

# **Spill Prevention, Control, and Countermeasure Plan**

**Prepared for:**



**JW Aluminum, Inc.  
435 Old Mt. Holly Road  
Goose Creek, South Carolina 29445**

**Prepared by:**

**Meridian Energy & Environment, LLC  
1876 Wallenberg Blvd.  
Charleston, SC 29407**

**September 2025**

**Revision 5**



**MERIDIAN**  
Energy & Environment, LLC

## TABLE OF CONTENTS

|                                                                                                  |           |
|--------------------------------------------------------------------------------------------------|-----------|
| <b>PART 1. PLAN ADMINISTRATION .....</b>                                                         | <b>3</b>  |
| 1.1 MANAGEMENT APPROVAL AND DESIGNATED PERSON (40 CFR 112.7) .....                               | 3         |
| 1.2 PROFESSIONAL ENGINEER CERTIFICATION (40 CFR 112.3(d)).....                                   | 4         |
| 1.3 LOCATION OF SPCC PLAN (40 CFR 112.3(e)).....                                                 | 5         |
| 1.4 PLAN REVIEW (40 CFR 112.3 AND 112.5) .....                                                   | 5         |
| 1.4.1 <i>Changes in Facility Configuration</i> .....                                             | 5         |
| 1.4.2 <i>Scheduled Plan Reviews</i> .....                                                        | 6         |
| 1.4.3 <i>Record of Plan Reviews</i> .....                                                        | 6         |
| 1.5 FACILITIES, PROCEDURES, METHODS, OR EQUIPMENT NOT YET FULLY OPERATIONAL (40 CFR 112.7) ..... | 8         |
| 1.6 CROSS-REFERENCE WITH SPCC PROVISIONS (40 CFR 112.7) .....                                    | 8         |
| <b>PART 2. GENERAL FACILITY INFORMATION .....</b>                                                | <b>11</b> |
| 2.1 FACILITY DESCRIPTION (40 CFR 112.7(a)(3)).....                                               | 11        |
| 2.1.1 <i>Location and Activities</i> .....                                                       | 11        |
| 2.1.2 <i>Oil Storage</i> .....                                                                   | 12        |
| 2.2 EVALUATION OF DISCHARGE POTENTIAL .....                                                      | 13        |
| 2.2.1 <i>Facility Drainage and Flow Paths</i> .....                                              | 13        |
| 2.2.2 <i>Discharge History</i> .....                                                             | 14        |
| <b>PART 3. DISCHARGE PREVENTION - GENERAL SPCC PROVISIONS.....</b>                               | <b>15</b> |
| 3.1 COMPLIANCE WITH APPLICABLE REQUIREMENTS (40 CFR 112.7(a)(2)) .....                           | 15        |
| 3.2 FACILITY LAYOUT DIAGRAM (40 CFR 112.7(a)(3)) .....                                           | 15        |
| 3.3 SPILL REPORTING (40 CFR 112.7(a)(4)).....                                                    | 15        |
| 3.4 POTENTIAL DISCHARGE VOLUMES AND DIRECTION OF FLOW (40 CFR 112.7(b)) .....                    | 16        |
| 3.5 CONTAINMENT AND DIVERSIONARY STRUCTURES (40 CFR 112.7(c)) .....                              | 16        |
| 3.6 PRACTICABILITY OF SECONDARY CONTAINMENT (40 CFR 112.7(d)).....                               | 17        |
| 3.7 INSPECTIONS, TESTS, AND RECORDS (40 CFR 112.7(e)) .....                                      | 17        |
| 3.7.1 <i>Preventative Maintenance</i> .....                                                      | 17        |
| 3.7.2 <i>Monthly Inspection</i> .....                                                            | 17        |
| 3.7.3 <i>Annual Inspection</i> .....                                                             | 18        |
| 3.7.4 <i>Periodic Integrity Testing</i> .....                                                    | 18        |
| 3.8 PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCEDURES (40 CFR 112.7(f))                   | 18        |
| 3.9 SECURITY (40 CFR 112.7(g)).....                                                              | 19        |
| 3.10 TANK TRUCK LOADING/UNLOADING RACK REQUIREMENTS (40 CFR 112.7(h)) .....                      | 19        |
| 3.10.1 <i>Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))</i> .....                    | 19        |

|      |                                                                                  |    |
|------|----------------------------------------------------------------------------------|----|
| 3.11 | BRITTLE FRACTURE EVALUATION (40 CFR 112.7(I)) .....                              | 21 |
| 3.12 | CONFORMANCE WITH STATE AND LOCAL APPLICABLE REQUIREMENTS (40 CFR 112.7(J)) ..... | 21 |

**PART 4. DISCHARGE PREVENTION – SPCC PROVISIONS FOR ONSHORE FACILITIES (EXCLUDING OIL PRODUCTION FACILITIES) ..... 22**

|        |                                                                              |           |
|--------|------------------------------------------------------------------------------|-----------|
| 4.1    | FACILITY DRAINAGE (40 CFR 112.8(B)) .....                                    | 22        |
| 4.2    | BULK STORAGE CONTAINERS (40 CFR 112.8(C)) .....                              | 22        |
| 4.2.1  | <i>Construction (40 CFR 112.8 (c)(1)) .....</i>                              | <i>22</i> |
| 4.2.2  | <i>Secondary Containment (40 CFR 112.8(c)(2)).....</i>                       | <i>22</i> |
| 4.2.3  | <i>Drainage of Secondary Containment Areas (40 CFR 112.8(c)(3)) .....</i>    | <i>22</i> |
| 4.2.4  | <i>Corrosion Protection (40 CFR 112.8(c)(4)).....</i>                        | <i>23</i> |
| 4.2.5  | <i>Partially Buried and Bunkered Storage Tanks (40 CFR 112.8(c)(5)).....</i> | <i>23</i> |
| 4.2.6  | <i>Inspections and Tests (40 CFR 112.8(c)(6)).....</i>                       | <i>23</i> |
| 4.2.7  | <i>Heating Coils (40 CFR 112.8(c)(7)) .....</i>                              | <i>23</i> |
| 4.2.8  | <i>Overfill Prevention Systems (40 CFR 112.8(c)(8)) .....</i>                | <i>23</i> |
| 4.2.9  | <i>Effluent Treatment Facilities (40 CFR 112.8(c)(9)).....</i>               | <i>23</i> |
| 4.2.10 | <i>Visible Discharges (40 CFR 112.8(c)(10)) .....</i>                        | <i>23</i> |
| 4.2.11 | <i>Mobile and Portable Containers (40 CFR 112.8(c)(11)).....</i>             | <i>24</i> |
| 4.3    | TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESSES (40 CFR 112.8(D)).....  | 24        |

**PART 5. DISCHARGE RESPONSE ..... 25**

|       |                                                  |           |
|-------|--------------------------------------------------|-----------|
| 5.1   | RESPONSE TO A MINOR DISCHARGE .....              | 25        |
| 5.2   | RESPONSE TO A MAJOR DISCHARGE.....               | 26        |
| 5.3   | WASTE DISPOSAL .....                             | 27        |
| 5.4   | DISCHARGE NOTIFICATION.....                      | 27        |
| 5.4.1 | <i>Reporting to EPA and DHEC.....</i>            | <i>28</i> |
| 5.4.2 | <i>Notifying Community Stakeholders.....</i>     | <i>29</i> |
| 5.5   | CLEANUP CONTRACTORS AND EQUIPMENT SUPPLIERS..... | 29        |

**Tables**

|                                     |    |
|-------------------------------------|----|
| Table 1-1: Plan Review Log          | 7  |
| Table 1-2: SPCC Cross-Reference     | 9  |
| Table 2-1: Oil Discharge History    | 14 |
| Table 3-1: Fuel Transfer Procedures | 20 |

**Appendices**

A: Site Location Map and Facility Diagrams

- B: Substantial Harm Determination
- C: Facility Inspection Checklists
- D: Record of Containment Dike Drainage
- E: Record of Discharge Prevention Briefings and Training
- F: Calculation of Secondary Containment Capacity
- G: Records of Tank Integrity and Pressure Tests
- H: Emergency Contacts
- I: Discharge Notification Form
- J: Agency Notification Standard Report
- K: Discharge Response Equipment Inventory
- L: Tank Inventory
- M: Contractor-Owned Tank Inventory

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## **INTRODUCTION**

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by JW Aluminum, Inc. (JW) to prevent oil discharges from occurring, and to prepare JW to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

This Plan has been prepared to meet the requirements of Title 40, Code of Federal Regulations, Part 112 (40 CFR part 112).

In addition to fulfilling requirements of 40 CFR Part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

JW management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix B of this Plan.

This Plan provides guidance on key actions that JW must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in Appendix C.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log included in Appendix E.
- If either of the following occurs, submit the SPCC Plan to the EPA Region 4 Regional Administrator (RA) and the South Carolina Department of Health and Environmental Control (DHEC) along with other information as detailed in Section 5.4 of this Plan:
  - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or

- The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.
- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer (PE) on the certification page in Section 1.2 of this Plan.
- Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a PE.
- Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.

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## Part 1. Plan Administration

### 1.1 Management Approval and Designated Person (40 CFR 112.7)

JW Aluminum, Inc. (JW) is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular review and amendment to the Plan. This SPCC Plan has the full approval of JW management. JW has committed the necessary resources to implement the measures described in this Plan.

The Facility Manager is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this Plan.

Facility Manager: Aderonke Akano  
General Manager

Signature:



Date:

9/8/2025

## 1.2 Professional Engineer Certification (40 CFR 112.3(d))

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the Code of Federal Regulations (40 CFR part 112) and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [40 CFR 112.3(d)]

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

Name:

Timothy M. Owens

Signature:



SC PE Registration Number:

20163

Company:

Meridian Energy & Environment, LLC

Title:

Principal

Date:

9/10/25

### **1.3 Location of SPCC Plan (40 CFR 112.3(e))**

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the facility in the environmental office. The guard shack (reception) is attended whenever the facility is operating, the office building is open 8:00 AM to 5:00 PM, 5 days per week (closed on weekends).

### **1.4 Plan Review (40 CFR 112.3 and 112.5)**

#### *1.4.1 Changes in Facility Configuration*

In accordance with 40 CFR 112.5(a), JW periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- Commissioning of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- Change in the name or contact information (i.e., phone numbers) of individuals responsible for the implementation of this plan; or
- Change in the name or contact information of spill response or cleanup contractors.

JW must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but no later than six months from the date of the amendment. The Facility Manager is responsible for initiating and coordinating revisions to the SPCC Plan.

#### *1.4.2 Scheduled Plan Reviews*

In accordance with 40 CFR 112.5(b), JW reviews this SPCC Plan at least once every five years. Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). This Revision 5 Plan is dated September 2025. The next plan review is therefore scheduled to take place on or prior to September 2030.

#### *1.4.3 Record of Plan Reviews*

Scheduled reviews and Plan amendments are recorded in the Plan Review Log (Table 1-1). This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by October 1, 2026.

**Table 1-1: Plan Review Log**

| <b>By</b>                                | <b>Date</b>    | <b>Activity</b> | <b>PE certification required?</b> | <b>Comments</b>                                                                                                                                     |
|------------------------------------------|----------------|-----------------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Jeannie Constantine                      | September 2018 | Revision 1      | Yes                               | Revised for changes in Personnel and changes in Secondary Containment Calculations                                                                  |
| Kingman Hodgkiss                         | November 2019  | Revision 2      | Yes                               | Revised for changes in tanks, assigned Personnel and changes in Secondary Containment Calculations                                                  |
| Jeannie Constantine/<br>Kingman Hodgkiss | October 2020   | Revision 3      | Yes                               | Revised for the new Boilermaker facility and to add/delete storage tanks                                                                            |
| Tim Owens                                | September 2022 | Revision 4      | Yes                               | Revised due to tank changes, removal of dismantled tanks, oil content changes, personnel changes                                                    |
| Kingman Hodgkiss                         | September 2023 | Revision 4      | No                                | Annual plan review, no revisions.                                                                                                                   |
| Kingman Hodgkiss                         | August 2024    | Revision 4      | No                                | Annual plan review, no revisions.                                                                                                                   |
| Kingman Hodgkiss                         | September 2025 | Revision 5      | Yes                               | Annual plan review. Administrative revisions to personnel and nomenclature. Added two small indoor tanks (HM-11, HM-12). Updated facility basemaps. |

\* Previous PE certifications of this Plan are summarized below.

|           |                |            |     |            |
|-----------|----------------|------------|-----|------------|
| Tim Owens | September 2018 | Revision 1 | Yes | See above. |
| Tim Owens | November 2019  | Revision 2 | Yes | See above. |
| Tim Owens | October 2020   | Revision 3 | Yes | See above. |
| Tim Owens | September 2022 | Revision 4 | Yes | See above. |

|           |                |            |     |            |
|-----------|----------------|------------|-----|------------|
| Tim Owens | September 2025 | Revision 5 | Yes | See above. |
|-----------|----------------|------------|-----|------------|

### **1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)**

There are no procedures, methods or equipment at this facility that are not yet fully operational.

### **1.6 Cross-Reference with SPCC Provisions (40 CFR 112.7)**

This SPCC Plan does not follow the exact order presented in 40 CFR Part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC rule. Table 1-2 presents a cross-reference of Plan sections relative to applicable parts of 40 CFR Part 112.

**Table 1-2: SPCC Cross-Reference**

| <b>Provision</b> | <b>Plan Section</b>                                                                 | <b>Page</b>       |
|------------------|-------------------------------------------------------------------------------------|-------------------|
| 112.3(d)         | Professional Engineer Certification                                                 | 4                 |
| 112.3(e)         | Location of SPCC Plan                                                               | 5                 |
| 112.5            | Plan Review                                                                         | 5<br>Table 1-1    |
| 112.7            | Management Approval                                                                 | 3                 |
| 112.7            | Cross-Reference with SPCC Rule                                                      | 9-10<br>Table 1-2 |
| 112.7(a)(3)      | Part 2: General Facility Information<br>Appendix A: Site Plan and Facility Diagrams | 11<br>Appendix A  |
| 112.7(a)(4)      | 5.4 Discharge Notification                                                          | 27<br>Appendix I  |
| 112.7(a)(5)      | Part 5: Discharge Response                                                          | 25                |
| 112.7(b)         | 3.4 Potential Discharge Volumes and Direction of Flow                               | 16                |
| 112.7(c)         | 3.5 Containment and Diversionary Structures                                         | 16                |
| 112.7(d)         | 3.6 Practicability of Secondary Containment                                         | 17                |
| 112.7(e)         | 3.7 Inspections, Tests, and Records                                                 | 17<br>Appendix G  |
| 112.7(f)         | 3.8 Personnel, Training and Discharge Prevention Procedures                         | 18                |
| 112.7(g)         | 3.9 Security                                                                        | 19                |
| 112.7(h)         | 3.10 Tank Truck Loading/Unloading                                                   | 19                |
| 112.7(i)         | 3.11 Brittle Fracture Evaluation                                                    | 21                |
| 112.7(j)         | 3.12 Conformance with Applicable State and Local Requirements                       | 21                |
| 112.8(b)         | 4.1 Facility Drainage                                                               | 22                |
| 112.8(c)(1)      | 4.2.1 Construction                                                                  | 22                |
| 112.8(c)(2)      | 4.2.2 Secondary Containment                                                         | 22                |

| <b>Provision</b> | <b>Plan Section</b>                                             | <b>Page</b>      |
|------------------|-----------------------------------------------------------------|------------------|
| 112.8(c)(3)      | 4.2.3 Drainage of Diked Areas                                   | 22<br>Appendix D |
| 112.8(c)(4)      | 4.2.4 Corrosion Protection                                      | 23               |
| 112.8(c)(5)      | 4.2.5 Partially Buried and Bunkered Storage Tanks               | 23               |
| 112.8(c)(6)      | 4.2.6 Inspection<br>Appendix C - Facility Inspection Checklists | 23<br>Appendix C |
| 112.8(c)(7)      | 4.2.7 Heating Coils                                             | 23               |
| 112.8(c)(8)      | 4.2.8 Overfill Prevention System                                | 23               |
| 112.8(c)(9)      | 4.2.9 Effluent Treatment Facilities                             | 23               |
| 112.8(c)(10)     | 4.2.10 Visible Discharges                                       | 23               |
| 112.8(c)(11)     | 4.2.11 Mobile and Portable Containers                           | 24               |
| 112.8(d)         | 4.3 Transfer Operations, Pumping and In-Plant Processes         | 24               |
| 112.20(e)        | Certification of Substantial Harm Determination                 | Appendix B       |

\* Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

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## Part 2. General Facility Information

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|                                    |                                                                                                           |
|------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>Name:</b>                       | JW Aluminum, Inc.                                                                                         |
| <b>Address:</b>                    | 435 Old Mt. Holly Road<br>Goose Creek, South Carolina 29445<br>(843) 572-1100                             |
| <b>Type:</b>                       | Rolling and drawing of aluminum sheet, plate and foil                                                     |
| <b>Date of Initial Operations:</b> | 1979                                                                                                      |
| <b>Owner/Operator:</b>             | JW Aluminum, Inc.                                                                                         |
| <b>Primary contact:</b>            | Kelli Tracy – Corporate Environmental Engineer<br>Work: (843) 764-8373<br>Cell (24 hours): (912) 614-5669 |

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### 2.1 Facility Description (40 CFR 112.7(a)(3))

#### 2.1.1 Location and Activities

JW Aluminum's Mt. Holly facility has been in operation since 1979 and began as Jim Walter Metals. Currently, multiple private equity firms (Kohlberg Kravis Roberts & Co., Goldman Sachs, etc) share ownership of JW Aluminum, Inc. The Mt. Holly facility manufactures specialty flat-rolled aluminum products including "fin stock" used by the heating and cooling industry; light gauge converter foil for the flexible packaging industry; heavier gauge bare and coated aluminum sheet for the fin industry; and other aluminum foil and sheet products.

JW Aluminum, Inc. is located at 435 Old Mt. Holly Road, Goose Creek, 29445 in Berkeley County, South Carolina. The city of Goose Creek is the nearest population center to the facility. The Site Location and Site Plan are included in Appendix A of this Plan show the location and layout of the facility. The Facility Diagrams (Figures A-2 through A-6) show the location of oil containers, buildings, loading/unloading and transfer areas, and critical spill control structures.

Prime and scrap aluminum is melted in natural gas fired furnaces. Molten metal is then transferred to holding furnaces before being directed to the hot mill where the molten material is formed into continuous coil of aluminum sheet. The aluminum hot mill uses

an oil emulsion spray which is recirculated by sumps under the hot mill and collected/filtered through a series of emulsion transfer tanks and storage in various stages of purity. The coils are then moved to rolling mills where the thickness or gauge of the aluminum sheet is reduced to meet customer specifications. During the rolling process, oil is applied to the sheet for lubrication. The rolling oil (Lubrilam) is re-circulated through one of three oil pits. After the rolling mills, aluminum sheet coils are sent to annealing furnaces. Following annealing, sheet coils may be sent through one of three slitters for sheet width sizing. The sheet coils can then be directed to tension levelers. After this, the product is sent to packaging and shipping.

JW Aluminum has three maintenance shops: the roll shop for boilermaker (hot mill), the roll shop for legacy (cold mills) and the fork truck shop.

Dirty oil from the rolling mills is filtered and distilled at the tank farm. Nonrecyclable oil is stored on site and disposed of properly utilizing an outside contractor. In addition to the oil stream, JW Aluminum disposes of wastewater utilizing an outside contractor.

#### *2.1.2 Oil Storage*

There are several types of oils/oily material used and/or stored at the facility, including:

- a. Lubrilam oil applied to coils during rolling mill operations for lubrication;
- b. Emulsion oil used in the hot mill;
- c. Diesel fuel used for generators, equipment and fire pumps;
- d. Hydraulic oil used in process equipment;
- e. Molybdenum grease, lithium grease and various others;
- f. Dielectric mineral oil contained in electrical transformers;
- g. Mineral oil used in slitter operations; and
- h. Oily wastewater.

An inventory of the tanks and tank contents at the facility that are regulated under this SPCC plan is included in Appendix L. All containers with capacity of 55 gallons or more are included.

As part of various construction/maintenance activities, additional tanks may be present at JW Aluminum's Mount Holly Facility. These tanks may be owned and operated by other parties. JW Aluminum has chosen to maintain a listing of these items within this SPCC plan, presented in Appendix M, but is not inspecting these tanks.

## 2.2 Evaluation of Discharge Potential

### 2.2.1 Facility Drainage and Flow Paths

Facility drainage patterns and drainage basin boundaries are shown on the Facility Diagrams (Figures A-2 through A-6). The property slopes from the south toward the north and is divided into seven drainage basins. Drainage Basins A and C are each equipped with a 100-year, 24-hour storm water retention/detention area, respectively. Each outfall discharges into the Old Mt. Holly Road drainage conveyance. From the roadside ditch, storm water from the facility enters an unnamed tributary traveling north to Laurel Swamp and Canterhill Swamp. The swamp area then leads to the Back River, located approximately 4.5 miles to the east of the facility, and the Back River feeds into the Cooper River.

Drainage Basin A is approximately 7.98 acres and consists of the western edge of the facility leading to Outfall A. Basin A contains portions of the new melting building and the new hot mill building. Drainage is routed to the west via underground culverts, and then to the north along the edge of the facility in an open channel. Basin A is equipped with a dry stormwater retention area. The outfall discharges into the Old Mt. Holly Road drainage conveyance.

Drainage Basin B is approximately 6.63 acres and consists of the northern portion of the plant, including manufacturing buildings, storage, maintenance shops, and parking areas.

Drainage Basin C is approximately 23.39 acres and consists of the southeastern portion of the site. Drainage is collected in catch basins and routed in culverts to ponds C1 and C2 to the east. Basin C contains the scrap storage yard, manufacturing buildings, receiving, and the tank farm. The outfall discharges into the Old Mt. Holly Road drainage conveyance.

Drainage Basin D is approximately 0.39 acres and consists of the wooded buffer between the facility and Walkers Lane.

Drainage Basin E is approximately 0.78 acres and consists of the wooded buffer to the southwest of the facility.

Drainage Basin F is approximately 5.34 acres and consists of the drainage from the southeast portion of the site, around pond C2.

Drainage Basin G is approximately 4.42 acres and consists of facility parking and a dry stormwater retention pond.

Secondary containment capacities for the bulk storage tanks is provided in Appendix F. All bulk oil storage tanks and oil filled equipment are identified in Appendix L.

### 2.2.2 Discharge History

Table 2-1 summarizes the facility's discharge history.

**Table 2-1: Oil Discharge History**

| Description of Discharge | Corrective Actions Taken | Plan for Preventing Recurrence |
|--------------------------|--------------------------|--------------------------------|
| None to date             |                          |                                |
|                          |                          |                                |
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## **Discharge Prevention - General SPCC Provisions**

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

### **3.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))**

Tanks and drums are inspected regularly with a schedule in accordance with the Steel Tank Institute (STI) SP-001 tank inspection standard as described in this Plan. Properly trained personnel monitor tank truck loading/unloading activities at the Tank Farms.

All Aboveground Storage Tanks (AST) currently in operation by JW Aluminum are located on concrete pads with concrete dikes or curbing with sloped areas, trench drains and sumps sufficient to store the contents of the largest tank plus enough freeboard for the 25-year, 24-hour precipitation event (7.5" per South Carolina State Climatology Office for Berkeley County). Secondary containment calculations are provided in Appendix F. Spill kits are also used to contain material spilled in the yard or inside the buildings.

Any leakage from a primary container would be detected through visual observation performed on a monthly basis. Any leak would be contained and readily detected by facility personnel before a discharge to navigable waters or adjoining shorelines could occur. Corrosion poses minimal risk of failure since drums are single-use and remain on site for a relatively short period of time (less than one year). The drum storage areas are inspected monthly. This is in accordance with accepted industry practice for drum storage and provides an effective means of verifying container integrity, as noted by EPA in the preamble to the SPCC rule at 67 FR 47120.

### **3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))**

Figure A-1 in Appendix A shows the general location of the facility on a U.S. Geological Survey topographic map. Also shown on Figures A-2 through A-6 in Appendix A is the layout of the facility and the location of storage tanks and drums. The diagrams also show the location of storm water drain inlets and the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the facility diagrams indicate the location and content of ASTs, USTs, and transfer stations and connecting piping.

### **3.3 Spill Reporting (40 CFR 112.7(a)(4))**

The discharge notification form included in Appendix I will be completed upon immediate detection of a discharge and prior to reporting a spill to the proper notification contacts.

### 3.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Appendix L presents expected volumes, discharge rates, general directions of flow in the event of equipment failure and means of secondary containment for different parts of the facility where oil is stored, used, or handled.

### 3.5 Containment and Diversionary Structures (40 CFR 112.7(c))

Methods of secondary containment at this facility include a combination of structures (e.g., built-in secondary containment and indoor storage), and land-based spill response (e.g., sorbents) to prevent oil from reaching navigable waters and adjoining shorelines:

- For bulk storage containers (refer to Section 4.2.2 of this Plan):
  - **Secondary Containment.** Some of the tanks detailed in Table 3-1 of this plan are located within secondary containment areas built with impervious materials and designed to contain the volume of the largest tank and precipitation. In some cases, the building serves as secondary containment for indoor tanks with its concrete floor and floor area sufficient to contain a spill.
  - **Drum Storage.** Drums are stored on spill pallets or inside the maintenance shop and spills are expected to remain inside the building based on storage locations. These containers are also not exposed to precipitation.
- In transfer areas and other parts of the facility where a discharge could occur:
  - **Sorbent material.** Spill cleanup kits that include absorbent material are strategically located throughout the facility as shown on Figures A-2 through A-6. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur. The response equipment inventory for the facility is listed in Appendix K of this Plan. The inventory is checked monthly to ensure that used material is replenished.
  - **Drainage system.** The majority of site drainage from industrial areas ultimately goes to the stormwater detention ponds C1 and C2. The dry stormwater pond A1 collects from the western perimeter, which has two oil water separators in the stormwater ditch directed to dry stormwater pond A1 and an oil water separator at the inlet to the dry pond. In accordance with the EPA document *SPCC Guidance for Regional Inspectors* and 40 CFR 112.8(b), 112.9(b) or 112.12(b),

these oil water separators are part of the facility drainage system and are not used for general secondary containment or sized secondary requirements for bulk storage containers as described in 112.8(c)(2), 112.8(c)(11), 112.12(c)(2) or 112.12(c)(11). Further, they do not count toward the overall storage capacity at the facility.

### 3.6 Practicability of Secondary Containment (40 CFR 112.7(d))

JW Aluminum management has determined that (active) secondary containment is practicable at this facility for the ASTs located outside.

### 3.7 Inspections, Tests, and Records (40 CFR 112.7(e))

As required by the SPCC rule, JW performs the inspections, tests, and evaluations listed in the following table. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the facility (e.g., Section 4.2.6 for bulk storage containers).

**Table 3-3: Inspection and Testing Program**

| Facility Component                           | Action                     | Frequency/Circumstances                                                              |
|----------------------------------------------|----------------------------|--------------------------------------------------------------------------------------|
| AST                                          | Visual Inspection          | Following a regular schedule and whenever material repairs are made. See Appendix L. |
| AST with capacity of 5,000 to 50,000 gallons | Formal External Inspection | Performed by a certified inspector every 20 years. See Appendix L.                   |
| Drums                                        | Visual Inspection          | Following a regular schedule and whenever material repairs are made. See Appendix L. |

#### 3.7.1 Preventative Maintenance

JW performs preventative maintenance of all equipment on a regularly scheduled basis.

#### 3.7.2 Monthly Inspection

The checklists provided in Appendix C are used for monthly inspections by JW personnel or their contracted representative. The monthly inspections cover the following key elements:

- Observing the exterior of the aboveground storage tanks for signs of deterioration, leaks, corrosion, and thinning.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Checking the inventory of discharge response equipment and restocking as needed.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Facility Manager. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written monthly inspection records are signed by the Facility Manager or their designee and maintained with this SPCC Plan for a period of three years.

#### *3.7.3 Annual Inspection*

Facility personnel or a contracted representative performs a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and is performed in Q2 of each year using the checklist provided in Appendix C of this Plan.

Written annual inspection records are signed by the Facility Manager or their designee and are maintained with this SPCC Plan for a period of three years.

#### *3.7.4 Periodic Integrity Testing*

Due to the size and category of the containers with oil at the facility, only monthly inspections by the owner are required per the Steel Tank Institute's "SP001 Standard for The Inspection of Aboveground Storage Tanks" (STI SP001).

### **3.8 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(f))**

The Facility Manager is responsible for oil discharge prevention, control, and response preparedness activities at this facility.

JW management has instructed oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and

the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Records of the briefings and discharge prevention training are kept on the form shown in Appendix E and maintained with this SPCC Plan for a period of three years.

### **3.9 Security (40 CFR 112.7(g))**

The facility is fenced and locked after hours. All visitors must pass through the guard house before being admitted to the facility.

### **3.10 Tank Truck Loading/Unloading Rack Requirements (40 CFR 112.7(h))**

The potential for discharges during the filling of an AST from a tank truck is the responsibility of the vendor providing the fuel. However, JW is committed to ensuring the safe transfer of material to and from storage tanks. The following measures are implemented to prevent oil discharges during fuel transfer operations.

#### *3.10.1 Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))*

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation. JW ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose.

The Facility Manager or their designee supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing, approved suppliers.

Vehicle filling operations are performed by facility personnel trained in proper discharge prevention procedures. The truck driver or facility personnel remain with the vehicle at all times while fuel is being transferred. Transfer operations are performed according to the minimum procedures outlined in Table 3-1.

**Table 3-1: Fuel Transfer Procedures**

| Stage                      | Tasks                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prior to loading/unloading | <ul style="list-style-type: none"> <li><input type="checkbox"/> Visually check all hoses for leaks and wet spots.</li> <li><input type="checkbox"/> Verify that sufficient volume is available in the storage tank or truck.</li> <li><input type="checkbox"/> Lock in the closed position all drainage valves of the secondary containment structure.</li> <li><input type="checkbox"/> Secure the tank vehicle with wheel chocks and interlocks.</li> <li><input type="checkbox"/> Ensure that the vehicle's parking brakes are set.</li> <li><input type="checkbox"/> Verify proper alignment of valves and proper functioning of the pumping system.</li> <li><input type="checkbox"/> If filling a tank truck, inspect the lowermost drain and all outlets.</li> <li><input type="checkbox"/> Establish adequate bonding/grounding prior to connecting to the fuel transfer point.</li> <li><input type="checkbox"/> Turn off cell phone.</li> </ul>                                                                                                                                    |
| During loading/unloading   | <ul style="list-style-type: none"> <li><input type="checkbox"/> Driver must stay with the vehicle at all times during loading/unloading activities.</li> <li><input type="checkbox"/> Periodically inspect all systems, hoses and connections.</li> <li><input type="checkbox"/> When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves.</li> <li><input type="checkbox"/> When making a connection, shut off the vehicle engine. When transferring Class 3 materials, shut off the vehicle engine unless it is used to operate a pump.</li> <li><input type="checkbox"/> Maintain communication with the pumping and receiving stations.</li> <li><input type="checkbox"/> Monitor the liquid level in the receiving tank to prevent overflow.</li> <li><input type="checkbox"/> Monitor flow meters to determine rate of flow.</li> <li><input type="checkbox"/> When topping off the tank, reduce flow rate to prevent overflow.</li> </ul>                                                                                     |
| After loading/unloading    | <ul style="list-style-type: none"> <li><input type="checkbox"/> Make sure the transfer operation is completed.</li> <li><input type="checkbox"/> Close all tank and loading valves before disconnecting.</li> <li><input type="checkbox"/> Securely close all vehicle internal, external, and dome cover valves before disconnecting.</li> <li><input type="checkbox"/> Secure all hatches.</li> <li><input type="checkbox"/> Disconnect grounding/bonding wires.</li> <li><input type="checkbox"/> Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan.</li> <li><input type="checkbox"/> Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.</li> <li><input type="checkbox"/> Remove wheel chocks and interlocks.</li> <li><input type="checkbox"/> Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.</li> </ul> |

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### **3.11 Brittle Fracture Evaluation (40 CFR 112.7(i))**

There are no field-constructed tanks at the facility. All tanks were shop-built.

### **3.12 Conformance with State and Local Applicable Requirements (40 CFR 112.7(j))**

There are no other applicable requirements or any other effective discharge prevention and containment procedures or applicable more stringent local, state or federal laws, rules, regulations or guidelines that are required to be followed at this facility.

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## **Part 4. Discharge Prevention – SPCC Provisions for Onshore Facilities (Excluding Oil Production Facilities)**

### **4.1 Facility Drainage (40 CFR 112.8(b))**

Any potential discharge from the AST's located outside the buildings will either be restrained by the secondary containment structure surrounding the tank or be directed to one of the oil/water separators. Discharges occurring during loading/unloading operations will be restrained with spill absorbent material. In addition, all other containers of petroleum products are located in containment structures or stored inside of a building where spills will be contained by absorbent material, if necessary.

These measures provide environmental protection equivalent to ponds, lagoons, or catchment basins required under 40 CFR 112.8(b)(3) and (4), as allowed in 40 CFR 112.7(a)(2).

### **4.2 Bulk Storage Containers (40 CFR 112.8(c))**

Appendix L includes the construction, volume, and content of bulk storage containers at JW Aluminum.

#### *4.2.1 Construction (40 CFR 112.8 (c)(1))*

All bulk storage containers located at JW Aluminum are constructed of steel. The design and construction of all bulk storage containers are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions.

#### *4.2.2 Secondary Containment (40 CFR 112.8(c)(2))*

The ASTs at JW are equipped with secondary containment in the form of diked secondary containment structures or other means of containment including indoor floor area and sorbents. All other containers subject to the provisions of this plan are stored inside a building that uses a spill kit for secondary containment or outside under cover in secondary containment structures.

#### *4.2.3 Drainage of Secondary Containment Areas (40 CFR 112.8(c)(3))*

The secondary containment areas for ASTs located outside and exposed to rain are drained of any accumulated precipitation after it is verified that no hydrocarbons are present, and the dike drainage form located in Appendix D is filled out.

*4.2.4 Corrosion Protection (40 CFR 112.8(c)(4))*

This section is not applicable since there is no buried outdoor piping at the facility.

*4.2.5 Partially Buried and Bunkered Storage Tanks (40 CFR 112.8(c)(5))*

This section is not applicable since there are no partially buried or bunkered storage tanks at this facility.

*4.2.6 Inspections and Tests (40 CFR 112.8(c)(6))*

Visual inspections of the oil containers are performed monthly by facility personnel in accordance with STI SP-001. Leaks from tank seams, discharge valves and other appurtenances will be promptly corrected. Records of monthly inspections are signed by the individual performing the inspection and kept at the facility for at least three years.

*4.2.7 Heating Coils (40 CFR 112.8(c)(7))*

There are no internal heating coils on oil tanks at this facility.

*4.2.8 Overfill Prevention Systems (40 CFR 112.8(c)(8))*

Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

High liquid level pump cutoff devices are installed in the pits to stop flow at certain levels. The wastewater tanks have a direct audible signal between the tank gauge and the pumping station. Tanks in the Tank Farm are equipped with direct vision gauges.

Storage drums are not refilled, and therefore overfill prevention systems do not apply.

*4.2.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))*

This section does not apply as the facility does not have any effluent treatment facilities.

*4.2.10 Visible Discharges (40 CFR 112.8(c)(10))*

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, and bolts – are quickly corrected upon discovery.

Oil, if present on the ground, is promptly cleaned up with appropriate spill kit materials and disposed of according to the waste disposal method described in Part 5 of this Plan.

---

*4.2.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))*

Small portable oil storage containers, such as 55-gallon drums, are stored in secondary containment structures or inside the maintenance shops. Any discharged material is quickly contained and cleaned up using sorbent pads and appropriate cleaning products.

**4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))**

Transfer operations at this facility include:

- The filling of AST's from a tank truck.
- The transfer of diesel from AST's to various pieces of equipment.

All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

---

## **Part 5. Discharge Response**

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material;
- Contact the Facility Manager or his alternate;
- Contact regulatory authorities and the response organization; and
- Collect and dispose of recovered products according to regulation.

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either “minor” or “major,” depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix H. The list is also posted at prominent locations throughout the facility. A list of discharge response material kept at the facility is included in Appendix K.

### **5.1 Response to a Minor Discharge**

A “minor” discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (e.g., may involve less than 10 gallons of oil);
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water;

- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by JW personnel. The following guidelines apply:

- Immediately notify the Facility Manager.
- Under the direction of the Facility Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Facility Manager will complete the discharge notification form (Appendix I) and attach a copy to this SPCC Plan.
- If the discharge involves more than 10 gallons of oil, the Facility Manager will call the South Carolina Department of Health and Environmental Control (1-888-481-0125).

## **5.2 Response to a Major Discharge**

A “major” discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters water;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- All workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas at a safe distance from the discharge.
- If the Facility Manager is not present at the facility, the senior on-site person notifies the Facility Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge.
- The Facility Manager (or senior on-site person) must call for medical assistance if workers are injured.

- 
- The Facility Manager (or senior on-site person) must notify the Fire Department or Police Department.
  - The Facility Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in Appendix H.
  - The Facility Manager (or senior on-site person) must immediately contact the South Carolina Emergency Response Center (1-888-481-0125) and the National Response Center (1-800-424-8802).
  - The Facility Manager (or senior on-site person) must record the call on the Discharge Notification form in Appendix I and attach a copy to this SPCC Plan.
  - The Facility Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the Facility Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

### **5.3 Waste Disposal**

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler.

Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor in accordance with applicable legal requirements.

### **5.4 Discharge Notification**

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

A summary sheet is included in Appendix I to facilitate reporting. The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident

- 
- Location of the incident
  - Source and cause of the release or discharge
  - Types of material(s) released or discharged
  - Quantity of materials released or discharged
  - Danger or threat posed by the release or discharge
  - Number and types of injuries (if any)
  - Media affected or threatened by the discharge (i.e., water, land, air)
  - Weather conditions at the incident location
  - Any other information that may help emergency personnel respond to the incident

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix H and is also posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance buildings, and at the loading rack/unloading area).

#### *5.4.1 Reporting to EPA and DHEC*

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix H) whenever the facility discharges (as defined in 40 CFR 112.1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42 gallons of oil in each of two discharge incidents within a 12-month period. The following information must be submitted to the EPA Regional Administrator and to DHEC within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;

- 
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
  - Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
  - Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator and to DHEC is included in Appendix J of this Plan.

#### *5.4.2 Notifying Community Stakeholders*

JW Aluminum will disclose to affected community stakeholders the volume, type and potential impact of significant spills immediately after an incident. JW Aluminum will determine what constitutes a significant spill by considering the volume, type and impact of the spill. JW Aluminum's communications department will provide follow up disclosure of the results of remediation activities, if necessary, and prompt response to inquiries.

In addition, JW Aluminum will publicly disclose, in its annual sustainability report, updated information about significant spills, the assessment of their impacts and the mitigation actions undertaken.

### **5.5 Cleanup Contractors and Equipment Suppliers**

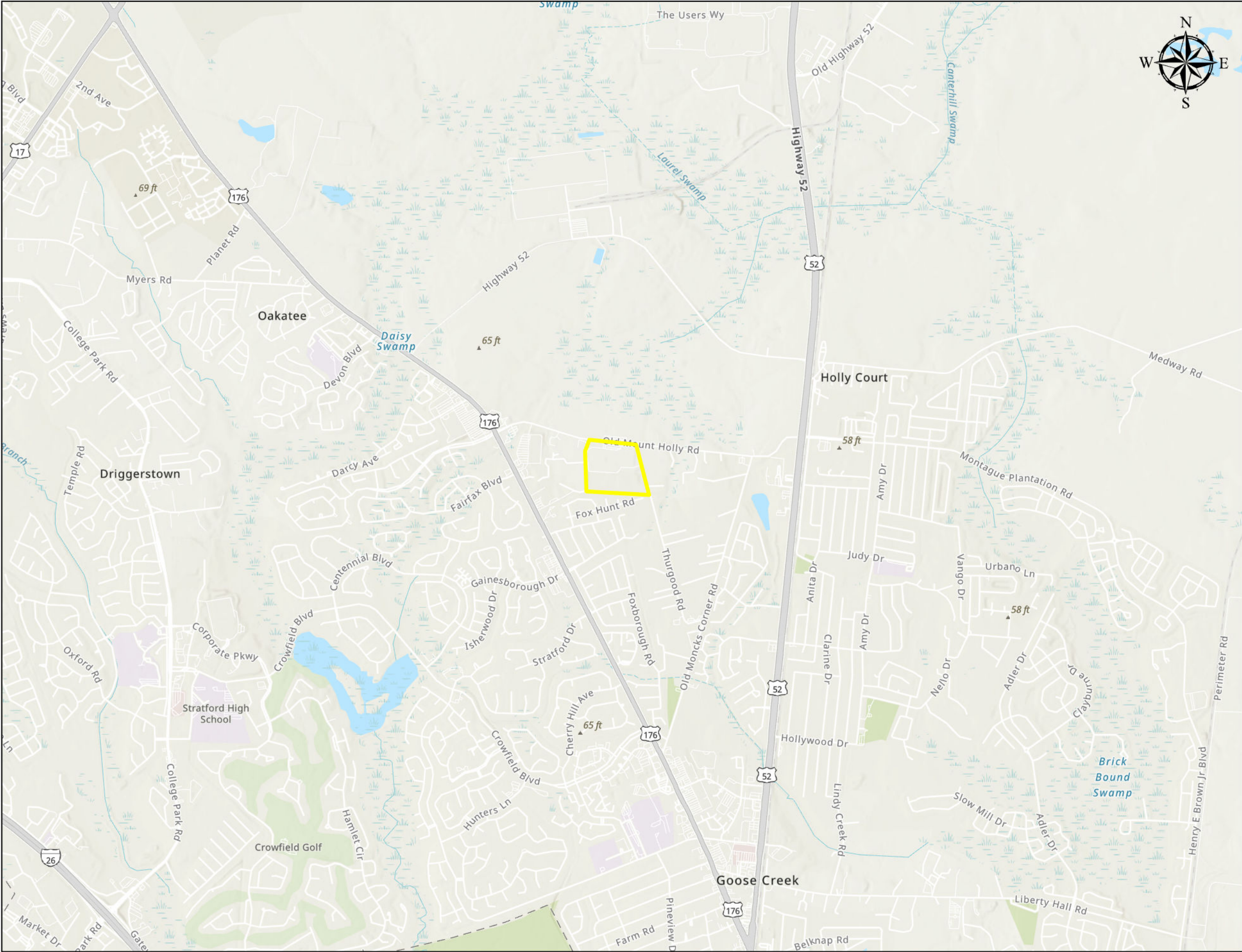
Contact information for specialized spill response and cleanup contractors are provided in Appendix H. These contractors have the necessary equipment to respond to a discharge of oil.

Spill kits are located inside the maintenance buildings. The inventory of response supplies and equipment is provided in Appendix K of this Plan. The inventory is verified monthly. Additional supplies and equipment may be ordered from the following sources:

USA Bluebook 1-800-548-1234

# **Appendix A**

## **Site Plan and Facility Diagrams**



JW Aluminum, Inc.  
Mt. Holly Facility  
Goose Creek, SC

Topographic map  
Figure A-1

Legend

Property  
Boundary

Scale 0 0.17 0.35 0.7 Miles

Notes:  
1. Size of property = 45 acres  
2. Acres exposed to industrial activity + 38 acres  
3. No significant spills or leaks within the last 3 years  
Site located within Berkley County MS4





# JW Aluminum, Inc. Mt. Holly Facility Goose Creek, SC

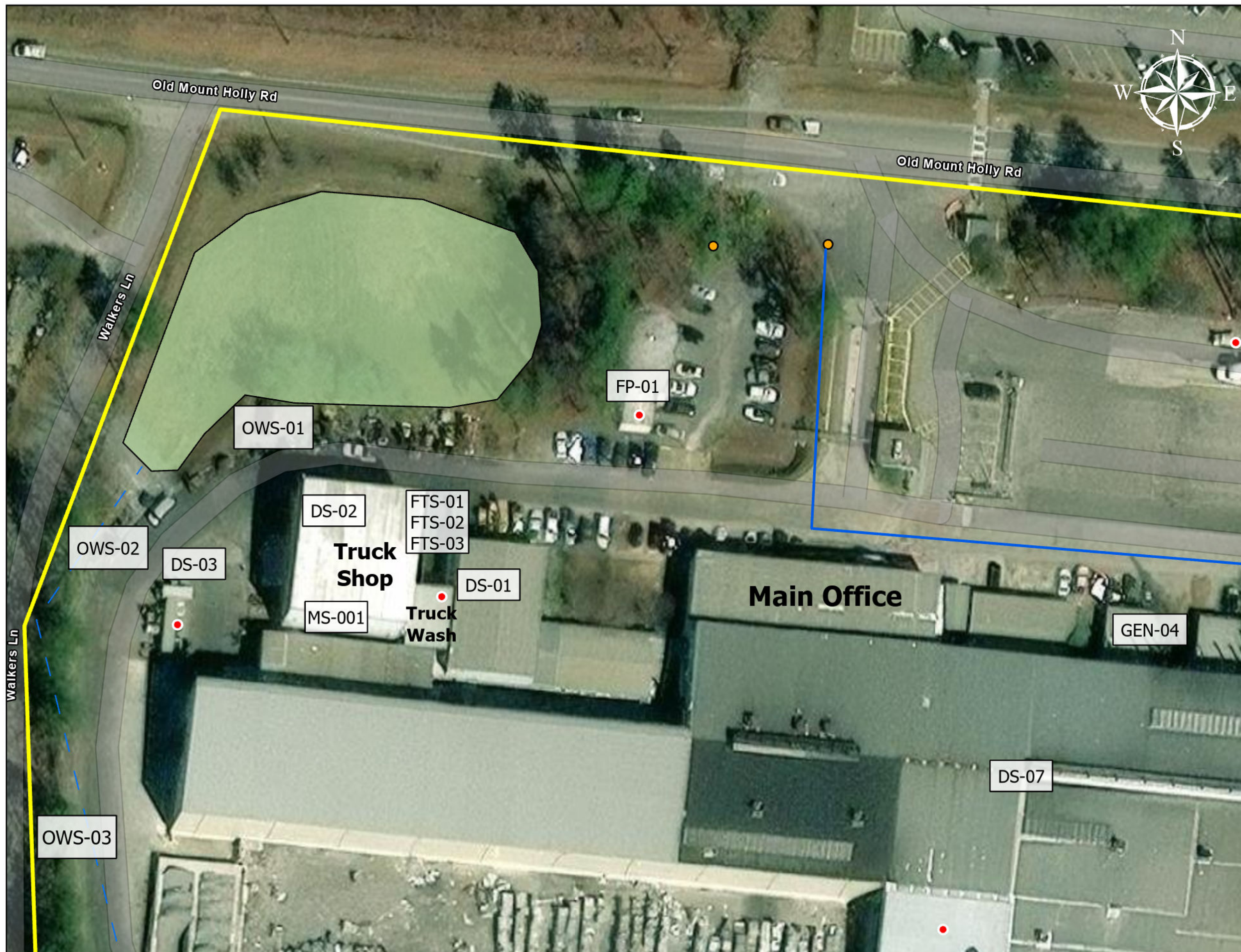
## SPCC Overview Map Figure A-2

### Legend

- |                           |                                     |
|---------------------------|-------------------------------------|
| ▲ Lime-Injected Baghouses | DB-F                                |
| ● Stormwater Outfalls     | ■ Dry Pond                          |
| ● Spill Kits              | ■ Stormwater Ponds                  |
| ■ Stormwater Drains       | ■ Property Boundary                 |
| DB-A                      | ■ Underground Stormwater Conveyance |
| DB-B                      | ■ Open Stormwater Conveyance        |
| DB-C                      | ■ Stormwater Flow Direction         |
| DB-D                      |                                     |
| DB-E                      |                                     |

Scale 0 50 100 200 US Feet

Notes:  
1. Size of property = 45 acres  
2. Acres exposed to industrial activity + 38 acres  
3. No significant spills or leaks within the last 3 years  
Site located within Berkley County MS4



JW Aluminum, Inc.  
Mt. Holly Facility  
Goose Creek, SC

SPCC NW Area Map  
Figure A-3

### Legend

- ▲ Lime-Injected Baghouses
- Spill Kits
- Stormwater Drains
- Stormwater Outfalls
- Dry Pond
- Stormwater Ponds
- Property Boundary
- Underground Stormwater Conveyance
- Open Stormwater Conveyance

Scale 0 0 0.01 0.02 Miles



JW Aluminum, Inc.  
Mt. Holly Facility  
Goose Creek, SC

SPCC SW Area Map  
Figure A-4

## Legend

- |                       |                         |
|-----------------------|-------------------------|
| ● Stormwater Outfalls | ● Spill Kits            |
| ■ Dry Pond            | ● Lime-Injected         |
| ■ Stormwater Ponds    | ▲ Baghouses             |
| ■ Property Boundary   | — Undergroun            |
| ■ Stormwater Drains   | — Stormwater Conveyance |
|                       | — Open                  |
|                       | — Stormwater Conveyance |

Scale 0 25 50 100 US Feet



JW Aluminum, Inc.  
Mt. Holly Facility  
Goose Creek, SC

SPCC Center Area Map  
Figure A-5

### Legend

- Lime-Injected Baghouses
- Spill Kits
- Stormwater Drains
- Stormwater Outfalls
- Dry Pond
- Stormwater Ponds
- Property Boundary
- Underground Stormwater Conveyance
- Open Stormwater Conveyance

Scale 0 12.5 25 50 US Feet



JW Aluminum, Inc.  
Mt. Holly Facility  
Goose Creek, SC

SPCC NE Area Map  
Figure A-6

Legend

- ▲ Lime-Injected Baghouses
- Spill Kits
- Stormwater Drains
- Stormwater Outfalls
- Dry Pond
- Stormwater Ponds
- Property Boundary
- Underground Stormwater Conveyance
- - - Open Stormwater Conveyance

Scale 0 25 50 100 US Feet

## Appendix B

### Substantial Harm Determination

Facility Name: JW Aluminum, Inc.

Facility Address: 435 Old Mount Holly Road

Goose Creek, South Carolina 29445

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 ☒

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 aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

Yes ☐

No ☒

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 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes ☐

No ☒

4. 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 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

Yes ☐

No ☒

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes ☐

No ☒

---

## 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  Title General Manager

Name Aderonke Akano Date 9/8/2025

## **APPENDIX C**

### **Facility Inspection Checklists**

The following checklists are to be used for monthly and annual facility-conducted inspections. Completed checklists must be signed by the inspector and maintained at the facility, with this SPCC Plan, for at least three years.

## Monthly Inspection Summary Checklist

This inspection record must be completed *each month* except the month in which an annual inspection is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. \*Any item that receives "yes" as an answer must be described and addressed immediately.

|                                                                         | Y* | N | Description & Comments |
|-------------------------------------------------------------------------|----|---|------------------------|
| <b>Storage tanks</b>                                                    |    |   |                        |
| <i>Tank surfaces show signs of leakage</i>                              |    |   |                        |
| <i>Tanks are damaged, rusted or deteriorated</i>                        |    |   |                        |
| <i>Bolts, rivets, or seams are damaged</i>                              |    |   |                        |
| <i>Drums show signs of leakage</i>                                      |    |   |                        |
| <i>Drums are damaged, rusted, or deteriorated</i>                       |    |   |                        |
| <i>Secondary containment needs pumping</i>                              |    |   |                        |
| <b>Response Equipment</b>                                               |    |   |                        |
| <i>Response equipment inventory is incomplete</i>                       |    |   |                        |
| <i>Water Treatment Room drain cover is missing or needs replacement</i> |    |   |                        |

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

## Annual Facility Inspection Summary Checklist

This inspection record must be completed *each year*. If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. \*Any item that receives "yes" as an answer must be described and addressed immediately.

|                                                        | Y* | N | Description & Comments |
|--------------------------------------------------------|----|---|------------------------|
| <b>Storage tanks</b>                                   |    |   |                        |
| <b>AST</b>                                             |    |   |                        |
| <i>Tank surfaces show signs of leakage</i>             |    |   |                        |
| <i>Tank is damaged, rusted or deteriorated</i>         |    |   |                        |
| <i>Bolts, rivets or seams are damaged</i>              |    |   |                        |
| <i>Tank supports are deteriorated or buckled</i>       |    |   |                        |
| <i>Tank foundations have eroded or settled</i>         |    |   |                        |
| <i>Vents are obstructed</i>                            |    |   |                        |
| <b>Totes</b>                                           |    |   |                        |
| <i>Tank surfaces show signs of leakage</i>             |    |   |                        |
| <i>Tank is damaged, rusted, or deteriorated</i>        |    |   |                        |
| <i>Bolts, rivets, or seams are damaged</i>             |    |   |                        |
| <i>Tank supports are deteriorated or buckled</i>       |    |   |                        |
| <i>Tank foundations have eroded or settled</i>         |    |   |                        |
| <i>Vents are obstructed</i>                            |    |   |                        |
| <b>Small Storage Containers</b>                        |    |   |                        |
| <i>Surfaces show signs of leakage</i>                  |    |   |                        |
| <i>Containers are damaged, rusted, or deteriorated</i> |    |   |                        |
| <i>Bolts, rivets, or seams are damaged</i>             |    |   |                        |
| <b>Response equipment</b>                              |    |   |                        |
| <i>Response equipment inventory is incomplete</i>      |    |   |                        |

Annual reminders:

- Hold SPCC Briefing for all oil-handling personnel (and update briefing log in the Plan);
- Check contact information for key employees and response/cleanup contractors and update them in the Plan as needed

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

## APPENDIX D

### Record of Containment Dike Drainage

This record must be completed when rainwater from diked areas is drained into a storm drain or into an open watercourse, lake, or pond, and bypasses the water treatment system. The bypass valve must normally be sealed in the closed position. It must be opened and resealed following drainage under responsible supervision.

Tank ID: \_\_\_\_\_

| Date | Diked Area | Presence of Oil | Time Started | Time Finished | Signature |
|------|------------|-----------------|--------------|---------------|-----------|
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |
|      |            |                 |              |               |           |

**Please Note: This log is for documenting visual observations of the water in the containment area. Water can only be discharged if it is clear with no evidence of a sheen, or contaminants of any kind. If a sheen, floating layer or other signs of pollutants are evident, the water MUST be pumped out by a licensed waste hauler.**

---

## **APPENDIX E**

### **Record of Annual Discharge Prevention Briefings and Training**

Date: \_\_\_\_\_

Trainer: \_\_\_\_\_

Topics covered in SPCC training:

- Recordkeeping
- Preventative maintenance
- Good housekeeping procedures
- Visual inspections
- Share concerns about safety measures
- Spill prevention and response
- Proper handling (collection, storage, and disposal) of used oil and fueling procedures.
- Discuss known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices

| <b>Printed Name of Employee</b> | <b>Employee Signature</b> |
|---------------------------------|---------------------------|
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |
|                                 |                           |

## APPENDIX F

### Calculation of Secondary Containment Capacity

The precipitation level corresponding to the 25-year, 24-hour rain event is 7.5" according to US Soil Conservation Service, *Technical Release 55: Urban Hydrology for Small Watersheds*, 1986.

#### Bulk Oil Storage

Secondary containment calculations are provided for the following oil-related bulk storage tanks and diked areas:

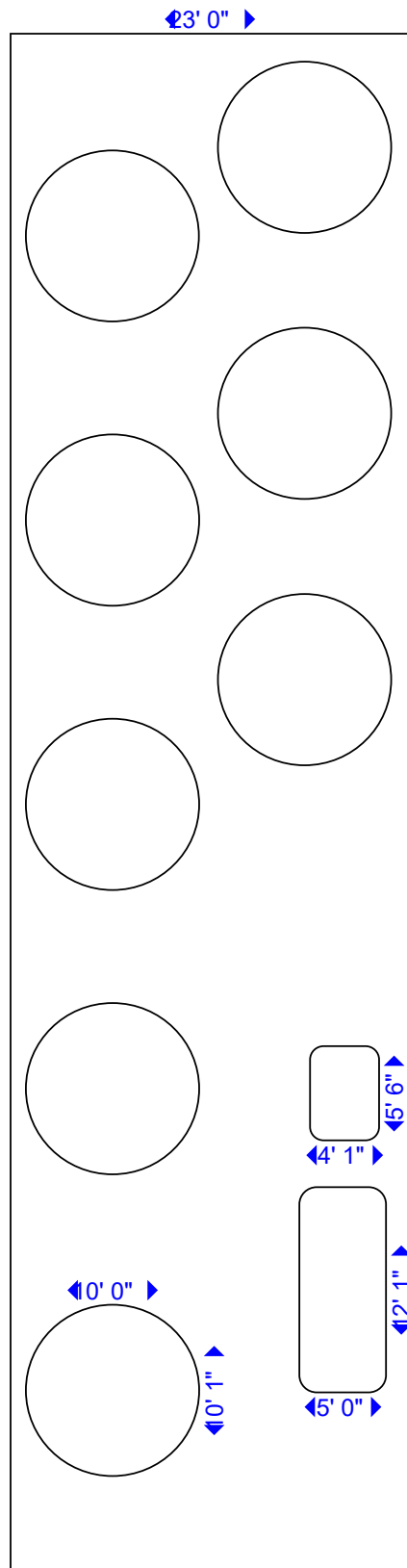
- Tank Farm 1 (TF-01 to TF-09)
- Distillation Unit in indoor diked area adjacent to Tank Farm 1 (TF-10)
- Diked Area Adjacent to Shipping/Former Coating Line (FT-01)
- Mop water tank (MP-001)
- Emergency Generator diesel tank (EG-001)
- Korean Mill Oil Room (KM-01 to KM-03, KM-05 to KM-07)
- Cold Mill oil room (CM-01 to CM-05)
- Intermediate Mill oil room (IM-01 to IM-05)
- I-Mill Fume Collection Tank (IM-06)
- Foil Mill Oil Room (FM-01 to FM-09)
- Indoor tank adjacent to coating line (FT-02)
- Diesel tank outside of fire pump house near plant entrance (FP-01)
- Hot Mill Tank Farm

The following smaller tanks and totes have secondary containment provided by Spill Kits:

- Additive Totes (KM-09 through KM-11)
- MS-001
- FTS-03
- Drum Storage Area DS-01 (In Truck Wash Area)
- Drum Storage Area DS-03 (Outside Stores/Fork Truck Shop)
- Drum Storage Area DS-04 (Boilermaker Melting)
- Drum Storage Area DS-05 (Outside I-mill in Alley)
- HM-02
- HM-03
- HM-04
- HM-11
- HM-12

**Tank Farm 1 (TF-01 to TF-09)**

Tank Farm 1 is an indoors diked area containing 8 vertical storage tanks and one horizontal tank. Seven of the vertical storage tanks and 50% of the horizontal tank occupy volume within secondary containment and this volume is subtracted from the total secondary containment. The largest tank has a volume of 15,600 gallons. The diked area has dimensions of 90' long by 23' wide by 2.4' depth. Calculations are provided on the following page.



### Tank Farm 1

**Total Containment =  $23' \times 90' \times 2.4' = 4968 \text{ ft}^3$**   
or  
**37161 gal**

#### **Interference:**

- 7 tanks with bottom in containment
- 1 5.5' x 4' metal box
- 1 5' x 12' horizontal tank with 50% of bottom in containment

#### **Tanks**

**$7' \times (3.14/4 \times (10'^2)) \times 2.4' = 1318.8 \text{ ft}^3$**   
or  
**9865 gal**

#### **Box**

**$5.5' \times 4' \times 2.4' = 52.8 \text{ ft}^3 = 395 \text{ gal}$**

#### **Horiz Tank**

**$12' \times (3.14/4 \times 5'^2) \times 50\% = 117.8 \text{ ft}^3$**   
or  
**881 gal**

**Total Interference =  $9865 + 395 + 881 = 11141 \text{ gal}$**

**Total Available Containment =  $37161 - 11141 = 26020 \text{ gal}$**

**Required Containment = Largest Tank**  
**= 15600 gal**

**Indoors so 0.0" precipitation**

**Total Available Containment > Required Containment**

**Therefore, Tank Farm 1 has sufficient  
Secondary Containment per 40 CFR 112**

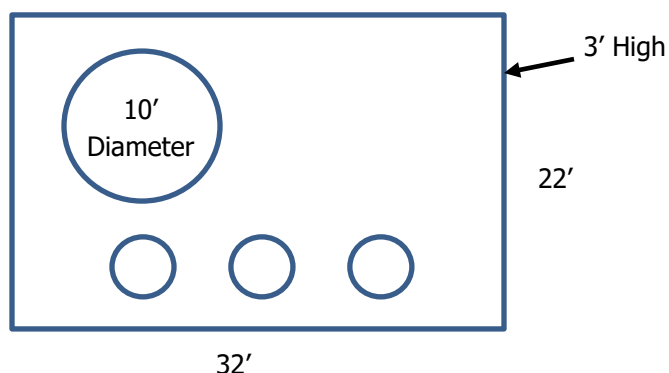
### **Distillation Unit (TF-10)**

The distillation unit (TK010) holds up to 500 gallons and is located indoors within a diked area having dimensions of 37' long by 19' wide by 1.5' depth.

Total Containment =  $(37 \times 19 \times 1.5) \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 7,888 \text{ gallons}$

Thus, this diked area has sufficient secondary containment for the distillation unit.

### **Diked Area Adjacent to Shipping/Former Coating Line (FT-01)**



The outdoor diked area adjacent to the coating line scrubber contains one vertical tank containing mineral oil. Three mist eliminators are also located within the diked area but they do not interfere with secondary containment. The largest tank has a capacity of 8,000 gallons.

Total Containment =  $(32' \times 22' \times 3') \times 7.48 \text{ gal/ft}^3 = 15,798 \text{ gallons}$

Required Containment = 8,000 gal + Precipitation

Precipitation =  $((7.5''/12) \times 32' \times 22') \times 7.48 = 3,291 \text{ gallons}$

Total Required Containment = 8,000 gal + 3,291 gal = 11,291 gallons

This diked area has sufficient secondary containment.

### **Mop Water Tank (MP-001)**

The mop water tank is located in a diked area in the alley behind the rolling mill oil rooms and has a capacity of 1,000 gallons.

$$\text{Total containment} = (10.5' \times 6' \times 3') \times 7.48 \text{ gal/ft}^3 = 1,414 \text{ gallons}$$

$$\text{Required containment} = 1,000 \text{ gallons} + 7.5''$$

$$= 1,000 \text{ gallons} + [(7.5/12) \times 10.5 \times 6] \times 7.48 = 1,295 \text{ gallons}$$

Thus, secondary containment is sufficient for this tank. Additionally, this tank is double walled.

### **Emergency Generator Diesel Tank (EG-001)**

There is a diesel tank located outdoors on the south side of the facility by the generator building over a diked area. The tank has a capacity of 500 gallons. The diked area is 12' x 5' x 1.25'.

$$\text{Total Containment} = (12' \times 5' \times 1.75') \times 7.48 \text{ gal/ft}^3 = 785 \text{ gallons}$$

$$\text{Precipitation} = [(7.5/12) \times 12' \times 5'] \times 7.48 = 280.5 \text{ gallons}$$

$$\text{Required Containment} = 500 + \text{precipitation} = 780.5 \text{ gallons}$$

The secondary containment volume is sufficient. Additionally, this tank is double walled.

### **Korean Mill Oil Room (KM-01 to KM-03, KM-05 to KM-07)**

The Korean Mill Oil Room contains six tanks plus a 20,000-gallon sump. The largest tank is 5,000 gallons so the sump provides sufficient secondary containment.

### **Cold Mill Oil Room (CM-01 to CM-05)**

The Cold Mill Oil Room contains five tanks plus a 20,000-gallon sump. The largest tank is 5,000 gallons so the sump provides sufficient secondary containment.

### **Intermediate Mill Oil Room (IM-01 to IM-05)**

The Cold Mill Oil Room contains five tanks plus a 26,000-gallon sump. The largest tank is 10,000 gallons so the sump provides sufficient secondary containment.

### **I-Mill Fume Collection Tank (IM-06)**

There is a spent rolling oil fume collection tank located outdoors in the interior wing of the alley, south of the main facility. The tank is no longer in use but still on-site. This area is covered by the facility roof. The fume collection tank has a capacity of 478.7 gallons. The I-Mill stack and the Busch Mist Eliminators are supported by concrete pillars. The concrete pillars create an obstruction of 15 feet the length of the containment basin, equivalent to roughly 25% of the containment area.

The diked area is 56.5' x 14.5' x 1'.

Total Containment =  $(56.5' \times 14.5' \times 1') \times 7.48 \text{ gal/ft}^3 = 819 \text{ gallons}$

Obstructed Containment = 819 gallons x 25% = 205 gallons

Total Available Containment = 819 gallons – 205 gallons = 614 gallons

Required Containment =  $(4' \times 4' \times 4') \times 7.48 \text{ gal/ft}^3 = 478.7 \text{ gallons}$

The secondary containment volume is sufficient.

### **Foil Mill Oil Room (FM-01 to FM-09)**

The Foil Mill Oil Room contains nine tanks. The largest tank is 5,000 gallons so the sump provides sufficient secondary containment.

### **Indoor Tank Adjacent to Coating Line (FT002)**

A 2400-gallon elevated tank is located indoors in a diked area on the east end of the Coating Line. The diked area is 8.5' x 8.5' x 3.5' and the elevated tank occupies none of the containment volume.

Total Containment =  $(8.5' \times 8' \times 4.8') \times 7.48 \text{ gal/ft}^3 = 2,441 \text{ gallons}$

Required Containment = 2,400 gallons

The secondary containment volume is sufficient.

---

### **Diesel Tank Outside Fire Pump House (FP001)**

A 300-gallon elevated tank is located outdoors adjacent to the fire pump house in a diked area. The diked area has dimensions of 3.6' x 6.4' x 2.9'.

$$\text{Total Containment} = (6.4' \times 3.6' \times 2.9') \times 7.48 \text{ gal/ft}^3 = 499.8 \text{ gal}$$

$$\text{Precipitation} = [(7.5/12) \times 6.4' \times 3.6' \times 7.48] = 107.7 \text{ gal}$$

$$\text{Required Containment} = 300 \text{ gal} + 107.7 \text{ gal} = 407.7 \text{ gal}$$

The secondary containment volume is sufficient.

### **Hot Mill Tank Farm**

$$\text{Total Containment} = A1 + A2 + A3 = 4,808.5 \text{ ft}^2$$

$$A1 = 51.0 \text{ ft} \times 26.5 \text{ ft} = 1351.5 \text{ ft}^2$$

$$A2 = 12.0 \text{ ft} \times 27.5 \text{ ft} = 330 \text{ ft}^2$$

$$A3 = 29.5 \text{ ft} \times 106.0 \text{ ft} = 3127 \text{ ft}^2$$

$$\text{Interference} = 4,808.5 \text{ ft}^2 - 3800 \text{ ft}^2 = 1008.5 \text{ ft}^2$$

$$\text{Interference Height} = 1.5 \text{ ft}$$

$$\text{Interference Volume} = 1008.5 \text{ ft}^2 \times 1.5 \text{ ft} = 1512.8 \text{ ft}^3$$

$$\text{Net Containment Volume} = 3,800 \text{ ft}^2 \times 2 \text{ ft} = 7,600 \text{ ft}^3$$

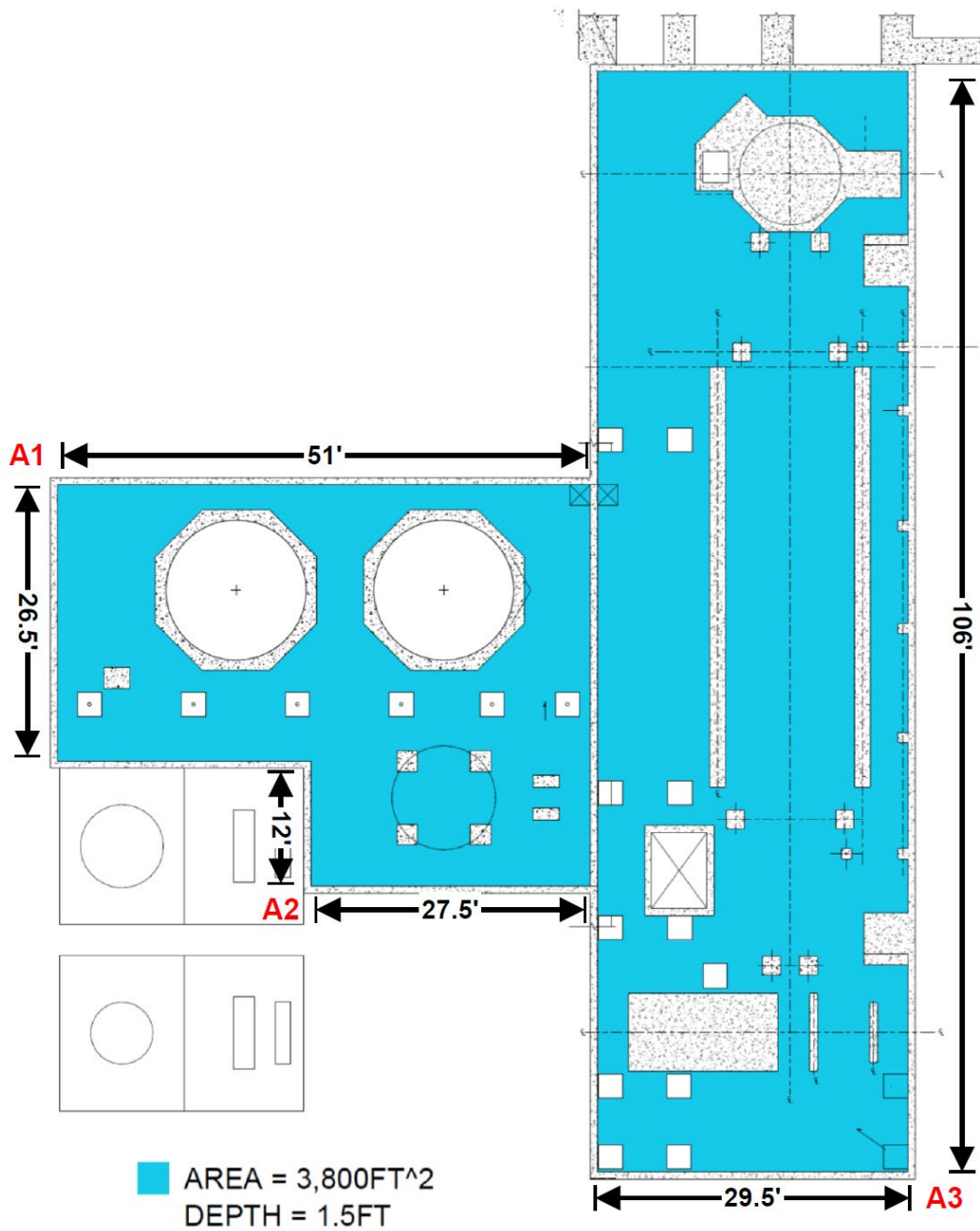
$$\text{Net Containment Volume} = 56,848 \text{ gal}$$

$$\text{Largest Tank} = 23,000 \text{ gal}$$

$$\text{Precipitation} = 4,808.5 \text{ ft}^2 \times (8/12)\text{ft} = 3,206 \text{ ft}^3 = 23,983 \text{ gal}$$

$$\text{Required Containment} = 23,000 \text{ gal} + 23,983 \text{ gal}$$

$$\text{Required Containment} = 46,983 \text{ gal}$$



---

**Sorbent Materials Required for Areas/Tanks without Dikes as Secondary Containment**

- Additive Totes (KM-09 through KM-11)
- Roll Shop Mineral Spirits tank and oil drums
- Hot Mill Roll Shop
- Drum Storage Area DS-01 (In Truck Wash Area)
- Drum Storage Area DS-04 (Boilermaker Melting)
- Drum Storage Area DS-05 (Outside I-mill in Alley)

---

## **APPENDIX G**

### **Records of Tank Integrity and Pressure Tests**

Attach copies of official records of tank integrity and pressure tests.

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## APPENDIX H

### Emergency Contacts

**Designated person responsible for spill reporting:**

**Kelli Tracy -Corporate Environmental Engineer**

**Cell (912) 614-5669**

#### EMERGENCY TELEPHONE NUMBERS:

##### Facility

|                                               |                |
|-----------------------------------------------|----------------|
| Kelli Tracy, Corporate Environmental Engineer | (843) 764-8373 |
|-----------------------------------------------|----------------|

##### Local Emergency Response

|                          |     |
|--------------------------|-----|
| Local Emergency Response | 911 |
|--------------------------|-----|

|                                     |              |
|-------------------------------------|--------------|
| City of Goose Creek Fire Department | 843-553-8350 |
|-------------------------------------|--------------|

##### Response/Cleanup Contractors

|                              |              |
|------------------------------|--------------|
| Moran Environmental Recovery | 843-767-8900 |
|------------------------------|--------------|

##### Notification

|                                 |              |
|---------------------------------|--------------|
| SCDES Emergency Response Center | 888-481-0125 |
|---------------------------------|--------------|

|                          |              |
|--------------------------|--------------|
| National Response Center | 800-424-8802 |
|--------------------------|--------------|

|                                                         |              |
|---------------------------------------------------------|--------------|
| United States Environmental Protection Agency, Region 4 | 404-562-8700 |
|---------------------------------------------------------|--------------|

## APPENDIX I

### Discharge Notification Form

#### Part A: Discharge Information

General information when reporting a spill to outside authorities:

Name: JW Aluminum, Inc.  
Address: 435 Old Mount Holly Road  
Goose Creek, South Carolina 29445  
Telephone: (843) 572-1100  
Owner/Operator: Aderonke Akano  
Primary Contact: Kelli Tracy  
Work: (843) 764-8373  
Cell (24 Hr.): (912) 614-5669

|              |                          |
|--------------|--------------------------|
| Type of oil: | Discharge Date and Time: |
|--------------|--------------------------|

|                    |                          |
|--------------------|--------------------------|
| Quantity released: | Discovery Date and Time: |
|--------------------|--------------------------|

|                                   |                     |
|-----------------------------------|---------------------|
| Quantity released to a waterbody: | Discharge Duration: |
|-----------------------------------|---------------------|

Location/Source:

Actions taken to stop, remove, and mitigate impacts of the discharge:

Affected media:

- |                                |                                                        |
|--------------------------------|--------------------------------------------------------|
| <input type="checkbox"/> air   | <input type="checkbox"/> storm water sewer/POTW        |
| <input type="checkbox"/> water | <input type="checkbox"/> dike/berm/oil-water separator |
| <input type="checkbox"/> soil  | <input type="checkbox"/> other: _____                  |

Notification person:

Telephone contact:

Business:

24-hr:

Nature of discharges, environmental/health effects, and damages:

Injuries, fatalities or evacuation required?

**Part B: Notification Checklist**

|                                                                                                     | Date and time | Name of person receiving call                                          |
|-----------------------------------------------------------------------------------------------------|---------------|------------------------------------------------------------------------|
| <b>Discharge in any amount:</b>                                                                     |               |                                                                        |
|                                                                                                     |               | Kelli Tracy, Corporate<br>Environmental Engineer<br><br>(843) 764-8373 |
| <b>Discharge in amount exceeding 10 gallons and <i>not affecting a waterbody or groundwater</i></b> |               |                                                                        |
| Local Fire Department                                                                               |               |                                                                        |
| Fire Chief                                                                                          |               |                                                                        |
| 911                                                                                                 |               |                                                                        |
| SCDES Emergency Response Center<br>(888) 481-0125                                                   |               |                                                                        |
| <b>Discharge in any amount and affecting (or threatening to affect) a waterbody</b>                 |               |                                                                        |
| Local Fire Department                                                                               |               |                                                                        |
| Fire Chief                                                                                          |               |                                                                        |
| 911                                                                                                 |               |                                                                        |
| SCDES Emergency Response Center<br>(888) 481-0125                                                   |               |                                                                        |
| National Response Center<br>(800) 424-8802                                                          |               |                                                                        |
| Clean-up Contractor                                                                                 |               |                                                                        |

## APPENDIX J

### Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to SCDES within 60 days of the qualifying discharge incident:

Division of Emergency Response, SCDES, 2600 Bull Street, Columbia, SC 29201

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| <b>Facility:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <i>JW Aluminum, Inc.</i>                               |
| <b>Owner/operator:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <i>JW Aluminum, Inc.</i>                               |
| <b>Name of person filing report:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <i>Kelli Tracy, Corporate Environmental Engineer</i>   |
| <b>Location:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <i>435 Old Mount Holly Road, Goose Creek, SC 29445</i> |
| <b>Maximum storage capacity:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <i>Approximately 300,000 gallons</i>                   |
| <b>Daily throughput:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <i>Varies</i>                                          |
| <b>Nature of qualifying incident(s):</b><br><br><input type="checkbox"/> Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons<br><br><input type="checkbox"/> Second discharge exceeding 42 gallons within a 12-month period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                        |
| <b>Description of facility (attach maps, flow diagrams, and topographical maps):</b><br><br><i>JW Aluminum manufactures specialty flat-rolled aluminum products including "fin stock" used by the heating and cooling industry; light gauge converter foil for the flexible packaging industry; and heavier gauge bare and coated aluminum sheet for the fin industry; as well as other aluminum foil and sheet products.</i><br><br><i>Prime and scrap aluminum is re-melted in one of four natural gas/ propane fired furnaces. Molten metal is then transferred to holding furnaces for degassing. At the final stage, alloy agents are added for optimal metal conditioning. Additional alloys are added in one caster and hot mill and then sent to one of three cold rolling mills, with a throughput of 250,000 gallons of rolling oil. The rolling oils (Lubrilam) are re-circulated through one of three oil pits. From the mills, aluminum sheets are sent through one of 11 annealing lines. From annealing, sheets may be sent through one of three slitters/tension levelers. At that point, the product is sent to packaging and shipping. JW Aluminum has three maintenance shops: the roll shop for boilermaker, the roll shop for legacy and the fork truck shop.</i> |                                                        |

**Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:**

**Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:**

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

**Other pertinent information:**

## APPENDIX K

### Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed.

| Spill Kit ID | Location                                              | Item                   |
|--------------|-------------------------------------------------------|------------------------|
| SK-01        | Adjacent to guard booth by outgoing shipping scale    | 55-gallon spill kit    |
| SK-02        | Inside the fire pump house                            | 55-gallon spill kit    |
| SK-03        | Inside the old roll shop                              | 55-gallon spill kit    |
| SK-04        | In the drum storage area to the west of the roll shop | 55-gallon spill kit    |
| SK-05        | Next to the hot mill tank farm                        | 55-gallon spill kit    |
| SK-06        | Hot Mill Plate Filter #2 Area                         | 55-gallon spill kit    |
| SK-07        | Hot Mill West Bay Door                                | 55-gallon spill kit    |
| SK-08        | Building South of Melting                             | 55-gallon spill kit    |
| SK-09        | In melting east of MF-6                               | 55-gallon spill kit    |
| SK-10        | Hot Mill East Entrance                                | 55-gallon spill kit    |
| SK-11        | Inside Legacy Fork Truck Maint. Shop                  | 55-gallon spill kit    |
| SK-12        | Next to receiving unloading area                      | 55-gallon spill kit    |
| SK-13        | I-Mill Oil Room                                       | 55-gallon spill kit    |
| SK-14        | Cold Mill Oil Room                                    | 55-gallon spill kit    |
| SK-15        | Next to the receiving gate on Thurgood                | 55-gallon spill kit    |
| SK-16        | WS-2 Oil Control Room, West                           | 55-gallon spill kit    |
| SK-17        | WS-2 Oil Control Room, East                           | 55-gallon spill kit    |
| SK-18        | Inside the legacy tank farm                           | 55-gallon spill kit    |
| SK-19        | South Central Hot Mill, Near Roll Grind               | 55-gallon spill kit    |
| SK-20        | WS-2 Stack Containment Area in Alley                  | 55-gallon spill kit    |
| DC-01        | Deployable Drain Cover - Hot Mill Southwest Wall      | Deployable Drain Cover |

# **APPENDIX L**

## **Tank Inventory**

MTH SPCC

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                            | CONSTRUC<br>TION<br>MATERIAL                | CONTENTS                | JW TEAMMATE<br>RESP | Type | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE            | PATH TO<br>WATER                | FILLING SOURCE            | SEC CONT | SEC CONT,<br>GAL |
|------------------------------------------------------------------------------------|--------|-----------------------------------------------------|---------------------------------------------|-------------------------|---------------------|------|---------------------|------------------------|-----------------|------------|--------------------------------|------------------------------|---------------------------------|---------------------------|----------|------------------|
|    | CM-01  | Cold Mill Oil Room, Rolling Oil Clean Tank          | Steel                                       | Rolling Oil, Clean      | Mark Smith          | Tank | Manual Visual       | 1                      | 5000            | P          | Tote/Drum Puncture             | 5000 gal in 30 minutes       | Storm water ditches to Outfalls | Totes/Drums               | Y        | 20000            |
|   | CM-02  | Cold Mill Oil Room, Rolling Oil Dirty Tank          | Steel                                       | Rolling Oil Dirty       | Mark Smith          | Tank | Manual Visual       | 1                      | 5000            | P          | Tank Failure                   | 5000 gal in 30 minutes       | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y        | 20000            |
|                                                                                    | CM-03  | Cold Mill Oil Room, Underground Concrete Lined Sump | Steel lined concrete pit in tight clay soil | Rolling Oil Dirty       | Mark Smith          | Tank | Manual Visual       | 1                      | 20000           | P, E (20)  | Tank Failure                   | 20000 gal in one hour        | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y        | 20000            |
|  | CM-04  | Cold Mill Oil Room, Filter Feed Tank                | Steel                                       | Oily Diatomaceous Earth | Mark Smith          | Tank | Manual Visual       | 1                      | 250             | P          | Tote/Drum Puncture             | Local Cleanup of oily solids | Storm water ditches to Outfalls | Manual                    | Y        | 20000            |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                                                       | CONSTRUCTION MATERIAL      | CONTENTS                                       | JW TEAMMATE RESP | Type                 | LEVEL INDICATION | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO | MAX SPILL RATE        | PATH TO WATER                   | FILLING SOURCE | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|--------------------------------------------------------------------------------|----------------------------|------------------------------------------------|------------------|----------------------|------------------|---------------------|--------------|------------|--------------------------|-----------------------|---------------------------------|----------------|----------|---------------|
|    | CM-05  | Cold Mill Oil Room                                                             | Steel                      | Rolling Oil                                    | Mark Smith       | Tank                 | Manual Visual    |                     | 1500         | P          | Tote/Drum Puncture       | 500 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums    | Y        | 20000         |
|    | CT-01  | Rolling Oil Cooling Tower                                                      | Steel                      | Rolling Oil                                    |                  | Processing Equipment | n/a              | n/a                 | n/a          | n/a        | n/a                      | n/a                   | Storm water ditches to Outfalls | n/a            | n/a      | n/a           |
|   | CT-02  | Rolling Oil Cooling Tower                                                      | Steel                      | Rolling Oil                                    |                  | Processing Equipment | n/a              | n/a                 | n/a          | n/a        | n/a                      | n/a                   | Storm water ditches to Outfalls | n/a            | n/a      | n/a           |
|  | DS-01  | Mobile equipment drum storage, Outside Fork Truck Shop next to Truck Wash Area | Metal Drums, Plastic Drums | Gear Oil, Soap, Antifreeze, Transmission Fluid | Mark Smith       | Bulk Storage (Drums) | Manual Visual    |                     | 1 Many @ 55  | P          | Puncture                 | 250 gal in 30 minutes | Storm water ditches to Outfalls | Manual         | N        | Spill Kit     |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                          | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                                                                                    | JW TEAMMATE<br>RESP | Type                       | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE        | PATH TO<br>WATER                      | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL                                  |
|------------------------------------------------------------------------------------|--------|---------------------------------------------------|------------------------------|---------------------------------------------------------------------------------------------|---------------------|----------------------------|---------------------|------------------------|-----------------|------------|--------------------------------|--------------------------|---------------------------------------|----------------|----------|---------------------------------------------------|
|    | DS-02  | Drum Dispensing Rack,<br>Inside Old Roll Shop     | Metal Drum                   | Oil                                                                                         | Mark Smith          | Drum                       | Manual Visual       |                        | 1 55            | P          | Puncture                       | 55 gal in 30<br>minutes  | Storm water<br>ditches to<br>Outfalls | Manual         | Y        | Plant Floor Area<br>Sufficient, 80<br>gallon sump |
|   | DS-03  | "Stores" Drum Storage,<br>Outside Fork Truck Shop | Metal Drum                   | New Oil, Mist,<br>Hydraulic Oil, Fire<br>Retardant, Motor Oil,<br>and Transmission<br>Fluid | Mark Smith          | Bulk<br>Storage<br>(Drums) | Manual Visual       |                        | 1 Many @<br>55  | P          | Puncture                       | 250 gal in 30<br>minutes | Storm water<br>ditches to<br>Outfalls | Manual         | N        | Spill Kit                                         |
|  | DS-05  | Alley – Drum Storage Shed<br>(outside of I-Mill)  | Metal Drum                   | Various Oils                                                                                | Mark Smith          | Bulk<br>Storage<br>(Drums) | Manual Visual       |                        | 1 20-30 @<br>55 | P          | Puncture                       | 55 gal in 30<br>minutes  | Storm water<br>ditches to<br>Outfalls |                | N        |                                                   |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                          | CONSTRUC<br>TION<br>MATERIAL | CONTENTS           | JW TEAMMATE<br>RESP | Type                       | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE     | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL            |
|------------------------------------------------------------------------------------|--------|---------------------------------------------------|------------------------------|--------------------|---------------------|----------------------------|---------------------|------------------------|-----------------|------------|--------------------------------|-----------------------|---------------------------------|----------------|----------|-----------------------------|
|    | DS-06  | Drum storage, I Mill Oil Room                     | Metal Drum                   | New Oil            | Mark Smith          | Bulk<br>Storage<br>(Drums) | Manual Visual       |                        | 1 Several @ 55  | P          | Puncture                       | 55 gal in 30 minutes  | Storm water ditches to Outfalls |                | Y        | Plant Floor Area Sufficient |
|   | DS-07  | Near Roll/ Grind Shop                             | Metal Drum                   | Various Oils       | Mark Smith          | Bulk<br>Storage<br>(Drums) | Manual Visual       |                        | 1 8 @ 55        | P          | Puncture                       | 55 gal in 30 minutes  | Storm water ditches to Outfalls |                | Y        | Plant Floor Area Sufficient |
|  | DS-08  | Misc Drum Storage, Alley Entry - Former Foil Mill | Metal Drum                   | Gear and Misc. Oil | Jason Hutto         | Bulk<br>Storage<br>(Drums) | Manual Visual       |                        | 1 Many @ 55     | P          | Puncture                       | 250 gal in 30 minutes | Storm water ditches to Outfalls | Manual         | N        | Spill Kit                   |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                                  | CONSTRUC<br>TION<br>MATERIAL | CONTENTS       | JW TEAMMATE<br>RESP | Type                 | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE     | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL                            |
|------------------------------------------------------------------------------------|--------|-----------------------------------------------------------|------------------------------|----------------|---------------------|----------------------|---------------------|------------------------|-----------------|------------|--------------------------------|-----------------------|---------------------------------|----------------|----------|---------------------------------------------|
|    | DS-09  | Drum Storag in K-Mill Oil Room, West Wall                 | Metal Drum                   | Oil            |                     | Bulk Storage (Drums) | Manual Visual       |                        | 1 2 @ 55        | P          | Puncture                       | 55 in 30 minutes      | Storm water ditches to Outfalls | Manual         | N        | Spill Kit                                   |
|   | DS-10  | Drum storage adjacent to boilermaker roll grind equipment | Metal Drum                   | Oil            |                     | Bulk Storage (Drums) | Manual Visual       |                        | 1 one @ 55      | P          | Puncture                       | 55 in 30 minutues     | Storm water ditches to Outfalls | Manual         | N        | Spill Kit                                   |
|  | EG-001 | By Generator Bldg; behind K-Mill MCC                      | Steel                        | Diesel         | Mark Smith          | Tank                 | Manual Visual       |                        | 1 500           | P          | Tank Failure                   | 500 gal in 30 minutes | Storm water ditches to Outfalls | Truck          | Y        | 785 (Walled Area)<br><br>Double Walled Tank |
|  | FM-11  | Alley Entry - Former Foil Mill                            | Steel                        | Mobilfluid 424 | Jason Hutto         | Tank                 | Manual Visual       |                        | 1 One @ 200     | P          | Puncture                       | 200 Gal in 30 minutes | Storm water ditches to Outfalls | Manual         | Y        | Plant Floor Area                            |

| Photo                                                                              | MAP ID                                                                                                          | DESCRIPTION AND LOCATION                                                                                                   | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                                                                 | JW TEAMMATE<br>RESP                   | Type                | LEVEL<br>INDICATION                                    | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED                                     | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE       | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL |
|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|------------------------------|--------------------------------------------------------------------------|---------------------------------------|---------------------|--------------------------------------------------------|------------------------|-----------------|------------------------------------------------|--------------------------------|-------------------------|---------------------------------|----------------|----------|------------------|
|    | FM-12                                                                                                           | Alley Entry - Former Foil Mill                                                                                             | Plastic                      | Waste Oil                                                                | Jason Hutto                           | Tote                | Manual Visual                                          |                        | 1 one @ 250     | P                                              | Puncture                       | 250 Gal in 30 minutes   | Storm water ditches to outfalls | Manual         | Y        | Plant Floor Area |
|    | FO-01                                                                                                           | Diesel Storage Tank, South of Boilermaker Melting Building, Installed 2021                                                 | Steel                        | Diesel                                                                   |                                       | Tank                | Manual, Remote level indication monitored by Colonial. |                        | 1 2000          | P                                              | Tank Puncture                  | 2000 gal in 30 minutues | Storm water ditches to Outfalls | Manual         | Y        | Double-Walled    |
|  | FO-02                                                                                                           | Diesel Storage Tank, Adjacent to Shipping Area, Installed 2021                                                             | Steel                        | Diesel                                                                   |                                       | Tank                | Manual, Remote level indication monitored by Colonial. |                        | 1 2000          | P                                              | Tank Puncture                  | 2000 gal in 30 minutues | Storm water ditches to Outfalls | Manual         | Y        | Double-Walled    |
|                                                                                    |  Former FM Oil Room and Ramp | Former Foil Mill Oil Room. Contains FM-1 through FM-9. Tanks and process units have been drained are no longer in service. | Steel                        | Rolling Oil, Heat Transfer Fluid, Hydraulic Oil, Oily Diatomaceous Earth | Mark Smith (No Longer Used and Empty) | Out of Service Area | Manual Visual                                          |                        | 3 5000          | [P, E & L (5), I (10)] or [P, E (5) and L (2)] | Tank Failure                   | 5000 gal in 30 minutes  | Storm water ditches to Outfalls | Totes/Drums    | N        |                  |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION | CONSTRUCTION MATERIAL | CONTENTS               | JW TEAMMATE RESP                      | Type | LEVEL INDICATION | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED                                     | POTENTIAL SPILL SCENARIO | MAX SPILL RATE         | PATH TO WATER                   | FILLING SOURCE            | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|------------------------|---------------------------------------|------|------------------|---------------------|--------------|------------------------------------------------|--------------------------|------------------------|---------------------------------|---------------------------|----------|---------------|
|    | FM-01  | Foil Mill Oil Room       | Steel                 | Rolling Oil Clean Tank | Mark Smith (No Longer Used and Empty) | Tank | Manual Visual    |                     | 33000        | [P, E & L (5), I (10)] or [P, E (5) and L (2)] | Tote/Drum Puncture       | 3000 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums               | N        |               |
|    | FM-02  | Foil Mill Oil Room       | Steel                 | Rolling Oil Dirty Tank | Mark Smith (No Longer Used and Empty) | Tank | Manual Visual    |                     | 33000        | [P, E & L (5), I (10)] or [P, E (5) and L (2)] | Tank Failure             | 3000 gal in 30 minutes | Storm water ditches to Outfalls | Transfer from Indoor Sump | N        |               |
|  | FM-03  | Foil Mill Oil Room       | Steel                 | Rolling Oil Clean Tank | Mark Smith (No Longer Used and Empty) | Tank | Manual Visual    |                     | 35000        | [P, E & L (5), I (10)] or [P, E (5) and L (2)] | Tote/Drum Puncture       | 5000 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums               | N        |               |
|  | FM-04  | Foil Mill Oil Room       | Steel                 | Rolling Oil Dirty Tank | Mark Smith (No Longer Used and Empty) | Tank | Manual Visual    |                     | 35000        | [P, E & L (5), I (10)] or [P, E (5) and L (2)] | Tank Failure             | 5000 gal in 30 minutes | Storm water ditches to Outfalls | Transfer from Indoor Sump | N        |               |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION | CONSTRUCTION MATERIAL | CONTENTS                        | JW TEAMMATE RESP                      | Type                 | LEVEL INDICATION | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED    | POTENTIAL SPILL SCENARIO | MAX SPILL RATE        | PATH TO WATER                   | FILLING SOURCE | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|---------------------------------|---------------------------------------|----------------------|------------------|---------------------|--------------|---------------|--------------------------|-----------------------|---------------------------------|----------------|----------|---------------|
|    | FM-05  | Foil Mill Cooling Tower  | Steel                 | Heat Transfer Fluid (Oil-based) | Mark Smith (No Longer Used and Empty) | Processing Equipment | Manual Visual    | 3                   | Est. 50 gal  | P             | Equipment Puncture       | 50 gal in 30 min      | Storm water ditches to Outfalls | Tote           | N        |               |
|    | FM-06  | Foil Mill Oil Room       | Steel                 | Hydraulic Oil                   | Mark Smith (No Longer Used and Empty) | Tank                 | Manual Visual    | 3                   | 350          | P, E & L (10) | Tote/Drum Puncture       | 350 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums    | N        |               |
|   | FM-07  | Foil Mill Oil Room       | Steel                 | Hydraulic Oil                   | Mark Smith (No Longer Used and Empty) | Processing Equipment | Manual Visual    | 3                   | 100          | P, E & L (10) | Tote/Drum Puncture       | 100 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums    | N        |               |
|  | FM-08  | Foil Mill Oil Room       | Steel                 | Oily Diatomaceous Earth         | Mark Smith (No Longer Used and Empty) | Tank                 | Manual Visual    | 3                   | 100          | P, E & L (10) | Tote/Drum Puncture       | 100 gal in 30 minutes | Storm water ditches to Outfalls | Manual         | N        |               |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                                     | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                | JW TEAMMATE<br>RESP                   | Type | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED    | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE      | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL |
|------------------------------------------------------------------------------------|--------|--------------------------------------------------------------|------------------------------|-------------------------|---------------------------------------|------|---------------------|------------------------|-----------------|---------------|--------------------------------|------------------------|---------------------------------|----------------|----------|------------------|
|    | FM-09  | Foil Mill Oil Room                                           | Steel                        | Oily Diatomaceous Earth | Mark Smith (No Longer Used and Empty) | Tank | Manual Visual       | 3                      | 150             | P, E & L (10) | Tote/Drum Puncture             | 150 gal in 30 minutes  | Storm water ditches to Outfalls | Manual         | N        |                  |
|   | FP-01  | Emergency Fire Pump House by Entrance                        | Steel                        | Diesel                  | Mark Smith                            | Tank | Manual Visual       | 1                      | 300             | P             | Tank Failure                   | 300 gal in 30 minutes  | Storm water ditches to Outfalls | Truck          | Y        | 499.8            |
|  | FT-01  | Outside of former coating room, located in containment basin | Steel                        | Mineral Spirits         | Mark Smith                            | Tank | Manual Visual       | 1                      | 8000            | P, E (20)     | Tank Failure                   | 8000 gal in 30 minutes | Storm water ditches to Outfalls | Truck          | Y        | 15798            |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                                     | CONSTRUC<br>TION<br>MATERIAL | CONTENTS        | JW TEAMMATE<br>RESP | Type | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY  | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE         | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL                      |
|------------------------------------------------------------------------------------|--------|--------------------------------------------------------------|------------------------------|-----------------|---------------------|------|---------------------|------------------------|------------------|------------|--------------------------------|---------------------------|---------------------------------|----------------|----------|---------------------------------------|
|    | FT-02  | East of Former Coating Line, Adjacent to Waste Room          | Steel                        | Mineral Spirits | Jason Hutto         | Tank | Manual Visual       |                        | 12400            | P          | Tank Failure                   | 2400 gal in 30 minutes    | Storm water ditches to Outfalls | Manual         | Y        | 2441                                  |
|    | FT-03  | Inside Former Storage Room of Coating Mix Area               | Plastic                      | Oil Storage     | Jason Hutto         | Tote | Manual Visual       |                        | 14 @ 100 to 1000 | P          | Puncture                       | 100 gallons in 30 minutes | Storm water ditches to Outfalls | Manual         | Y        | Plant Floor Area Sufficient           |
|   | FTS-01 | Engine Oil Tank, Black, Inside Fork Truck Shop/Roll Shop     | Steel                        | Engine Oil      | Mark Smith          | Tank | Manual Visual       | n/a                    | 330 gal          | P          | Puncture                       | 330 gal in 30 minutues    | Paved Road to Pond A1           | Manual         | Y        | Tank is Double Walled, High Viscosity |
|  | FTS-02 | Hydraulic Oil Tank, Yellow, Inside Fork Truck Shop/Roll Shop | Steel                        | Hydraulic Oil   | Mark Smith          | Tank | Manual Visual       | n/a                    | 330 gal          | P          | Puncture                       | 330 gal in one hour       | Paved Road to Pond A1           | Manual         | Y        | Tank is Double Walled, High Viscosity |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                                  | CONSTRUCTION MATERIAL | CONTENTS  | JW TEAMMATE RESP | Type                | LEVEL INDICATION | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO | MAX SPILL RATE         | PATH TO WATER                   | FILLING SOURCE | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|-----------------------------------------------------------|-----------------------|-----------|------------------|---------------------|------------------|---------------------|--------------|------------|--------------------------|------------------------|---------------------------------|----------------|----------|---------------|
|    | FTS-03 | Used Oil Tote, Located in Fork Truck Wash Area            | Stainless Steel       | Waste oil | Mark Smith       | Tote                | Manual Visual    | 1                   | 250 gal      | P          | Puncture                 | 250 gal in 30 minutes  | Storm water ditches to outfalls | Manual         | N        | n/a           |
|   | GEN-01 | Mobile Generator, Varies - Portable Unit Moved Frequently | Steel                 | Diesel    | Mahmud Gusau     | Emergency Generator | Manual Visual    | 1                   | 1500         | P          | Puncture                 | 1500 gal in 30 minutes | Storm water ditches to Outfalls | Manual         | N        | n/a           |
|  | GEN-02 | Mobile Generator, Varies - Portable Unit Moved Frequently | Steel                 | Diesel    | Tyler Hamby      | Emergency Generator | Manual Visual    | 1                   | 300          | P          | Puncture                 | 300 gal in 30 minutes  | Storm water ditches to Outfalls | Manual         | N        | n/a           |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                                                                           | CONSTRUCTION MATERIAL | CONTENTS            | JW TEAMMATE RESP | Type                 | LEVEL INDICATION | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO | MAX SPILL RATE            | PATH TO WATER                   | FILLING SOURCE | SEC CONT | SEC CONT, GAL    |
|------------------------------------------------------------------------------------|--------|----------------------------------------------------------------------------------------------------|-----------------------|---------------------|------------------|----------------------|------------------|---------------------|--------------|------------|--------------------------|---------------------------|---------------------------------|----------------|----------|------------------|
|    | GEN-04 | Natural Gas/Liquid Propane Fired Generator                                                         | Steel                 | Diesel              | Tyler Hamby      | Emergency Generator  | Manual Visual    |                     | 150          | P          | Tank Failure             | 50 gallon in 30 minutes   | Storm water ditches to Outfalls | Manual         | N        | n/a              |
|    | GEN-05 | Fuel Tank For CAT C13 Stationary Emergency Generator, Outdoors to West of Melting/Casting Building | Steel                 | Diesel              | Mahmud Gusau     | Emergency Generator  | Manual Visual    |                     | 639          | P          | Tank Failure             | 639 Gallons in 30 minutes | Storm water ditches to Outfalls | Manual         | N        | n/a              |
|   | HM-01  | Roll Grinder - Hot Mill Roll Shop, North End                                                       | Steel                 | Roll Grinding Fluid | David Sitarski   | Processing Equipment | n/a              | N/A                 | Varies       | N/A        | Equipment Failure        | 50 gallon in 30 minutes   | Storm water ditches to outfalls | n/a            | Y        | Plant Floor Area |
|  | HM-02  | Mineral Spirits Dip Tank - Hot Mill Roll Shop, Central                                             | Steel                 | Mineral Spirits     | David Sitarski   | Open Container       | Manual Visual    |                     | 250          | P          | Puncture                 | 250 gal in 30 minutes     | Storm water ditches to outfalls | Totes/Drums    | Y        | Plant Floor Area |

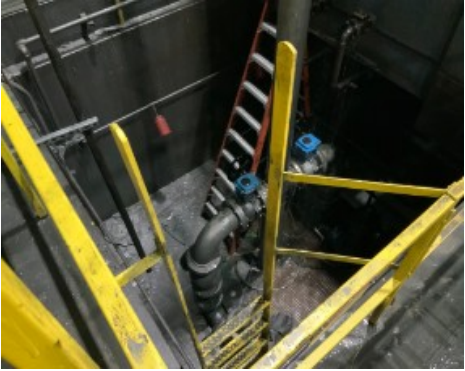
| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                                                  | CONSTRUCTION MATERIAL | CONTENTS                                                | JW TEAMMATE RESP | Type                 | LEVEL INDICATION     | STI SP-001 CATEGORY | MAX CAPACITY                                                                             | INSP SCHED                                                        | POTENTIAL SPILL SCENARIO   | MAX SPILL RATE            | PATH TO WATER                   | FILLING SOURCE    | SEC CONT | SEC CONT, GAL    |
|------------------------------------------------------------------------------------|--------|---------------------------------------------------------------------------|-----------------------|---------------------------------------------------------|------------------|----------------------|----------------------|---------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------|----------------------------|---------------------------|---------------------------------|-------------------|----------|------------------|
|    | HM-03  | Hot Mill Building                                                         | Varies                | Tandemol JW 8770 (3 - 4% volume emulsion) and tramp oil | David Sitarski   | Processing Equipment | External Level Gauge |                     | Varies, Oil Emulsion in Process Equipment                                                | P                                                                 | Hose/Equipment leak        | 50 gallon in 30 minutes   | Storm water ditches to outfalls | Process Equipment | n/a      | Plant Floor Area |
|    | HM-04  | In-Process FS-Lubrilam S40L/Mill Oil Tote - Hot Mill Building, West       | Plastic Tote          | FS-Lubrilam S40L/Mill Oil                               | David Sitarski   | Tote                 | Manual Visual        | N/A                 | Varies                                                                                   | P                                                                 | Tote Puncture              | 250 gallons in 30 minutes | Storm water ditches to outfalls | N/A               | Y        | Plant Floor Area |
|   | HM-05  | Hot Mill and Underground Sumps - Hot Mill Building, Southwest and Central | Varies                | Tandemol JW 8770 (3 - 4% volume emulsion) and tramp oil | David Sitarski   | Sump                 | Manual Visual        | N/A                 | 2200                                                                                     | Unable to Fully Inspect Underground Sump System and Transfer Pans | N/A                        | N/A                       | Storm water ditches to outfalls | Hot Mill Process  | n/a      | n/a              |
|  | HM-06  | Plate Filter 1 and Emulsion Tank 1 - Hot Mill Building, Northwest Corner  | Varies                | Tandemol JW 8770 (3 - 4% volume emulsion) and tramp oil | David Sitarski   | Processing Equipment | n/a                  | N/A                 | 18,518 gal (Dirty Side), 13,227 gal (Clean Side), Main Tank Total Capacity is 31,746 Gal | n/a                                                               | Hose leak or Sump Overflow | 30,000 gal in 60 minutes  | Storm water ditches to outfalls | Pump              | n/a      | Plant Floor Area |

| Photo                                                                             | MAP ID | DESCRIPTION AND LOCATION                                                 | CONSTRUCTION MATERIAL | CONTENTS                                                | JW TEAMMATE RESP | Type                 | LEVEL INDICATION     | STI SP-001 CATEGORY | MAX CAPACITY                                                                             | INSP SCHED | POTENTIAL SPILL SCENARIO   | MAX SPILL RATE           | PATH TO WATER                   | FILLING SOURCE | SEC CONT | SEC CONT, GAL    |
|-----------------------------------------------------------------------------------|--------|--------------------------------------------------------------------------|-----------------------|---------------------------------------------------------|------------------|----------------------|----------------------|---------------------|------------------------------------------------------------------------------------------|------------|----------------------------|--------------------------|---------------------------------|----------------|----------|------------------|
|   | HM-07  | Plate Filter 2 and Emulsion Tank 2 - Hot Mill Building, Northwest Corner | Varies                | Tandemol JW 8770 (3 - 4% volume emulsion) and tramp oil | David Sitarski   | Processing Equipment | n/a                  | N/A                 | 18,518 gal (Dirty Side), 13,227 gal (Clean Side), Main Tank Total Capacity is 31,746 Gal | n/a        | Hose leak or Sump Overflow | 30,000 gal in 60 minutes | Storm water ditches to outfalls | Pump           | n/a      | Plant Floor Area |
|   | HM-08  | Hot Mill Tank Farm                                                       | Steel                 | Tandemol JW 8770 (3 - 4% volume emulsion) and tramp oil | David Sitarski   | Tank                 | External Level Gauge | 1                   | 8500                                                                                     | P, E (20)  | Tank Flange Gasket Failure | 120 gallons per hour     | Storm water ditches to Outfalls | Truck          | Y        | 56848            |
|  | HM-09  | Hot Mill Tank Farm                                                       | Steel                 | Tandemol JW 8770 (3 - 4% volume emulsion) and tramp oil | David Sitarski   | Tank                 | External Level Gauge | 1                   | 23000                                                                                    | P, E (20)  | Tank Flange Gasket Failure | 120 gallons per hour     | Storm water ditches to Outfalls | Truck          | Y        | 56848            |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                               | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                                                | JW TEAMMATE<br>RESP | Type                 | LEVEL<br>INDICATION  | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE     | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL |
|------------------------------------------------------------------------------------|--------|--------------------------------------------------------|------------------------------|---------------------------------------------------------|---------------------|----------------------|----------------------|------------------------|-----------------|------------|--------------------------------|-----------------------|---------------------------------|----------------|----------|------------------|
|    | HM-10  | Hot Mill Tank Farm                                     | Steel                        | Tandemol JW 8770 (3 - 4% volume emulsion) and tramp oil | David Sitarski      | Tank                 | External Level Gauge | 1                      | 23000           | P, E (20)  | Tank Flange Gasket Failure     | 120 gallons per hour  | Storm water ditches to Outfalls | Truck          | Y        | 56848            |
|   | HM-11  | Mineral Spirits Dip Tank - Hot Mill Roll Shop, Central | Steel                        | Mineral Spirits                                         | David Sitarski      | Open Container       | Manual Visual        | 1                      | 250             | P          | Puncture                       | 250 gal in 30 minutes | Storm water ditches to outfalls | Totes/Drums    | Y        | Plant Floor Area |
|  | HM-12  | Hydraulic Equipment in Hot Mill Roll Shop              | Varies                       | Hydraulic Fluid                                         | David Sitarski      | Processing Equipment | External Level Gauge | 1                      | 238             | P          | Puncture                       |                       | Storm water ditches to Outfalls | Manual         | N        | Spill Kit        |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION | CONSTRUC<br>TION<br>MATERIAL         | CONTENTS                                                                                                                                                                   | JW TEAMMATE<br>RESP | Type                       | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE               | PATH TO<br>WATER                      | FILLING SOURCE               | SEC CONT | SEC CONT,<br>GAL |
|------------------------------------------------------------------------------------|--------|--------------------------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------|---------------------|------------------------|-----------------|------------|--------------------------------|---------------------------------|---------------------------------------|------------------------------|----------|------------------|
|    | HW-01  | Old Coating Room         | Metal/Plastic<br>Drum, Steel<br>Tote | Floor Cleaner,<br>Isopropyl Alcohol,<br>Mineral Spirits,<br>Universal Waste (used<br>bulbs and batteries),<br>Hazardous Waste (lab<br>waste, waste paint,<br>broken bulbs) | Jason Hutto         | Bulk<br>Storage<br>(Drums) | Manual Visual       | 1                      | 5000 gal        | P          | Tote/Drum<br>Puncture          | 250 gallons in 30<br>minutues   | Storm drains to<br>Outfalls           | Manual                       | Y        | Plant Floor Area |
|    | IM-02  | I-Mill Oil Room          | Steel                                | Rolling Oil Dirty Tank                                                                                                                                                     | Mark Smith          | Tank                       | Manual Visual       | 1                      | 10000           | P, E (20)  | Tank Failure                   | 10000 gal in one<br>hour        | Storm water<br>ditches to<br>Outfalls | Transfer from Indoor<br>Sump | Y        | 26000            |
|   |        | I-Mill Cooling Tower     | Steel                                | FS-Lubrilam S40L Oil<br>in Tube Nest                                                                                                                                       | Mark Smith          |                            | Manual Visual       | 3                      | 250             | P          | Leak                           | 250 gal in 30<br>minutes        | Storm water<br>ditches to<br>Outfalls | Totes/Drums                  | Y        | 26000            |
|  | IM-03  | I-Mill Oil Room          | Steel                                | Oily Diatomaceous<br>Earth                                                                                                                                                 | Mark Smith          | Tank                       | Manual Visual       | 1                      | 250             | P          | Drum puncture                  | Local Cleanup of<br>oily solids | Local Cleanup of<br>oily solids       | Manual                       | Y        | 26000            |

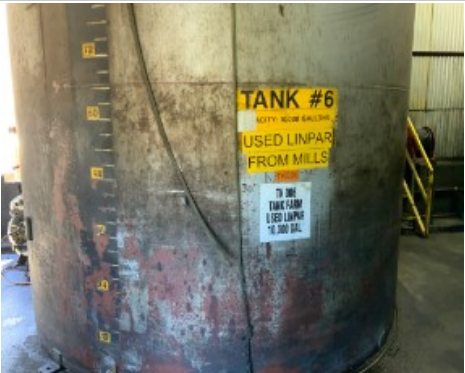
| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION | CONSTRUCTION MATERIAL | CONTENTS               | JW TEAMMATE RESP | Type                 | LEVEL INDICATION     | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO | MAX SPILL RATE        | PATH TO WATER                   | FILLING SOURCE | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|------------------------|------------------|----------------------|----------------------|---------------------|--------------|------------|--------------------------|-----------------------|---------------------------------|----------------|----------|---------------|
|    | IM-04  | I-Mill Oil Room          | Steel                 | Hydraulic Oil          | Mark Smith       | Processing Equipment | Manual Visual        |                     | 1150         | P          | Tank Failure             | 150 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums    | Y        | 26000         |
|   | IM-01  | I-Mill Oil Room          | Steel                 | Rolling Oil Clean Tank | Mark Smith       | Tank                 | Manual Visual        |                     | 110000       | P, E (20)  | Tank Failure             | 10000 gal in one hour | Storm water ditches to Outfalls | Totes/Drums    | Y        | 26000         |
|  | IM-08  | Hunter Motor             | Manual Visual         | Oil                    | Metal Drum       | Motor                | External Level Gauge |                     | 1235         | P          | Puncture                 |                       | Storm water ditches to Outfalls | Manual         | N        | Spill Kit     |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION               | CONSTRUCTION MATERIAL                       | CONTENTS               | JW TEAMMATE RESP | Type                 | LEVEL INDICATION     | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO | MAX SPILL RATE         | PATH TO WATER                   | FILLING SOURCE            | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|----------------------------------------|---------------------------------------------|------------------------|------------------|----------------------|----------------------|---------------------|--------------|------------|--------------------------|------------------------|---------------------------------|---------------------------|----------|---------------|
|    | IM-09  | Hydraulic Equipment in I-mill Oil Room | Steel                                       | Hydraulic Fluid        | Mark Smith       | Processing Equipment | Manual Visual        |                     | 140          | P          | Puncture                 | 40 gal in 30 minutes   | Storm water ditches to Outfalls | Manual                    | N        | Spill Kit     |
|    | KM-01  | K-Mill Oil Room                        | Steel                                       | Rolling Oil Clean Tank | Mark Smith       | Tank                 | Manual Visual        |                     | 15000        | P          | Tank Failure             | 5000 gal in 30 minutes | Storm water ditches to Outfalls | Totes                     | Y        | 20000         |
|  | KM-02  | K-Mill Oil Room                        | Steel                                       | Rolling Oil Dirty Tank | Mark Smith       | Tank                 | Manual Visual        |                     | 15000        | P          | Tank Failure             | 5000 gal in 30 minutes | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y        | 20000         |
|  | KM-03  | K-Mill Oil Room                        | Steel lined concrete pit in tight clay soil | Rolling Oil Sump Pit   | Mark Smith       | Control Measure      | External Sight Gauge |                     | 120000       | P, E (20)  | Overflow                 | n/a                    | Storm water ditches to Outfalls | In-room drainage          | n/a      | n/a           |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION | CONSTRUCTION MATERIAL | CONTENTS                          | JW TEAMMATE RESP | Type                 | LEVEL INDICATION | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO | MAX SPILL RATE     | PATH TO WATER                | FILLING SOURCE                  | SEC CONT    | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|-----------------------------------|------------------|----------------------|------------------|---------------------|--------------|------------|--------------------------|--------------------|------------------------------|---------------------------------|-------------|---------------|
|    | KM-04  | K-Mill Oil Room          | Steel                 | FS-Lubrilam S40L Oil in Tube Nest | Mark Smith       | Processing Equipment | Manual Visual    |                     | 3            | 250        | P                        | Tote Puncture      | 250 gal in 30 minutes        | Storm water ditches to Outfalls | Totes       | 20000         |
|   | KM-05  | K-Mill Oil Room          | Steel                 | Oily Diatomaceous Earth           | Mark Smith       | Tank                 | Manual Visual    |                     | 1            | 250        | P                        | Drum Puncture      | Local Cleanup of oily solids | Local Cleanup of oily solids    | Manual      | 20000         |
|  | KM-06  | K-Mill Oil Room          | Steel                 | Oily Diatomaceous Earth           | Mark Smith       | Tank                 | Manual Visual    |                     | 1            | 250        | P                        | Drum Puncture      | Local Cleanup of oily solids | Local Cleanup of oily solids    | Manual      | 20000         |
|  | KM-07  | K-Mill Oil Room          | Steel                 | Hydraulic Oil                     | Mark Smith       | Tank                 | Manual Visual    |                     | 1            | 500        | P                        | Tote/Drum Puncture | 500 gal in 30 minutes        | Storm water ditches to Outfalls | Totes/Drums | 20000         |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                        | CONSTRUCTION MATERIAL | CONTENTS          | JW TEAMMATE RESP | Type                 | LEVEL INDICATION | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO  | MAX SPILL RATE        | PATH TO WATER                   | FILLING SOURCE                       | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|-------------------------------------------------|-----------------------|-------------------|------------------|----------------------|------------------|---------------------|--------------|------------|---------------------------|-----------------------|---------------------------------|--------------------------------------|----------|---------------|
|    | KM-08  | Tank Farm                                       | Steel                 | Dirty Rolling Oil | Mark Smith       | Tank                 | Manual Visual    |                     | 1450         | P          | Tank Failure, Overfilling | 450 gal in 30 minutes | Storm water ditches to Outfalls | Fume Collection from Mist Eliminator | Y        | 26020         |
|    | KM-09  | Additive storage rack 2, K-Mill Alley, East     | Stainless Steel       | Additive – AL 116 | Mark Smith       | Bulk Storage (Totes) | Manual Visual    |                     | 1450         | P          | Tote Puncture             | 450 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums                          | n/a      | n/a           |
|   | KM-10  | Tote Storage Area, South of Motor Room & K-Mill | Plastic Totes         | Dirty Amp Wash    | Mark Smith       | Bulk Storage (Totes) | Manual Visual    |                     | 15 @ 250     | P          | n/a                       | 250 gal in 30 minutes | Storm water ditches to Outfalls |                                      | Y        | n/a           |
|  | KM-11  | Tote Storage Area, K-Mill Alley, West           | Stainless Steel       | Additive – AL 116 | Mark Smith       | Bulk Storage (Totes) | Manual Visual    |                     | 1Many @ 450  | P          | Tote Puncture             | 450 gal in 30 minutes | Storm water ditches to Outfalls | Totes/Drums                          | n/a      | n/a           |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                        | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                   | JW TEAMMATE<br>RESP | Type           | LEVEL<br>INDICATION  | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE     | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL |
|------------------------------------------------------------------------------------|--------|-------------------------------------------------|------------------------------|----------------------------|---------------------|----------------|----------------------|------------------------|-----------------|------------|--------------------------------|-----------------------|---------------------------------|----------------|----------|------------------|
|    | MP-001 | Adjacent to Compressor Room                     | Steel                        | Mop Water                  | Mark Smith          | Tank           | Manual Visual        | 1                      | 500             | P          | Tank Failure                   | 500 gal in 30 minutes | Storm water ditches to Outfalls | Manual         | Y        | 1414             |
|   | MS-001 | Mineral Spirits Dip Tank - Inside Old Roll Shop | Steel                        | Mineral Spirits            | Mark Smith          | Open Container | Manual Visual        | 1                      | 250             | P          | Puncture                       | 250 gal in 30 minutes | Storm water ditches to Outfalls | Manual         | N        | n/a              |
|  | TF-01  | K-Mill Tank Farm                                | Steel                        | Distilled FS-Lubrilam S40L | Mark Smith          | Tank           | External Sight Gauge | 1                      | 15000           | P, E (20)  | Tank Failure                   | 15000 gal in one hour | Storm water ditches to Outfalls | Tanker         | Y        | 26020            |
|  | TF-02  | K-Mill Tank Farm                                | Steel                        | Virgin FS-Lubrilam S40L    | Mark Smith          | Tank           | External Sight Gauge | 1                      | 15000           | P, E (20)  | Tank Failure                   | 15000 gal in one hour | Storm water ditches to Outfalls | Tanker         | Y        | 26020            |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION | CONSTRUCTION MATERIAL | CONTENTS              | JW TEAMMATE RESP | Type | LEVEL INDICATION     | STI SP-001 CATEGORY | MAX CAPACITY | INSP SCHED | POTENTIAL SPILL SCENARIO | MAX SPILL RATE        | PATH TO WATER                   | FILLING SOURCE            | SEC CONT | SEC CONT, GAL |
|------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|-----------------------|------------------|------|----------------------|---------------------|--------------|------------|--------------------------|-----------------------|---------------------------------|---------------------------|----------|---------------|
|    | TF-03  | K-Mill Tank Farm         | Steel                 | Wastewater            | Mark Smith       | Tank | External Sight Gauge | 1                   | 10000        | P, E (20)  | Tank Failure             | 10000 gal in one hour | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y        | 26020         |
|    | TF-04  | K-Mill Tank Farm         | Steel                 | Wastewater            | Mark Smith       | Tank | External Sight Gauge | 1                   | 10000        | P, E (20)  | Tank Failure             | 10000 gal in one hour | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y        | 26020         |
|   | TF-05  | K-Mill Tank Farm         | Steel                 | Wastewater            | Mark Smith       | Tank | External Sight Gauge | 1                   | 15000        | P, E (20)  | Tank Failure             | 15000 gal in one hour | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y        | 26020         |
|  | TF-06  | K-Mill Tank Farm         | Steel                 | Used FS-Lubrilam S40L | Mark Smith       | Tank | External Sight Gauge | 1                   | 10000        | P, E (20)  | Tank Failure             | 10000 gal in one hour | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y        | 26020         |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                                      | JW TEAMMATE<br>RESP                   | Type | LEVEL<br>INDICATION  | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE  | PATH TO<br>WATER      | FILLING SOURCE                  | SEC CONT                  | SEC CONT,<br>GAL |       |
|------------------------------------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------|---------------------------------------|------|----------------------|------------------------|-----------------|------------|--------------------------------|--------------------|-----------------------|---------------------------------|---------------------------|------------------|-------|
|    | TF-07  | K-Mill Tank Farm         | Steel                        | Wastewater                                    | Mark Smith                            | Tank | External Sight Gauge |                        | 1               | 10000      | P, E (20)                      | Tank Failure       | 10000 gal in one hour | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y                | 26020 |
|    | TF-08  | K-Mill Tank Farm         | Steel                        | Virgin FS-Lubrilam S40L                       | Mark Smith                            | Tank | External Sight Gauge |                        | 1               | 10000      | P, E (20)                      | Tank Failure       | 10000 gal in one hour | Storm water ditches to Outfalls | Transfer from Indoor Sump | Y                | 26020 |
|  | TF-09  | K-Mill Tank Farm         | Steel                        | Diesel                                        | Mark Smith (No Longer Used and Empty) | Tank | External Sight Gauge |                        | 1               | 350        | P                              | Tank Failure       | 350 gal in 30 minutes | Storm water ditches to Outfalls | Tanker                    | Y                | 26020 |
|  | TF-10  | K-Mill Tank Farm         | Steel                        | Distillation Unit, Distilled FS-Lubrilam S40L | Mark Smith                            | Tank | Manual Visual        |                        | 1               | 500        | P                              | Equipment Puncture | 500 gal in 30 minutes | Storm water ditches to Outfalls | Tote                      | Y                | 7888  |

| Photo                                                                              | MAP ID | DESCRIPTION AND LOCATION                            | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                                 | JW TEAMMATE<br>RESP | Type                       | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE            | PATH TO<br>WATER                      | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL |
|------------------------------------------------------------------------------------|--------|-----------------------------------------------------|------------------------------|------------------------------------------|---------------------|----------------------------|---------------------|------------------------|-----------------|------------|--------------------------------|------------------------------|---------------------------------------|----------------|----------|------------------|
|    | TSA-01 | In-Process TL Tote Storage,<br>West of TL3          | Stainless<br>Steel           | Mineral Spirits                          | Jason Hutto         | Bulk<br>Storage<br>(Totes) | Manual Visual       |                        | 1 8-12 @<br>250 | P          | Tote Puncture                  | 250 Gallons in<br>30 minutes | Storm water<br>ditches to<br>Outfalls | na             | Y        | Plant Floor Area |
|    | TSA-03 | Tote Storage Area, Adjacent<br>to Tension Leveler 1 | Stainless<br>Steel           | Clean Mineral Spirits,<br>Dirty Amp Wash | Jason Hutto         | Bulk<br>Storage<br>(Totes) | Manual Visual       |                        | 1 2 @ 250       | P          | Tote Puncture                  | 250 Gallons in<br>30 minutes | Storm water<br>ditches to<br>Outfalls | na             | Y        | Plant Floor Area |
|   | TSA-04 | Tote Storage Area, Adjacent<br>to Tension Leveler 2 | Stainless<br>Steel           | Clean Mineral Spirits,<br>Dirty Amp Wash | Jason Hutto         | Bulk<br>Storage<br>(Totes) | Manual Visual       |                        | 1 2 @ 250       | P          | Tote Puncture                  | 250 Gallons in<br>30 minutes | Storm water<br>ditches to<br>Outfalls | na             | Y        | Plant Floor Area |
|  | TSA-05 | Tote Storage Area, Adjacent<br>to Tension Leveler 3 | Stainless<br>Steel           | Clean Mineral Spirits,<br>Dirty Amp Wash | Jason Hutto         | Bulk<br>Storage<br>(Totes) | Manual Visual       |                        | 1 2 @ 250       | P          | Tote Puncture                  | 250 Gallons in<br>30 minutes | Storm water<br>ditches to<br>Outfalls | na             | Y        | Plant Floor Area |

| Photo                                                                             | MAP ID | DESCRIPTION AND LOCATION                      | CONSTRUC<br>TION<br>MATERIAL | CONTENTS                                                 | JW TEAMMATE<br>RESP | Type                 | LEVEL<br>INDICATION | STI SP-001<br>CATEGORY | MAX<br>CAPACITY                    | INSP SCHED | POTENTIAL<br>SPILL<br>SCENARIO | MAX SPILL<br>RATE         | PATH TO<br>WATER                | FILLING SOURCE | SEC CONT | SEC CONT,<br>GAL      |
|-----------------------------------------------------------------------------------|--------|-----------------------------------------------|------------------------------|----------------------------------------------------------|---------------------|----------------------|---------------------|------------------------|------------------------------------|------------|--------------------------------|---------------------------|---------------------------------|----------------|----------|-----------------------|
|   | TSA-06 | Tote Storage Area, South of Oil Room & K-Mill | Plastic Totes                | Mineral Spirits & Amp Wash                               | Mark Smith          | Bulk Storage (Totes) | Manual Visual       |                        | 1250                               | P          | n/a                            | 2500 gal in 30 minutes    | Storm water ditches to Outfalls | na             | Y        | 26020                 |
|   | -      | Motor Room                                    | Concrete                     | Contains Oil distillation columns and process equipment. | Mark Smith          | Control Measure      | n/a                 | n/a                    | No Storage, In-Process Fluids Only | n/a        | n/a                            | n/a                       | n/a                             | n/a            | n/a      | n/a                   |
|  | OCR-01 | Oil Control Room, Clean Oil Tank              | Stainless Steel              | Clean Oil                                                | Mark Smith          | Tank                 | Manual Visual       |                        | 1550                               | P          | Tote Puncture                  | 350 Gallons in 30 minutes | Storm water ditches to outfalls | N/A            | n/a      | Floor Area Sufficient |
|                                                                                   |        |                                               |                              |                                                          |                     |                      |                     |                        |                                    |            |                                |                           |                                 |                |          |                       |

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## **APPENDIX M**

### **Contractor-Owned Tank Inventory**

# Spill Response Procedures



## **In the Event of a Spill of any Size:**

1. Notify the Corporate Environmental Contact, **Kelli Tracy (843) 572-1100** who will determine the course of action based on whether the spill is a “minor” or a “major” spill.

## **General Spill Response Procedures:**

1. Eliminate potential spark sources.
2. If possible and safe to do so: identify and shut down the source of the discharge to stop the flow.
3. Contain the discharge with sorbents, boom, catch basin covers, berms or sandbags.
4. Contact regulatory authorities and the response organization.
5. Collect and dispose of recovered products according to regulation.

## **In the event of a Minor Spill:**

1. Under the direction of Facility Manager (or senior on-site person), contain and cleanup the discharge with discharge response materials and equipment located in JW Aluminum’s spill response kits throughout the facility.
2. Place all discharge and clean up debris in properly labeled waste containers for proper disposal.

## **In the Event of a Major Spill:**

1. All workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas.
2. The Facility Manager, or other senior on-site person, will be responsible for calling for any medical, fire or police assistance as needed.
3. The Facility Manager will be responsible for contacting an outside spill response and clean up contractor and overseeing the subsequent clean up.

## **In addition, the Facility Manager (or their designee) will be responsible for:**

1. The proper disposal of a waste spill related material.
2. Making any required notifications to the appropriate agencies.
3. Completing any written reports required by the spill.
4. Restocking the spill kits to replace any used materials.
5. Revising and updating the SPCC plan as needed.