- Immediately notify the EHS Manager, who will notify others (including external reporting) as appropriate.
- Use all equipment and manpower at facility's disposal to minimize the amount of oil spilled and to prevent it from entering any navigable waterways.
- Once the spill is stopped and contained, use absorbent materials to absorb the spilled oil. The oil-soaked material must be disposed of according to federal, state, and local regulations. (For a spill greater than 5 gallons, notify the EHS Manager who will notify Illini Environmental Inc. (environmental Contractor) for assistance if necessary.
- If spill is reportable (See Section 7.7), the EHS Manager will immediately notify authorities listed on Emergency Contact List at the front of this Plan.
- In the event a spill reaches a waterway, the EHS Manager will:
  - Notify the National Response Center (800-424-8802) and local and state spill response agencies;
  - Notify spill response contractor if necessary;
  - Stop the source of the spill immediately;
  - Shut down all equipment and ignition sources in the area;
  - Deploy booms, damming materials, and absorbents to contain the spill;
  - Restore habitat if necessary; and
  - Decontaminate the affected area, equipment, and surfaces that have contacted the spilled material.

7.5 Recovery and Disposal of Material Spilled [40 CFR 112.7(a)(3)(v)]

Until a release or spill has been effectively mitigated, the affected areas should be cordoned off and appropriate signs should be placed in prominent locations to keep unauthorized persons out until the EHS Manager (Response Coordinator) or Alternate determines that it is safe to access these areas.

Petroleum spills at the Facility most likely will have been contained by secondary containment structures (bulk storage containers and oil-filled equipment) or using active measures during oil transfer procedures to contain the spill on impervious surfaces. If a spill escapes the containment used during transfer, soil contamination is possible. Contamination of surface water is possible but unlikely since the facility-owned bulk storage containers and oil-filled operational equipment are mostly located either within a building with adequate secondary containment; fuel and oil transfers occur in areas with no catch basis, Killark personnel are always present during transfer procedures, and active measures are available for deployment in the event of a discharge.

After an incident involving a release of oil or fuel products, the surface in contact with the spilled material should be decontaminated by an appropriate method permissible under local, state, and federal laws. The method of clean up and decontamination will depend on the substance spilled and will be determined by the Emergency Coordinator or by the contractor responsible for clean up if the Emergency Coordinator determines a spill response contractor should be contacted to arrange for the proper handling, treatment, and disposal of the spilled material and any contaminated materials or soil.

Spilled material and debris will be managed in a manner pursuant to applicable local, state, and federal laws regarding the recycling and disposal of waste. All material will be recovered into appropriate containers such as 55-gallon drums, or if the size of the spill warrants, into a roll-off container(s). When containers are filled after a cleanup, the containers will be secured while awaiting contractor removal and disposal and appropriately labeled identifying the substance(s), the date of the spill/clean up, and the spill location. Waste material generated during cleanup activities will be characterized in accordance with federal and state regulations. The spill residual will be characterized and disposed of by a licensed waste handler. No waste that may be incompatible with the spilled material will be treated, stored, or disposed until cleanup procedures are completed.

7.6 Emergency Contact List [40 CFR 112.7(a)(3)(vi)]

The Emergency Contact List, which is provided at the front of this SPCC Plan (page ii), includes emergency contact names and phone numbers for facility personnel, spill response contractors, and other appropriate agencies.

7.7 Spill Reporting Procedures [40 CFR 112.7(a)(4)]

Any spill with an estimated volume of greater than 5 gallons should be reported to the EHS Manager. Records of each spill event should be documented using the Spill Report Form in Appendix A. This information will facilitate the proper reporting of a discharge to the appropriate individuals and agencies.

Any spill that results in the discharge of oil, petroleum based product, or hazardous material into navigable or contiguous waters must **immediately** be reported to the EHS Manager (Response Coordinator) who will contact the agencies listed below. **The National Response Center should be contacted first.**

- National Response Center (800) 424-8802
- USEPA Region 7, Emergency Response (800) 223-0425
- Department of Natural Resources Emergency Spill Line (573) 634-2436

This information is also provided in the Emergency Contact List at the front of this Plan. For written reporting requirements, refer to Section 4.0 of this Plan.

7.8 Spill Response Procedures [40 CFR 112.7(a)(5)]

Killark's general procedures for discovery, response, and cleanup of oil spills are provided in Section 7.4 of this Plan and included in Appendix A with a spill reporting form for easy access.

7.9 Spill/Release Scenarios [40 CFR 112.7(b)]

Based on how and where oil and other petroleum products are used and stored at this facility, Table 3 describes: the most likely potential types of spill/release scenarios; the probable flow direction of a spill/release; the predicted spill rate; and estimated release volumes, based on the volume of the largest oil tank in the area.

Table 3. Potential Spill Scenarios

Potential Equipment Failure	Spill Direction	Predicted Maximum Spill Rate (gallons/minute)	Predicted Maximum Volume Discharged (gallons)[3]
ASTs			
2,000-gallon AST (Source 1) Leak or Rupture	Into secondary containment (double walled tank)	0	0 (into containment)
380-gallon AST (Source 6) Leak or Rupture	Into secondary containment (double walled tank)	0	0 (into containment)
Drum Storage Areas			
Leak or Rupture	Into containment structure or pallet or floor surface in all directions but contained within building	55 [1]	0 (into containment)
Oil-Filled Equipment			
CNCs[4] and Presses (Spill During Routine Maintenance)	floor surface in all directions but contained within building	5	0 (Contained within building)
Electric Transformer	NA, Dry-Type Unit	NA	NA
Transfer Areas			
Shipping and Receiving Dock (T-1)	Northwest toward bioretention basin	55[1]	0 (Contained on site)
Used Oil Transfer Area (T-2)	Northwest toward bioretention basin	25 (rate of pump on truck)[2]	0 (Contained on site)
Diesel AST (T-3)	Northwest toward bioretention basin	25 (rate of pump on truck)[2]	0 (Contained on site)
Drag line trough	Southeast toward sump	< 1 gallon[5]	0 (Contained on site)

1. For drum ruptures (at storage areas or Shipping and Receiving Dock), it is assumed that catastrophic failure would result in an immediate release of the entire contents.
2. For purposes of calculating a maximum discharge volume, it is assumed that a fuel line leak/rupture during filling would be noticed immediately and the pump stopped in less than 15 seconds because these operations are always attended by the hauler and facility personnel. (Pump rate range is estimated to be between 67-100gpm).
3. A zero value indicates that discharge from the facility is unlikely and takes into account secondary containment and drainage conditions observed in the vicinity of the tanks, containers, and/or drums. Additional containment is provided by the retention basin. However, this plan does not rely on the retention basin. It is considered redundancy.
4. CNC is computer numerically controlled machine.
5. Spills in this area will likely be limited to drips from shavings that are transferred to the drag line. These minor drips will be contained on the floor surface and subsequently removed using sorbent material. A spill of one gallon will spread to a radius of less than 3 feet at equilibrium. See Appendix B for an explanation of spread calculations.

7.10 General Containment Requirement [40 CFR 112.7(c)]

Operations at the Facility that are required to meet the general drainage requirements are: 1) oil-filled operational equipment, including transformers and the CNC machines; 2) the oil transfer activities associated with the shipping and receiving dock (T-1), used oil transfer location (T-2), and diesel deliveries (T-3); 3) internal transfer activities associated with portable containers.

Appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in 40 CFR 112.1(b) has been provided for these operations, as described in the following applicable Sections of this SPCC Plan:

- Information regarding which sources are subject to the general and specific secondary containment provisions Section in 7.2.4 of this Plan.
- Information for transfer activities (filling) associated with the fueling tanks is provided in Section 7.15 of this Plan.
- Detailed information is included in in Appendix B including: containment type and capacities, containment calculations for containment pit, spread calculations for sources that rely on the building for secondary containment, typical failure mode for sources subject to the general secondary containment provisions, sorbent quantity calculations for sources that rely on active measures (i.e., transfer locations), and the presence of spill kits.

7.11 Demonstration of Practicability [40 CFR 112.7(d)]

Killark has determined that the installation and use of containment and diversionary structures and the use of readily available spill equipment to prevent discharged oil from reaching navigable waters, is practicable and effective at this facility.

7.12 Facility and Tank Inspections/Tests [40 CFR 112.7(e); 112.8(c)(6)]

The SPCC regulation requires that oil storage tanks and containers be tested or inspected on a regular schedule, in accordance with industry standards. The Steel Tank Institute (STI) developed a standard for above-ground storage tanks, including shop-fabricated and field-erected tanks up to 50,000-gallons, and portable tanks, storing stable, flammable and combustible liquids with operating temperatures between ambient and about 200 degrees F. STI Standard SP001, "Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids," combines visual inspections with formal external or internal inspections and leak testing, taking into account the size, configuration and design of the containers, as required by 40 CFR 112.8(c)(6). The January 2018 6th edition is the most recent version of this Standard. All of the oil storage containers at this facility will be visually inspected and formally inspected or leak tested (if applicable) in accordance with this Standard. The inspection and testing requirements for each oil storage tank at the Facility are further described in the following subsections and summarized in Table 4 below.

Records of visual inspections, as well as problems and any corrective actions taken, will be kept in Appendix C of this SPCC Plan, or in facility files, for a minimum of 3 years; it is recommended they be kept for the lifetime of the tank. Records of any formal external or internal inspections or integrity tests that may be conducted for oil or fuel storage tanks at the facility will be maintained in the facility's files.

7.12.1 Visual Periodic Inspections

Per the SP001 standard, ASTs are generally considered "Category 1" tanks if they have integral secondary containment or outer containment and are not in contact with the ground. "Category 1" tanks that are less than 5,000 gallons are only required to have periodic visual inspections by a

person designated by the owner, who is knowledgeable of the storage system. Periodic AST inspections do not require internal access to the ASTs nor any quantitative testing methods; the inspection is a thorough external visual inspection of the storage tank system including its supports and foundation.

"Category 1" tanks that are over 5,000 gallons are also required to have a formal external inspection done by a certified AST inspector, every 20 years.

Killark will assign one or more plant staff familiar with the oil ASTs and their containment systems to perform this periodic inspection as part of the monthly and annual SPCC visual inspections. The inspections will be documented on the forms included in Appendix C of this Plan.

If a periodic AST inspection reveals an issue (e.g. deformity, damage, significant corrosion) that may require inspection by a certified AST inspector, the EHS Manager must be contacted to determine the extent of additional testing required and if the AST should remain in-service pending the certified inspection or replacement.

7.12.1.1 Visual Inspection Procedures

The oil storage containers at the facility including the drums and the oil-filled equipment, shall be visually surveyed to discover conditions, if any, which indicate problems that could contribute to an oil leak or spill. As indicated on the inspection checklists in Appendix C, the following inspection procedures are followed:

- For all oil and fuel storage tanks, drums and containers, inspect the containment area, tank or drum shell, supports, and foundation for structural integrity.
- Check all oil piping for dripping, loose joints, damage to supports, and pipe deflection.
- Inspect all containment pallets and containment areas for excess accumulation of water and the presence of oil. Accumulations of oil must be promptly removed. (NA, facility has no outdoor storage exposed to precipitation)
- Inspect the area surrounding the containment areas for signs of oil spills and staining.
- If any problems/deficiencies are identified, contact the individual designated at the facility who is responsible for oil spill prevention (i.e., the EHS Manager) to have it scheduled to be addressed.

Oil storage at the facility includes ASTs, drums, and oil-filled equipment. The oil-filled equipment is not subject to the formal inspection or testing requirements as they are not considered to be bulk storage containers. However, general containment requirements apply, which includes regular visual inspections.

7.12.2 Formal External or Internal Inspections

Based on Table 5.5, Table of inspection Schedules of the Standard for the Inspection of Above Ground Tanks SP001, January 2018 6th Edition, no bulk storage containers require formal external or internal inspections. A formal external or internal inspection means an inspection conducted by a certified inspector. A certified inspector is someone who is certified by API (American Petroleum Institute) or STI (Steel Tank Institute), or similar.

The guidelines for what need to be included in the formal external and internal inspections are outlined in Sections 7 and 8, respectively, of the STI Inspection standard that is included in Appendix B of this Plan. Generally, they involve a visual inspection by the certified inspector of all components of the tank to confirm everything works. The certified inspector should generate a report documenting the condition of the tank; the report may be as simple as the tank passes or does not pass.

7.12.3 Leak Testing Requirements

Based on Table 5.5, Table of inspection Schedules of the Standard for the Inspection of Above Ground Tanks SP001, January 2018 6th Edition, no bulk storage containers require leak testing.

In accordance with the STI Standard, a leak test generally is only required for tanks that are single-walled and in contact with the ground (i.e., a SPCC "Category 2 or 3 tank per the STI SP001 Standard). The frequency depends on the size of the tank.

7.12.4 Inspection and Testing Schedule

The Facility has implemented a program of visual inspection to ensure that any leaks are readily detected, in accordance with the applicable industry standard, STI SP001, 6th Edition, which specifies a schedule as determined by Tables 5.4 and 5.5 of that Standard, and summarized in Table 4 for the bulk storage containers and Oil-filled equipment at this Facility.

Table 4. Tank Inspection and Testing Schedule

Tank ID, Size	AST STI Category(1)	Inspection Requirements(2)
Diesel AST for Emergency Generator	1 (CRDM and Spill Control), (380 gallon double walled)	Periodic Visual Inspection by Owner: Monthly and Annual (3) No formal external/internal inspection required
Used Oil AST	1 (CRDM and Spill Control), less than 1,100 gallons (2,000 gallon double walled)	Periodic Visual Inspection by Owner: Monthly and Annual (3) No formal external/internal inspection required
All 55-gallon oil drums, containers on containment pallets	1, less than 1,100 gallons	Periodic Visual Inspection by Owner: Monthly and Annual (3) No formal external/internal inspection required
Oil-filled equipment	1, less than 1,100 gallons	Periodic Visual Inspection by Owner: Monthly and Annual (3) No formal external/internal inspection required

(1) Based on Section 5.0 of STI SP001, 5th Edition.
(2) Based on Table 5.5 of STI SP001, 5th Edition.
(3) See the inspection forms in Appendix C of this SPCC Plan.
(4) **CONTINUOUS RELEASE DETECTION METHOD (CRDM)** – a means of detecting a release of liquid through inherent design. CRDM is passive because it does not require sensors or power to operate. Liquid releases are visually detected by facility operators. The system shall be designed in accordance with good engineering practice. Several acceptable and commonly used CRDM systems are as follows:
- Release prevention barrier (RPB) (described in definition of release prevention barrier).
- Secondary containment AST, including double-wall AST or double-bottom AST.
- Elevated AST, with or without release prevention barrier.

(5) **SPILL CONTROL** - a means of preventing a release of liquid to the environment, including adjoining property and waterways. Spill control methods include :
- Remote impounding
- Secondary containment dike/berm
- Secondary containment AST
- Secondary containment system

(6) **AST CATEGORIES USED IN TABLE 5.5**
Category 1 - ASTs with spill control, and with CRDM
Category 2 - ASTs with spill control and without CRDM
Category 3 - ASTs without spill control and without CRDM

(7) **RELEASE PREVENTION BARRIER (RPB)** – a liquid containment barrier that is installed under the AST. Its purpose is to divert leaks toward the perimeter of the AST where they can be easily detected, as well as to prevent liquid from contaminating the environment. RPBs are composed of materials compatible with the liquid stored in the AST and meet appropriate engineering standards. Examples are steel (as in steel double-bottom tanks), concrete, elastomeric liners or other suitable materials, provided the above criteria are met.

Requirements for the monthly and annual inspections are provided on the inspection forms in Appendix C.

7.13 Spill Prevention Training [40 CFR 112.7(f)]

Upon beginning employment, all oil handling personnel are instructed by management in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the Facility's SPCC Plan.

The EHS Manager is responsible for spill prevention training at this facility.

Management will provide annual spill prevention briefings for all oil handling personnel to ensure adequate understanding of the SPCC Plan. These briefings highlight any past spill events or failures and recently developed precautionary measures. Training includes inspection methods, oil spill prevention, containment, and retrieval methods. Records of spill prevention training are kept in Appendix D or in facility files, and will be kept for at least three years.

7.14 Security [40 CFR 112.7(g)]

The SPCC rule provides flexibility in how a facility may provide adequate security for its oil storage containers and associated pumps, valves and piping. A description of the security measures implemented at the Facility covered by this Plan is provided below:

1. All oil handling, processing and storage areas oil storage containers are located within the building which remains locked with keyed entry.
2. The facility is not equipped with valves that could permit direct outward flow of oil the facility.
3. The starter control on all oil pumps are located inside the locked building.
4. The facility is not equipped with oil piping for loading or unloading.

5. All oil storage/handling areas are located inside the building and have lighting commensurate with this type of facility to assist in discovery of discharges occurring during hours of darkness. Spills occurring through acts of vandalism are unlikely because all oil storage areas are located inside the building that remains locked. The only oil storage located outside of the locked facility is the emergency generator which is housed in locked units.

7.15 Loading/Unloading Areas and Procedures [40 CFR 112.7(h)]

There is no loading/unloading rack at this facility, but incoming, outgoing, and internal transfers occur as described below.

Secondary containment for deliveries to the Shipping and Receiving Dock (T-1) used oil shipments from the Used Oil Transfer Area (T-2), and diesel deliveries to the emergency generator (T-3) is accomplished using the following active secondary containment measures. No stormwater catch basins are located proximate to the transfer areas. The concrete and asphalt surface is pitched away from the building toward the bioretention areas. In the event of a spill, secondary containment inside the building will be provided by the impervious concrete floor (depending on proximity to an external door without a containment berm) and secondary containment outside the building is provided by the impervious surface and absorbent material (i.e., active measures) including spill booms, granular sorbent material, pads, or equivalent. The sorbents will be used to contain oil on the asphalt and concrete preventing it from reaching the bioretention area until appropriately managed.

The sorbent deployment method in response to a spill external to the building during a transfer procedure will be based on the extent of the spill and at the discretion of the Killark personnel present. Generally, a spill in a transfer area external to the building will flow toward the bioretention area. A sock should be immediately deployed ahead of the flow's front edge and perpendicular to the direction of flow to stop forward progress of the spill. As necessary, loose sorbent, sorbent socks, or sorbent pads will be utilized in quantities commensurate to the spilled quantity. Calculations of the necessary sorbent material amount is included in Appendix B.

Based on the preventative measures in place and the equipment involved, active measures have been determined to be adequate and appropriate based on the following:

- The most likely spill volume is 25 gallons;
- The use of sorbents as an active measure is appropriate because the response material is readily available on site, discharge detection will be immediate because the operation is always manned, the active measure can be deployed immediately.

7.15.1 Shipping and Receiving Dock

Oil is delivered in 55-gallon drums is delivered to Killark's shipping and receiving dock. Material is not stored at the dock, but the occasional staging of new drums occurs. If drums are to be stored inside the dock area, containment pallets must be provided. The following procedures are followed upon receipt of materials to the dock.

1. The loading dock spill kit is inventoried monthly during the SPCC container inspection by Killark employees based on a list inside the kit (taped to the underside of the cover).
2. Prior to unloading a truck, wheel chocks are placed in front of the right the left rear tires.
3. Drums are inspected, removed from the truck, staged in the loading dock area until all drums have been removed from the truck, and the packing slip compared to the delivery.
4. The truck door and bay door are closed and secured.
5. Wheel chocks are removed, and the truck is released by the Killark employee present.
6. All oil drums are transferred to its respective storage area.

In the event of a spill at T-1), follow the procedures in Section 7.4 (duplicated in Appendix A). The sealed catch basin is designed to provide secondary containment until the material can be removed.

7.15.2 Internal Transfer Procedures

Based on the spread calculations contained in Appendix A, a 55-gallon oil spill on a flat concrete floor will have an equilibrium radius of approximately 22 feet. Accordingly, a 55-gallon spill that occurs during an internal transfer at a distance from greater than 22 feet from an external wall is likely to be completely contained within the building until cleanup occurs provided that the floor is free from cracks. The internal transfer route should be inspected prior to transfers to confirm the absence of cracks. In the event of a spill during transfer from the loading dock, follow the procedures in Section 7.4 (duplicated in Appendix A). Spills along the drag line will likely be limited to drips from shavings that are transferred to the drag line. These minor drips will be contained on the floor surface and removed with the use of sorbent material.

7.15.3 Used Oil Transfer Procedures

Used oil is transferred from the machines to the used oil AST and from the used oil AST to a vac truck for off-site management. Associated transfer procedures (internal and external) are described below)

7.15.3.1 Internal Used Oil Transfer Procedures

Used oil (machining coolant) is drained from the machines (Sources A-Q) to the drag line trough (**T-2a**), flows to the collection sump (Source 7) and is pumped to the used oil AST (Source 1). Prior to draining a piece of equipment, the operator must verify that enough capacity exists in the used oil AST. The operator must remain present during the entire draining operation, confirm that the valve is closed subsequent to draining, and visually observe the entire transfer route following transfer to confirm the absence of spills.

7.15.3.2 External Used Oil Transfer Procedures

Used oil (machining coolant) is transported from the Site by Illini Environmental Inc. (Illini) using a vacuum truck to remove used oil from the 2,000 gallon AST (T-2). A description of the transfer procedure followed by Killark personnel is as follows:

1. Killark Personnel are present during all used oil transfer procedures and remain in the area proximate to the transfer until the truck leaves the facility.
2. The Used Oil Transfer location spill kit is inventoried every week by Killark employees based on a list inside the kit. Killark Personnel checks the inspection log prior to initiating the transfer.
3. Prior to initiating the transfer, the driver will back the truck into the high bay such that the hose connection is completely in the building and protected from weather (this is required to maintain the stormwater no exposure certification).
4. After the Illini truck parks at the high bay door, confirm wheel chocks are in place in front of the right and left rear tires and that the truck hose connection is inside the building and all hoses, connections, and transfers are completely under cover.
5. Inspect the trucks capacity to confirm it is adequate for the planned transfer.
6. Identify the controls for the pump and understand how to stop the pump in case of emergency. Examine the hoses to confirm they are absent of chafing or obvious holes.
7. Give the go ahead for the Illini operator to initiate the transfer.
8. Observe the transfer until complete. While the Illini operator prepares the truck for transport, inspect the oil transfer area to confirm the absence of spilled oil.

9. When truck is ready to depart, remove chocks. After the truck has left the area, observe the area to confirm the absence of spilled material.

In the event of a spill at T-2, follow the procedures in Section 7.4 (duplicated in Appendix A).

7.15.4 Emergency Generator Diesel Tank Transfer Procedure

1. Killark Personnel are present during all diesel deliveries and remain in the area proximate to the transfer until the truck leaves the facility.
2. The spill kit closest to the diesel AST is inventoried monthly by Killark employees based on a list inside the kit. Killark Personnel checks the inspection log prior to initiating the transfer.
3. Prior to initiating the transfer, confirm wheel chocks are in place in front of the right and left rear tires.
4. Inspect the AST capacity to confirm it is adequate for the planned transfer.
5. Identify the controls for the pump and understand how to stop the pump in case of emergency. Examine the hoses to confirm they are absent of chafing or obvious holes.
6. Give the go ahead for the delivery operator to initiate the transfer.
7. Observe the transfer until complete. While the operator prepares the truck for transport, inspect the oil transfer area to confirm the absence of spilled oil.
8. When truck is ready to depart, remove chocks. After the truck has left the area, observe the area to confirm the absence of spilled material.

In the event of a spill at T-3, follow the procedures in Section 7.4 (duplicated in Appendix A).

7.16 Field Constructed Aboveground Storage Tanks [40 CFR 112.7(i)]

There are no field-constructed aboveground oil storage tanks at this facility.

7.17 Conformance with Applicable Standards [40 CFR 112.7(j)]

This SPCC Plan is in conformance with all applicable requirements of 40 CFR Part 112 as discussed in this plan. In addition to the applicable requirements under 40 CFR Part 112, the State of Missouri requires more stringent requirements for preventing, controlling, and/or reporting oil product spills or discharges as follows:

10 CSR 26-5.020 Reporting Releases and Suspected Releases. Unless otherwise provided in this rule, owners and operators of aboveground storage tanks (ASTs) shall report any suspected or confirmed release of a regulated substance to the Department of Natural Resources' Emergency Spill Line at (573) 634-2436 at the earliest practical moment within twenty-four (24) hours of discovery of the suspected or confirmed release. Immediately upon discovery or observation of regulated substances on the ground surface or in groundwater, surface water, or subsurface soils, the owner or operator shall complete the following:

The initial release response measures described in section (7) of this rule are as follows:

- Section (7) Initial Release Response Measure. Owners or operators of ASTs shall:
  - Remove as much of the regulated substance from the AST as is necessary to prevent further release to the environment;
  - Visually inspect any released substances and prevent further migration of the release into surrounding soils and groundwater;
  - Monitor and mitigate any environmental hazards posed by vapors of free product that have migrated from the AST site and entered subsurface structures utility conduits or trenches;
  - Remedy hazards posed by excavated or exposed contaminated soils that result from initial release response activities. Any treatment or disposal of contaminated soils shall be in compliance with applicable state and local requirements;
  - Collect and analyze at least one (1) soil or groundwater sample as necessary to establish the presence of contamination. The sample(s) must be collected in a location where contamination is most likely to be present at the AST site. In selecting the location of the sample(s), the owner or operator shall consider the nature of the stored substance, the type of backfill around the release if outside the secondary containment, or the secondary containment if the secondary containment is not constructed of impermeable material, depth to groundwater, and all other factors appropriate for identifying the presence and source of the release; and
  - Investigate the site to determine whether free product is present. If free product is present, then free product removal activities shall begin immediately.

These requirements have been incorporated into the applicable sections of this SPCC Plan. Any deviation from these requirements may require a revision to this SPCC Plan.

7.18 Qualified Oil-Filled Operational Equipment [40 CFR 112.7(k)]

The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in 40 CFR 112.7(k)(1) may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph 40 CFR 112.7(k)(2) in lieu of the general secondary containment required in paragraph of this section.

Qualified oil-filled operating equipment are those located at a facility that has had no single discharge as described from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve-month period in the three years prior to the SPCC Plan certification.

Killark meets the qualifying criteria, but has provided general secondary containment for all oil-filled operating equipment and does not need to utilize the alternate requirements to general secondary containment.

Section 8

Specific Requirements [40 CFR 112.8]

In accordance with 40 CFR 112.8(a), this facility meets the general requirements for an SPCC Plan listed under 40 CFR 112.7, as described in the previous sections, as well as the specific discharge prevention and containment procedures listed in 40 CFR 112.8, as described in the following sections.

8.1 Facility Drainage [40 CFR 112.8(b)]

8.1.1 Diked Oil Storage Areas [112.8(b)(1) – (b)(2)]

No diked outdoor oil storage is used at the site.

8.1.2 Drainage of Undiked Areas [112.8(b)(3) – (b)(4)]

Undiked areas of the facility with the potential to discharge oil are limited to the three oil transfer areas discussed in Section 7.15 and an electrical transformer. The associated areas can be isolated preventing a discharge in the event of a spill as discussed above.

8.1.3 Drainage Treatment Units [112.8(b)(5)]

There are no continuous treatment units for surface drainage waters at this facility

8.1.4 Bulk Storage Containers [40 CFR 112.8(c)]

An inventory of all oil storage tanks located at this facility, along with the type of secondary containment, is provided in Table 2 and Appendix B.

8.1.5 Container Material and Construction [112.8(c)(1)]

The material and construction of all oil storage tanks at the facility is provided in Table 2, and are compatible with the material stored and conditions of storage such as temperature and pressure.

8.1.6 Secondary Containment [112.8(c)(2)]

As described in Section 7.2.4 and Table 2 of this Plan, oil storage containers at the Facility have secondary containment systems constructed to be capable of containing oil so that any discharge does not escape the containment before cleanup occurs.

8.1.7 Drainage of Diked Areas [112.8(c)(3)]

The facility does not use diked outdoor storage.

8.1.8 Buried or Partially Buried Tanks [112.8(c)(4) – (c)(5)]

The facility is not equipped with buried or partially buried tanks.

8.1.9 Tank Testing and Inspections [112.8(c)(6)]

Each aboveground oil storage container is visually inspected regularly and formally inspected, if required, on a schedule as described in Section 7.12 of this Plan.

8.1.10 Internal Heating Coils [112.8(c)(7)]

There are no tanks with internal heating coils at this Facility.

8.1.11 Overfill Prevention [112.8(c)(8)]

The facility is equipped with two tanks used for oil storage. The diesel tank is equipped with a vent whistle and the used oil AST is equipped with an audible alarm and flashing light. Killark personnel are present and actively observe the operation.

8.1.12 Effluent Treatment Facilities [112.8(c)(9)]

There are no treatment processes for surface runoff effluent at this Facility.

8.1.13 Correction of Visible Discharges [112.8(c)(10)]

Visible discharges of oil products from oil containers, including seams, gaskets, piping, pumps, valves, rivets and bolts, are cleaned up as soon as practicable after discovery, and the cause of the discharge is identified and addressed as soon as practicable.

8.1.14 Mobile or Portable Containers [112.8(c)(11)]

The mobile or portable oil containers that are located at the facility are described in Section 7.2.4, Table 2, and appendix B. All mobile or portable oil containers are positioned to prevent a discharge and are equipped with secondary containment.

8.1.15 Facility Transfer Operations [40 CFR 112.8(d)]

8.1.15.1 Buried Oil Piping [112.8(d)(1)]

No buried oil piping is located at this facility.

8.1.15.2 Aboveground Oil Piping [112.8(d)(2) – (d)(5)]

There is no aboveground oil piping or other transfer operations at the facility that are accessible to vehicles.

Section 9

Certification of the Applicability of the Substantial Harm Criteria [40 CFR 112.20(e)]

The intent of this form is to determine if the facility for which this SPCC Plan is written must prepare a Facility Response Plan as defined by 40 CFR 112.20.

Facility Name: Killark

Facility Address: 2112 Fenton Logistics Park Blvd, Fenton Missouri

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   YES _____ NO X
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation within any above ground storage tank area?
   YES _____ NO X
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.
   YES _____ NO X
4. Does the facility have a total oil storage capacity of greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
   YES _____ NO X
5. Does the facility have a total oil storage capacity of greater than or equal to 1 million gallons and has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
   YES _____ NO X

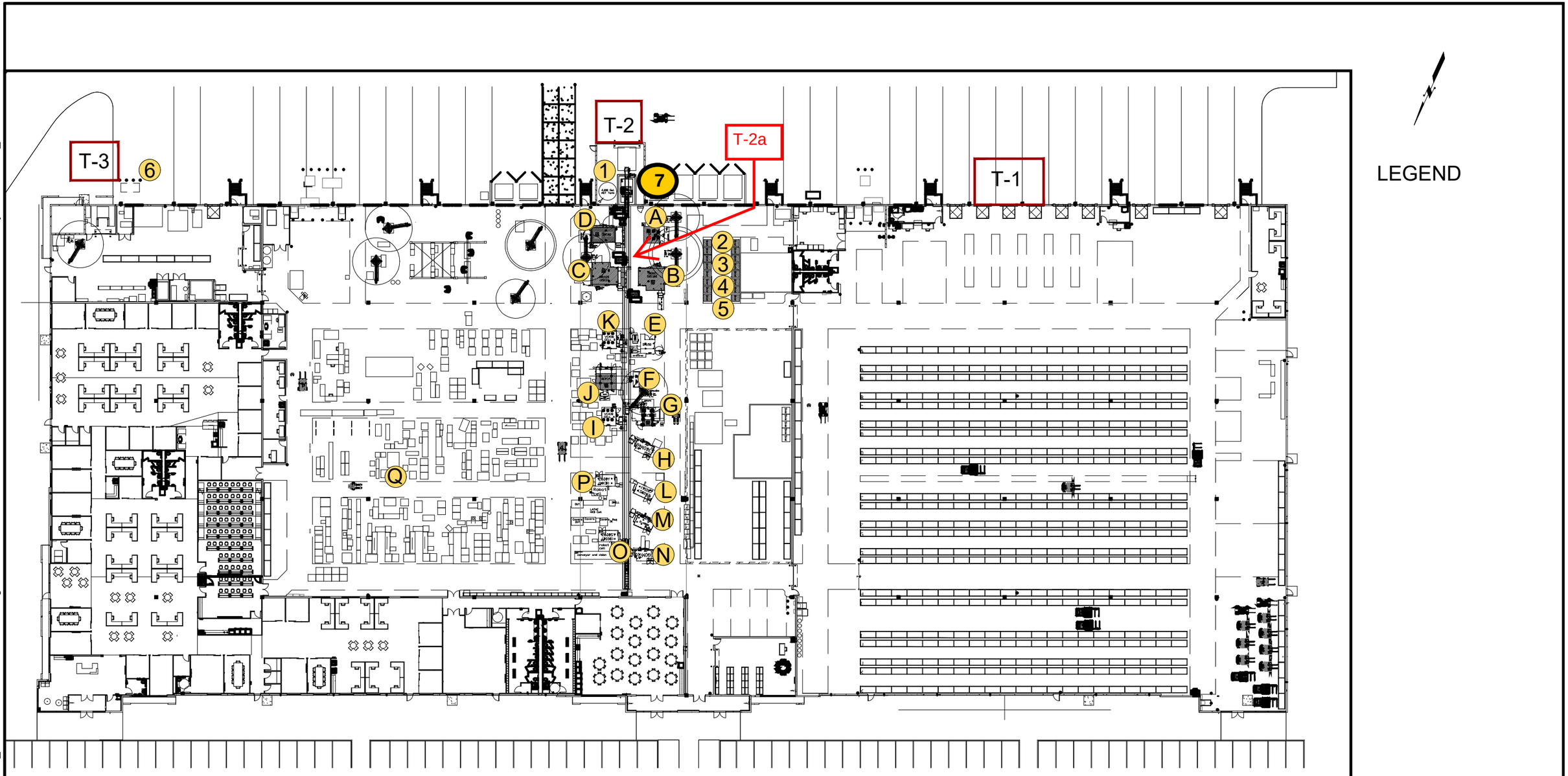
Certification

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.

Signature: _____

Name (type or print): Warren Jenkins

Title: VP & General Manger



Brown AND Caldwell

SCALE: 1" = 50'

JOB NUMBER: 151962

DATE: November 5, 2019

HUBBELL INCORPORATED, KILLARK DIVISION
2112 FENTON LOGISTICS PARK BLVD
FENTON, MISSOURI

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

FIGURE
1

Path: \\bcmilfp01\projects\Hubbell\151962_St_Louis_MO\Phase 104 Fenton Permitting\SPCC\DRAFT FENTON SPCC\CAD File Name: 151962-SITE PLAN Plot Date: November 5, 2019 8:51 AM Cadd Use

Brown AND Caldwell

SCALE: 1" = 250'
JOB NUMBER: 151962.104
DATE: November 5, 2019

HUBBELL INCORPORATED, KILLARK DIVISION
2112 FENTON LOGISTICS PARK BLVD.
FENTON, MISSOURI

SITE PLAN

FIGURE
2

Appendix A: Spill Response Procedure and Reporting Form

APPPENDIX A – SPILL RESPONSE PROCEDURE

Procedures for responding spills of fuel or oil products are provided below. Personnel shall immediately respond to spills to prevent materials from discharging off site or entering a waterway or sewer.

Spill response procedures for oils and other chemicals are also provided in Appendix A for easy access during a spill. The Facility's standard approach toward spill response is summarized below:

- Assess hazards:
  - Assess the quantity and type of substance spilled and integrity of containment, if applicable;
  - Stop affected operations if necessary and if able to do so safely;
  - Secure the area; and
  - Determine if the spill could potentially impact waterways or leave the site.
- Isolate the source by closing open valves or containers, deactivate pumps, up righting containers contributing to the spill as appropriate.
- Immediately notify the EHS Manager, who will notify others (including external reporting) as appropriate.
- Use all equipment and manpower at Facility's disposal to minimize the amount of oil spilled and to prevent it from entering any navigable waterways.
- Once the spill is stopped and contained, use absorbent materials to absorb the spilled oil. The oil-soaked material must be disposed of according to federal, state, and local regulations. (For a spill greater than 5 gallons, notify the EH&S Manager who will notify the environmental Contractor, Illini Environmental Inc. for assistance is necessary).
- If spill is reportable (See Section 7.7), the EH&S Manager will immediately notify authorities listed on Emergency Contact List at the front of this Plan.
- In the event a spill reaches a waterway, the EHS Manager will:
  - Notify the National Response Center (800-424-8802) and local and state spill response agencies;
  - Notify spill response contractor if necessary;
  - Stop the source of the spill immediately;
  - Shut down all equipment and ignition sources in the area;
  - Deploy booms, damming materials, and absorbents to contain the spill;
  - Restore habitat if necessary; and
  - Decontaminate the affected area, equipment, and surfaces that have contacted the spilled material.

SPILL REPORTING FORM

Provide to: **EPA**

1. SITE NAME, ADDRESS, AND PHONE NUMBER:

2. NAME OF PERSON DISCOVERING/REPORTING SPILL:

3. DATE AND TIME INCIDENT DISCOVERED:

4. DATE AND TIME OF INCIDENT:

5. BRIEFLY DESCRIBE INCIDENT, INCLUDING TYPE OF MATERIAL SPILLED AND EQUIPMENT/FACILITIES INVOLVED:

6. CAUSE AND SOURCE OF DISCHARGE:

7. DURATION OF SPILL:

8. SPILL WAS RELEASED TO THE FOLLOWING MEDIA:

- ☐ WATER/WATERWAYS (DESCRIBE)
- ☐ OIL WATER SEPARATOR
- ☐ STORM DRAIN
- ☐ OTHER (SPECIFY)
- ☐ SEWER
- ☐ CONCRETE/ASPHALT
- ☐ SOIL
- ☐ DRY WELL

8. AMOUNT DISCHARGED (GALLONS):

9. WAS FIRE DEPARTMENT NOTIFIED?

☐ YES ☐ NO ☐ N/A

NAMES:

10. ASSISTANCE REQUIRED FROM CONTRACTOR?

☐ NO ☐ YES (WHO & EXPLAIN):

11. NAME AND ADDRESS OF DISPOSAL CONTRACTOR USED

12. DISTANCE SPILL MATERIAL TRAVELED:

13. OFF-SITE PROPERTY AFFECTED?

☐ NO ☐ YES (EXPLAIN)

14. PERSONAL PROTECTIVE EQUIPMENT AND/OR SPILL EQUIPMENT/MATERIALS USED? ☐ NO ☐ YES (EXPLAIN)

15. ANY DAMAGES OR INJURIES?:

☐ NO ☐ YES (EXPLAIN)?

16. ACTION BEING TAKEN TO STOP, REMOVE, AND MITIGATE THE EFFECTS OF THE DISCHARGE?

17. IS AN EVACUATION NEEDED?

18. ADDITIONAL INFORMATION INCLUDING INDIVIDUALS AND ORGANIZATIONS CONTACTED (IF NECESSARY)

19. PERSON MAKING THIS REPORT:
(NAME AND TITLE):

20. SIGNATURE OF PERSON COMPLETING FORM AND DATE COMPLETED:

_____ / / .

Appendix B: Back-Up Information

- Secondary Containment Details
- Secondary Containment Capacity Calculations
- Oil Spill Spread Calculations
- Adsorbent Calculations – Minimum Requirements for Loading Dock and Used Oil Transfer Area
- Trough Details

TABLE B-1
Oil Storage Area and Secondary Containment Details

OLD Source Number	NEW NUMBER	Oil Storage Area Identification[1]	Oil Storage Description	Container Type	Container Capacity (gallons)	Maximum Number of Containers	SPCC Regulated Oil Storage Volume (gallons)	Contents	Typical Failure Mode for OFE?	Secondary Containment Method	Secondary Containment Capacity (gal)	Spill Kits Near By?	Comments
		TANK, DRUM, CONTAINER STORAGE											
1	1	Used Oil AST	Tank proximate to sump at the termination of the drag line. Access via mandoor and bay door from outside only. Access for the tanker trucks the pick up the used oil. (21 ft from the vehicle door)	AST	2000	1	2000	95% water, 5% machining fluid	NA (specific secondary containment provided)	Double walled tank	2,000	yes, one 5 gallon spill kit & one 55 gallon spill kit	
6	2	Drum storage	Closed drum on containment pallet (blue drum) In the MRO Storage/Kit Storage Area (32.6 ft away from the closest external wall)	drum	55	1	55	Cleaner	NA	medium plastic pallet	90	yes, next to grease buckets	
7	3	Drum storage	Closed drum on containment pallet (light blue drum) In the MRO Storage/Kit Storage Area (32.6 ft away from the closest external wall)	drum	55	1	55	Kroff Coolant	NA	medium plastic pallet	90	yes, next to grease buckets	
8	4	Drum storage	Closed drum with containment Pallet (dark blue) In the MRO Storage/Kit Storage Area (32.6 ft away from the closest external wall)	drum	55	1	55	Hydraulic oil	NA	medium plastic pallet	90	yes, next to grease buckets	
9	5	Drum storage	Closed drum with containment Pallet (dark blue) In the MRO Storage/Kit Storage Area (32.6 ft away from the closest external wall)	drum	55	1	55	Way oil	NA	medium plastic pallet	90	yes, next to grease buckets	
	6	Diesel Storage Tank - Emergency Generator	AST	AST	380	1	380	Diesel Fuel	NA	Double Walled Tank	380	NO	
	7	Oil Transfer Sump (within larger pit) at drag line termination. See notes.	Oil collection sump at the termination of the drag line.	Concrete Sump	68	1	68	95% water, 5% machining fluid	NA	Sump is within larger pit	3013	yes, one 5 gallon spill kit & one 55 gallon spill kit	Metal shavings generated during machining are conveyed on a drag line to a hopper at the drag line termination. The drag line sits within trough (2 feet by 2 feet) pitched toward the oil collection sump at the drag line termination. Oil drips off drag line into the trough, flows to the oil transfer sump at the drag line termination, and is pumped to the 2,000 gallon AST. The oil transfer sump is within a larger pit that provides more than 3,000 gallon secondary containment capacity (larger than the sum of all OFE capacities).
		OIL FILLED EQUIPMENT											
A	A	DMC 125 U deckel maho (2013)	oil and coolant are inside the equipment	OFE	259	1	259	hydraulic oil volume & Mixed coolant volume about 8%	5	the Facility Building		yes	
B	B	DMC 125 U duoBLOCK deckel maho (2008)	oil and coolant are inside the equipment	OFE	259	1	259	hydraulic oil volume & Mixed coolant volume about 8%	5	the Facility Building		yes	
C	C	DOOSAN VC 500	oil and coolant are inside the equipment	OFE	71	1	71	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
D	D	DMC 80 U	oil and coolant are enclosed inside the equipment	OFE	259	1	259	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
E	E	DMU 50	oil and coolant are enclosed inside the equipment	OFE	159	1	159	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
F	F	HAASS	oil is enclosed inside the equipment	OFE	8	1	8	hydraulic oil	5	the Facility Building		yes	
G	G	DMM 750	oil and coolant are enclosed inside the equipment. The waste oil that is skimmed off the top of the coolant is in an open container without a lid. See photo	OFE	106	1	106	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
H	H	300M (8)	inside the equipment, looks like there should be a lid for oil waste and coolant but none seen	OFE	53	1	53	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
I	I	VC430 cell A	oil and coolant are enclosed inside the equipment	OFE	79	1	79	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
J	J	DOOSAN 630	oil and coolant are enclosed inside the equipment	OFE	95	1	95	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
K	K	DOOSAN VC 430 cell b	oil and coolant are enclosed inside the equipment	OFE	79	1	79	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	

TABLE B-1
Oil Storage Area and Secondary Containment Details

OLD Source Number	NEW NUMBER	Oil Storage Area Identification[1]	Oil Storage Description	Container Type	Container Capacity (gallons)	Maximum Number of Containers	SPCC Regulated Oil Storage Volume (gallons)	Contents	Typical Failure Mode for OFE?	Secondary Containment Method	Secondary Containment Capacity (gal)	Spill Kits Near By?	Comments
L	L	2600SY (2016)	inside the equipment, the coolant and the waste skimmed oil do not have lids	OFE	66	1	66	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
M	M	2600Y-II	inside the equipment, the coolant and the waste skimmed oil do not have lids	OFE	66	1	66	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
N	N	300M (10)	inside the equipment, looks like there should be a lid for oil waste and coolant but none seen	OFE	53	1	53	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
O	O	2600SY (2018)	inside the equipment, the coolant and the waste skimmed oil do not have lids	OFE	66	1	66	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
P	P	2600Y (HKB)	inside the equipment, the coolant and the waste skimmed oil do not have lids	OFE	66	1	66	hydraulic oil & Mixed coolant - about 8%	5	the Facility Building		yes	
Q	Q	SICK C4000 MULIPRESS (4 poster hydraulic press)	Hydraulic oil	OFE	66	1	66	hydraulic oil	5	the Facility Building		yes	
	R	Electrical Transformer	NA, DRY Unit	OFE	0	1	NA	NA	NA	NA	NA	NA	

TOTAL ABOVEGROUND OIL STORAGE CAPACITY (gallons) **4,790**

Notes:
1. The entire containment systems presented above, including walls and floor, are capable of containing oil and are constructed so that any discharge from a primary containment system, such as a drum, will not escape the secondary containment system before cleanup occurs.

TABLE B2--Secondary Containment Calculations

	Source	Oil Storage Area	Containment Width (ft)	Containment Length (ft)	Containment Depth (ft)	Containment Volume (ft^3)	Containment Volume (gal)	Is Containment Completely Impervious and Free of Cracks?
Large Basin at drag line termination	hydraulic oil and way oil.	in a separate room with the 2000 gallon above ground storage tank	8.1	14.58	3.42	403	3,013	Yes
medium plastic pallets	drums (paint, cleaner, Kroff Coolant, Hydraulic Oil, Way Oil)	in the MRO Storage/Kit Storage Area (32.6 ft away from the closest external wall) & the paint drum next to the painting booth and exterior wall (~4.6ft from closest external wall)	3	4	1	12	90	Yes
small plastic pallet	buckets (grease)	in the MRO Storage/Kit Storage Area (32.6 ft away from the closest external wall)	2	4	0.5	4	30	Yes
large plastic pallet	drums and buckets (Empty Aerosol Cans, flange cleaner, grease)	Next to painting booth and exterior wall (~4.6ft from closest external wall)	4	6	1	24	180	Yes

TABLE B3--Oil Spread Calculations

Source	Location	Storage Type	Volume (gallons)	Typical Failure Mode for OFE? (gallons)	Volume (ft^3)	Assumed depth of spilled oil (inches)	Area at 1.5 mm depth (ft^2)	Spread radius at equilibrium depth (1.5 mm) (ft)[4]	Distance to exterior wall (ft)	Distance to Closest Exterior Door (ft)	Radius of semi circle (if stored along wall) (ft)	Is the floor surface in this area impervious and free of cracks?	Does the building floor provide sufficient Secondary Containment?	How is Secondary containment addressed?
A	DMC 125 U deckel maho (2013)	OFE	259	5	0.67	0.059	136	6.6	10.3	30	NA	yes	yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
B	DMC 125 U duoBLOCK deckel maho (2008)	OFE	259	5	0.67	0.059	136	6.6	31	40	NA	yes	yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
C	DOOSAN VC 500	OFE	71	5	0.67	0.059	136	6.6	28	28	NA	Yes	Yes (conditional based on the maintenance of the highbay door)	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
D	DMC 80 U	OFE	259	5	0.67	0.059	136	6.6	10	10	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
E	DMU 50	OFE	159	5	0.67	0.059	136	6.6	65	69	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
F	HAASS	OFE	8	5	0.67	0.059	136	6.6	84	79	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
G	DMM 750	OFE	106	5	0.67	0.059	136	6.6	100	101	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
H	300M (8)	OFE	53	5	0.67	0.059	136	6.6	121	121	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
I	VC430 cell A	OFE	79	5	0.67	0.059	136	6.6	104	1004	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
J	DOOSAN 630	OFE	95	5	0.67	0.059	136	6.6	86	86	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
K	DOOSAN VC 430 cell b	OFE	79	5	0.67	0.059	136	6.6	63	63	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
L	2600SY (2016)	OFE	66	5	0.67	0.059	136	6.6	99	99	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
M	2600Y-II	OFE	66	5	0.67	0.059	136	6.6	82	82	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
N	300M (10)	OFE	53	5	0.67	0.059	136	6.6	66	66	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
O	2600SY (2018)	OFE	66	5	0.67	0.059	136	6.6	69	80	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
P	2600Y (HKB)	OFE	66	5	0.67	0.059	136	6.6	101	104	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed
Q	SICK C4000 MULIPRESS (4 poster hydraulic press)	OFE	66	5	0.67	0.059	136	6.6	104	114	NA	yes	Yes	Based on the estimated typical failure mode spill volume and the distance to an external door, the floor surface will contain the spill until cleanup has been completed

NOTES:
1. The facility operates 2 shifts per day, five days per week
2. Where the floor surface is used for secondary containment, the floor surface is inspected during the routine inspections to confirm that the area is maintained free from cracks. For storage locations where the spread of oil is predicted to reach an exterior wall, the seam between the wall and floor must also be inspected during routing inspections.
3. The spread area is based on the equilibrium height from Spills on Flat Inclined Pavements, Table 4.5 prepared by Pacific Northwest National Laboratory for the U.S Department of Defense.
4. The spread radius is based on the typical failure mode.

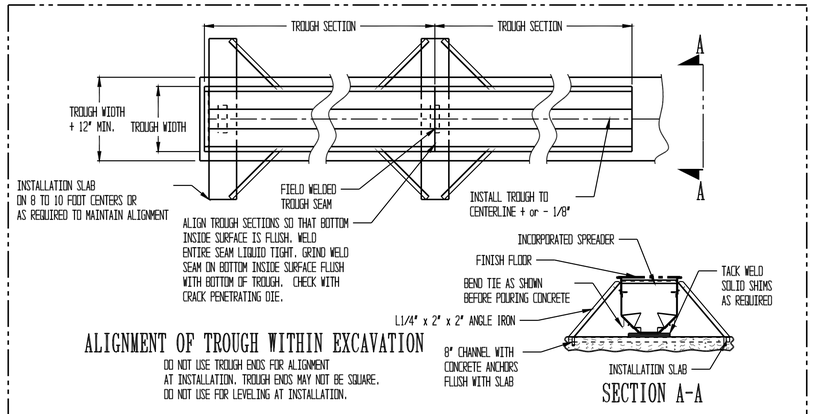
TABLE B4--Adsorbent Calculations; Minimum Requirements for Loading Dock and Used Oil Transfer Area

Product	Capacity	Most likely Spill Scenario	Necessary inventory	Units
Loose Absorbent (40 lb bag)	5 gallons per 40 lb bag	55 gallons	11	40-pound bags
Absorbent Mat (15" x 20") 100 / box	28.16 oz/pad	55 gallons	250	Pads (0.6% box)
Sorbent sock (3" x 48")	95 oz. per sock	55 gallons	74	Socks

NOTES:
1. Based on a maximum spill of 55 gallons, amounts of each sorbent needed to contain the spill is calculated above, independent to each other. For example, if loose sorbent were used with no other sorbent material to contain a spill of 55 gallons, eleven (11) 40-pound bags would be required.
2. If a combination of these will be used, the calculated necessary inventory for each type does not need to be maintained at the transfer location, provided that the combination is sufficient to contain 55 gallons. For example, if 34 socks are maintained in inventory (approx. 25 gallon sorption capacity). Five bags of loose sorbent will provide the additional capacity required to address the maximum anticipated spill.
3. The spill kit at all three transfer areas must be maintained with the minimum sorbent amount

JOB NUMBER	DATE

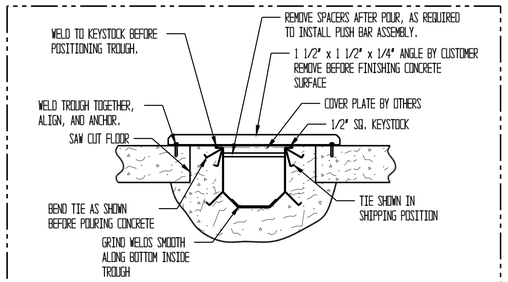
SYM	REVISION	DATE - BY
	BOTH TROUGH INSTALLATION OPTIONS PER CUSTOMER UPDATES	05-29-18 GH
	RELOCATE MACHINES PER CUSTOMER UPDATES	06-04-18 GH



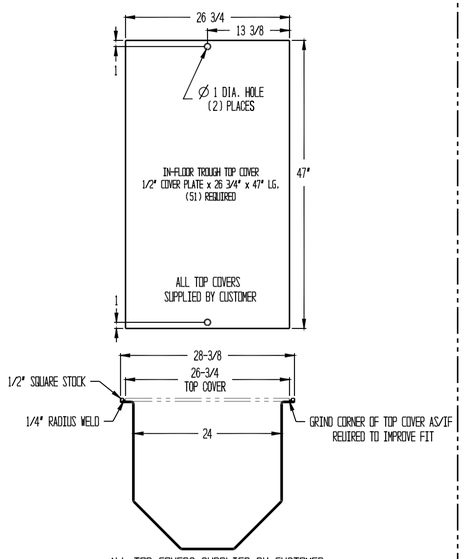
ALIGNMENT OF TROUGH WITHIN EXCAVATION

DO NOT USE TROUGH ENDS FOR ALIGNMENT AT INSTALLATION. TROUGH ENDS MAY NOT BE SQUARE. DO NOT USE FOR LEVELING AT INSTALLATION.

OPTION #1 IN-FLOOR TROUGH INSTALLATION



OPTION #2 IN-FLOOR TROUGH INSTALLATION



ALL TOP COVERS SUPPLIED BY CUSTOMER

NOTES:

A DISCONNECT, LOCKOUT POWER AND RELEASE STORED ENERGY BEFORE PERFORMING ANY MAINTENANCE.

B GUARDS, ACCESS DOORS AND COVERS MUST BE SECURELY IN PLACE BEFORE OPERATING THIS EQUIPMENT.

C ALL UNGASKETED FLANGES TO BE FILLED WITH SILICONE SEAL.

D ALL SYSTEM COMPONENTS MUST BE LEVELED, SHIMMED OR GROUTED AND ANCHORED TO GOOD CONCRETE. COMPLETE ALL FIELD CONNECTIONS, PNEUMATIC DISCHARGE ASSEMBLY AND SUPPORT AND PLUMBING BEFORE ANCHORING ANY EQUIPMENT. ANY REQUIRED LEVELING SHIMS MUST BE TACK WELDED IN PLACE.

E ELECTRICAL POWER SOURCE: 480 V, 3PH, 60HZ. CONDUIT, WIRE AND MEANS AS REQUIRED PROVIDED BY CUSTOMER OR ITS CONTRACTOR TO COMPLETE POWER DROP, TO COMPLETE AND TERMINATE ALL FIELD CONNECTIONS BETWEEN PANEL AND DEVICES, PER CUSTOMERS SPECIFICATION AND LOCAL CODE. DO NOT USE WIRE NUTS. CRIMP ON CONNECTORS REQUIRED.

F PAINT: ONE PRIME AND ONE FINISH COAT. GUARDS: NONE COLOR: NONE

G INSTALLATION BY CUSTOMER OR ITS CONTRACTOR. PROVIDE ALL LABOR, TOOLS, EQUIPMENT AND MEANS TO COMPLETE ALL MECHANICAL, ELECTRICAL, PNEUMATIC AND PLUMBING INSTALLATION, INCLUDING SITE PREPARATION, CLEANING AND TOUCH UP PAINTING PER CUSTOMERS SPECIFICATIONS AND LOCAL CODE. DO NOT DRILL MOUNTING HOLES IN EQUIPMENT FOR CONDUIT OR OTHER DEVICES, LEAKS WILL OCCUR.

H PNEUMATIC DISCHARGE PIPING AND DEVICES MUST BE SUPPORTED BY CUSTOMER OR ITS CONTRACTOR USING PIPE SADDLES WITH ROD DRCABLE HANGERS WITH DIAGONAL ANGLE IRON TYPE STABILIZING BRACING AS REQUIRED. SOME PIPING WILL REQUIRE CUT TO FIT, WELD FLANGE IN PLACE AT INSTALLATION.

I REFER TO WRITTEN PROPOSAL FOR COMPONENT DESCRIPTIONS AND SPECIFICATIONS.

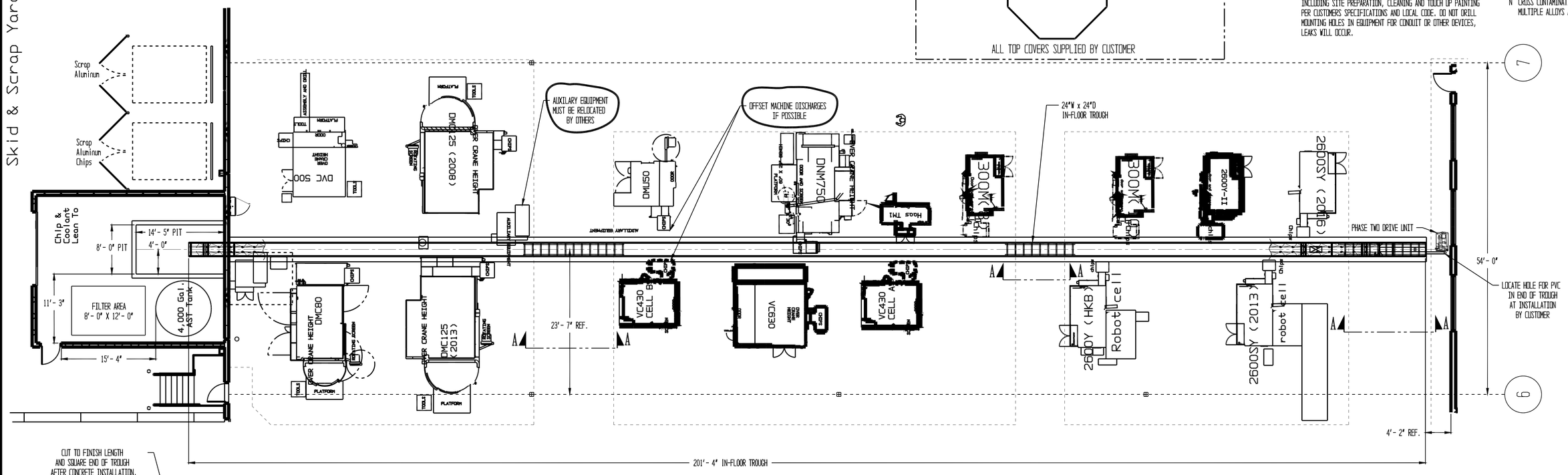
J PLUMBING TO COMPLETE FIELD CONNECTIONS INCLUDING REQUIRED SUPPORTS BY CUSTOMER OR ITS CONTRACTOR. SCHEDULE 40 BLACK PIPE OR SCHEDULE 80 PVC RECOMMENDED. MATCH PIPE DIAMETER TO COUPLING OR PUMP PORT, NEVER REDUCE. PIPE TEES OR CROSSES MUST BE USED FOR CLEAN OUT WHERE ACCESSIBLE. USE BLUE MAGIC PIPE DOPE, TEFLON TAPE NOT RECOMMENDED.

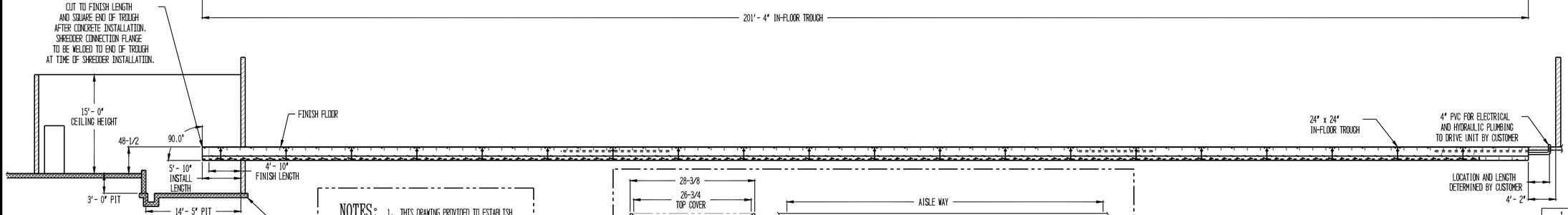
K DRY CHIP COLLECTION CONTAINERS AS WELL AS LIQUID TIGHT COLLECTION CONTAINER FOR TRAMP METAL, SLUDGE, AND RECOVERED LIQUIDS BY CUSTOMER.

L DO NOT CLIMB ON EQUIPMENT. SERVICES ACCESS PLATFORMS AND HAND RAILS BY OTHERS.

M ALL ADJUSTABLE MOUNTING FEET AND ANY BOLT TOGETHER SUPPORT STAND CONNECTIONS MUST BE STITCH WELDED AFTER ASSEMBLY AND POSITIONING TO PERMANENTLY SECURE CONNECTION.

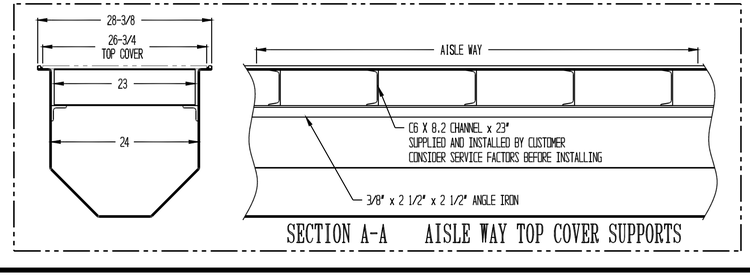
N CROSS CONTAMINATION MUST BE ANTICIPATED WHEN PROCESSING MULTIPLE ALLOYS AND/OR MULTIPLE OILS OR COOLANT COMBINATIONS.





NOTES:

1. THIS DRAWING PROVIDED TO ESTABLISH DIMENSIONAL REQUIREMENTS. ACTUAL CONSTRUCTION MUST CONFORM TO CUSTOMER SPECIFICATIONS AND LOCAL CODES.
2. HANDRAIL AND POCKET DETAIL SUPPLIED BY OTHERS.
3. COVER PLATE SUPPLIED BY OTHERS.
4. LADDER INTO PIT SUPPLIED BY OTHERS.



SECTION A-A AISLE WAY TOP COVER SUPPORTS

CUSTOMER P.O. # 4504437735

1	10455-0	24" x 24" x 201'- 4" IN-FLOOR TROUGH	1
ITEM	REF.	DESCRIPTION	QTY.

INTER-SOURCE RECOVERY SYSTEMS, INC. THE SYSTEMS APPROACH TO CHIP PROCESSING

SCALE 1/8" = 1'- 0"	JOB NUMBER 51485	DRAWN BY GH	
DATE 05-29-2018		SHEET 1	
TITLE IN-FLOOR TROUGH		MATERIAL ALU/COOL	
		REF NO 1710-2623-N1	
CUSTOMER HUBBELL - SAINT LOUIS, MO		DRAWING NUMBER 51485-000-02	

Appendix C: Tank and Facility Inspection Guidelines and Forms

TANK AND FACILITY INSPECTION GUIDELINES

The SPCC regulation requires that oil storage tanks and containers be tested or inspected on a regular schedule, in accordance with industry standards. The Steel Tank Institute (STI) developed a standard for above-ground storage tanks, including shop-fabricated and field-erected tanks up to 50,000-gallons, and portable tanks, storing stable, flammable and combustible liquids with operating temperatures between ambient and about 200 degrees F. STI Standard SP001, "Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids," combines visual inspections with formal external or internal inspections and leak testing, taking into account the size, configuration and design of the containers, as required by 40 CFR 112.8(c)(6). The January 2018 6th edition is the most recent version of this Standard. All of the oil storage containers and oil-filled equipment at this facility will be visually inspected in accordance with this Standard. No formal inspection or leak test is required based on the container classification under the standard. The inspection requirements for each oil storage container at the Facility are further described in Section 7.12 of the SPCC Plan and summarized in the table below.

Per the STI SP001 Standard, ASTs are generally considered "Category 1" tanks if they have integral secondary containment or outer containment and are not in contact with the ground. "Category 1" tanks that are less than 5,000 gallons are only required to have periodic visual inspections by a person designated by the owner, who is knowledgeable of the storage system. Periodic AST inspections do not require internal access to the ASTs nor any quantitative testing methods; the inspection is a thorough external visual inspection of the storage tank system, including its supports and foundation.

"Category 1" tanks that are over 5,000 gallons are also required to have a formal external inspection done by a certified AST inspector, every 20 years.

Records of visual inspections, as well as problems and any corrective actions taken, will be kept in Appendix C of this SPCC Plan, or in facility files, for a minimum of 3 years; it is recommended they be kept for the lifetime of the tank. Records of any formal external or internal inspections or integrity tests that may be conducted for oil or fuel storage tanks at the facility will be maintained in the facility's files.

Visual Periodic Inspections

The tanks must be visually inspected in accordance with the checklists provided on the following pages

The oil storage containers and oil-filled equipment at the facility shall be visually surveyed to discover conditions, if any, which indicate problems that could contribute to an oil leak or spill. As indicated on the inspection checklists provided on the following pages, the following inspection procedures are followed:

- For all oil and fuel storage tanks, drums and containers, inspect the containment area, tank or drum shell, supports, and foundation for structural integrity.
- Check all oil piping for dripping, loose joints, damage to supports, and pipe deflection.
- Inspect all containment pallets and containment areas for excess accumulation of water and the presence of oil. Accumulations of oil must be promptly removed.
- Inspect the area surrounding the containment areas for signs of oil spills and stained soil.
- If any deficiencies are identified, contact the EHS Manager to have it scheduled to be addressed.
- Attention should be directed to emergency shutdowns, high-level alarms, and other tank monitoring systems to verify proper operating capabilities.

If a periodic inspection reveals an issue (e.g. deformity, damage, significant corrosion) that may require inspection by a certified AST inspector, contact the EHS Manager to determine the extent of additional testing required and if the AST should remain in-service pending the inspection or replacement.

Formal External or Internal Inspections (not currently applicable)

A formal external or internal inspection means an inspection conducted by a certified inspector. A certified inspector is someone who is certified by API (American Petroleum Institute) or STI (Steel Tank Institute), or similar.

The guidelines for what need to be included in the formal external and internal inspections are outlined in Sections 7 and 8, respectively, of the STI Inspection standard. Generally, they involve a visual inspection by the certified inspector of all components of the tank to confirm everything works. The certified inspector should generate a report documenting the condition of the tank; the report may be as simple as the tank passes or does not pass.

Table 4. Tank Inspection and Testing Requirements

Tank ID, Size	AST STI Category(1)	Inspection Requirements(2)
ASTs	1, less than 1,100 / greater than 1,100 No formal external/internal inspection required	Periodic Visual Inspection by Owner: Monthly and Annual (3)
Drum Storage Areas	1, less than 1,100 No formal external/internal inspection required	Periodic Visual Inspection by Owner: Monthly and Annual (3)
Oil-Filled Equipment	1, less than 1,100 No formal external/internal inspection required	Periodic Visual Inspection by Owner: Monthly and Annual (3)

(1) Based on Section 5.0 of STI SP001, 6th Edition.
(2) Based on Table 5.5 of STI SP001, 6th Edition.
(3) See the inspection forms in Appendix C of this SPCC Plan.

Requirements for the monthly and annual inspections are provided on the following inspection forms.

MONTHLY SPCC VISUAL INSPECTION FORM

Guidance:

- This inspection is intended for monitoring the external condition of the tank/container and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector (i.e. facility employee) who is familiar with the site and can identify changes and developing problems.
- (*) designates an item in a non-conforming status; this indicates that action is required to address a problem.
- Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklist for at least 3 years.

Inspection Date/Time: _____ **Inspected by:** _____ _____

Name/Title Signature

Inspection Item		Source Area											
	1	2	3	4	5	6	7	A-D	E-K	L-P	Q		
		1.0 AST Containment/Storage Area											
1.1 Container stored only within designated storage area?	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*		
1.2 Debris, spills, or other fire hazards in containment or storage area?	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No		
1.3 Are containment systems intact (Floor free of cracks for OFE)?	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No		
		2.0 Leak Detection											
2.1 Visible signs of leakage around the container, concrete pad, containment, or ground surface?	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes No*	Yes No*	Yes No*		
		3.0 Corrosion?											
3.1 No sign of severe corrosion or damage?	Yes No*	Yes* No	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes* No	Yes* No	Yes* No		
3.2 Are all container openings properly sealed?	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*		
		4.0 Other Conditions											
4.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC Plan?	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes No*	Yes No*		
4.2 Is the floor (and exterior wall and seam) free from cracks?	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*		
4.3 Is the containment pit free from cracks?	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
		Additional Comments											

ANNUAL SPCC VISUAL INSPECTION FORM

Guidance:

- Complete this checklist on an annual basis in addition to the monthly inspections.
- This inspection is intended for monitoring the external condition of the tank/container and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector (i.e. facility employee) who is familiar with the site and can identify changes and developing problems.
- (*) designates an item in a non-conforming status; this indicates that action is required to address a problem.
- Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklist for at least 3 years.

Inspection Date/Time: _____ **Inspected by:** _____ _____

Name/Title Signature

Inspection Item	Areas to Inspect											
	1	2	3	5	6	7	A-D	E-K	L-P	Q		
	1.0 Containment											
1.1 Containment structure in satisfactory condition?	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*	Yes No*		
	2.0 Foundation and Supports											
2.1 Evidence of tank settlement or foundation washout?	Yes* No	NA	NA	NA	Yes* No	Yes* No	NA	NA	NA	NA		
2.2 Cracking or spalling of concrete pad or ring wall?	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No		
2.3 Tank supports in satisfactory condition?	Yes No*	NA	NA	NA	Yes No*	Yes No*	NA	NA	NA	NA		
2.4 Water able to drain away from tank?	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
	3.0 External Coating											
3.1 Evidence of paint failure or rust spots on the container?	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No NA	Yes* No	Yes* No	Yes* No	Yes* No		
3.2 Any other signs of potential leaks from the container?	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No	Yes* No		

Inspection Item	Areas to Inspect											
	1	2	3	5	6	7	A-D	E-K	L-P	Q		
	4.0 Level and Overfill Prevention Devices											
4.1 Does the tank liquid level sensing device operate as required?	Yes No* NA	NA	NA	NA	Yes No* NA	Yes No* NA	Yes No* NA	Yes* No NA	Yes No* NA	Yes No* NA		
	5.0 Electrical Equipment											
5.1 Is electrical wiring for control boxes/lights in good condition?	Yes No*	NA	NA	NA	Yes No*	Yes No*	Yes No*	Yes* No	Yes No*	Yes No*		
	Additional Comments											

Appendix D: Employee SPCC Training Outline and Log Sheets

Fenton, MO

Internal Training Documentation Form

Training Participant Roster

Training Title: ______________________ **Instructor:** ______________________

Start Date: ______________________ **End Date:** ______________________

Training Hours: ______________________ **Training Format:** ______________________

Employee ID	Employee	Employee Signature	Department

SPCC Employee Training Elements

Killark Division of Hubbell
Fenton, MO

The following elements are suggested topics for the employee training on the Spill Prevention, Controls and Countermeasures regulations (40 CFR 112):

- Hubbell Environmental Policy.
- Facility features and operation designed to minimize spills.
- Spill prevention and response procedures.
- Standard Operating Procedures (SOP) for spill management
- Identification of potential spill areas
    i. Loading and unloading areas.
    ii. Storage areas.
    iii. Process activities.
- Pollution control laws and regulations.
    i. Chemical spill/reportable quantity.
    ii. Duty to report.
    iii. Duty to mitigate pollution of all kinds.
- Good housekeeping and material management practices.
- The rights and duties of employees as set forth in the law.
- Pollution prevention measures.
- Inspection requirements/responsibilities.
- Reporting procedure.
- Follow-up policy.