

Spill Prevention, Control, and Countermeasure Plan

Prepared for:



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

Prepared by:

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September 2022

Revision 4



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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.

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 office building. The front office is attended whenever the facility is operating, 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.

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: Ben Walden

Signature:



Date:

9-14-22

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:

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 4 Plan is dated September 2022. The next plan review is therefore scheduled to take place on or prior to September 2027.

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, 2025.

Table 1-1: Plan Review Log

By	Date	Activity	PE certification required?	Comments
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/ 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

* 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.

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

Provision	Plan Section	Page
112.3(d)	Professional Engineer Certification	4
112.3(e)	Location of SPCC Plan	5
112.5	Plan Review	5 Table 1-1
112.7	Management Approval	3
112.7	Cross-Reference with SPCC Rule	Table 1-2
112.7(a)(3)	Part 2: General Facility Information Appendix A: Site Plan and Facility Diagrams	11 Appendix A
112.7(a)(4)	5.4 Discharge Notification	27 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 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

Provision	Plan Section	Page
112.8(c)(3)	4.2.3 Drainage of Diked Areas	22 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 Appendix C - Facility Inspection Checklists	23 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.

Part 2. General Facility Information

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

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. Wellspring Capital Management is the current owner 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, A-3, and A-4) 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. Dielectric mineral oil contained in electrical transformers;
- f. Mineral oil used in slitter operations; and
- g. 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, A-3, and A-4). 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		

Part 3. 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, A-3, and A-4 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, A-3 and A-4. 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 his 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 May of each year using the checklist provided in Appendix C of this Plan.

Written annual inspection records are signed by the Facility Manager and 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 the facility designee and 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 by the Facility Manager 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 his 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"> <input type="checkbox"/> Visually check all hoses for leaks and wet spots. <input type="checkbox"/> Verify that sufficient volume is available in the storage tank or truck. <input type="checkbox"/> Lock in the closed position all drainage valves of the secondary containment structure. <input type="checkbox"/> Secure the tank vehicle with wheel chocks and interlocks. <input type="checkbox"/> Ensure that the vehicle’s parking brakes are set. <input type="checkbox"/> Verify proper alignment of valves and proper functioning of the pumping system. <input type="checkbox"/> If filling a tank truck, inspect the lowermost drain and all outlets. <input type="checkbox"/> Establish adequate bonding/grounding prior to connecting to the fuel transfer point. <input type="checkbox"/> Turn off cell phone.
During loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Driver must stay with the vehicle at all times during loading/unloading activities. <input type="checkbox"/> Periodically inspect all systems, hoses and connections. <input type="checkbox"/> When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. <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. <input type="checkbox"/> Maintain communication with the pumping and receiving stations. <input type="checkbox"/> Monitor the liquid level in the receiving tank to prevent overflow. <input type="checkbox"/> Monitor flow meters to determine rate of flow. <input type="checkbox"/> When topping off the tank, reduce flow rate to prevent overflow.
After loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Make sure the transfer operation is completed. <input type="checkbox"/> Close all tank and loading valves before disconnecting. <input type="checkbox"/> Securely close all vehicle internal, external, and dome cover valves before disconnecting. <input type="checkbox"/> Secure all hatches. <input type="checkbox"/> Disconnect grounding/bonding wires. <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. <input type="checkbox"/> Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage. <input type="checkbox"/> Remove wheel chocks and interlocks. <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.

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.

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

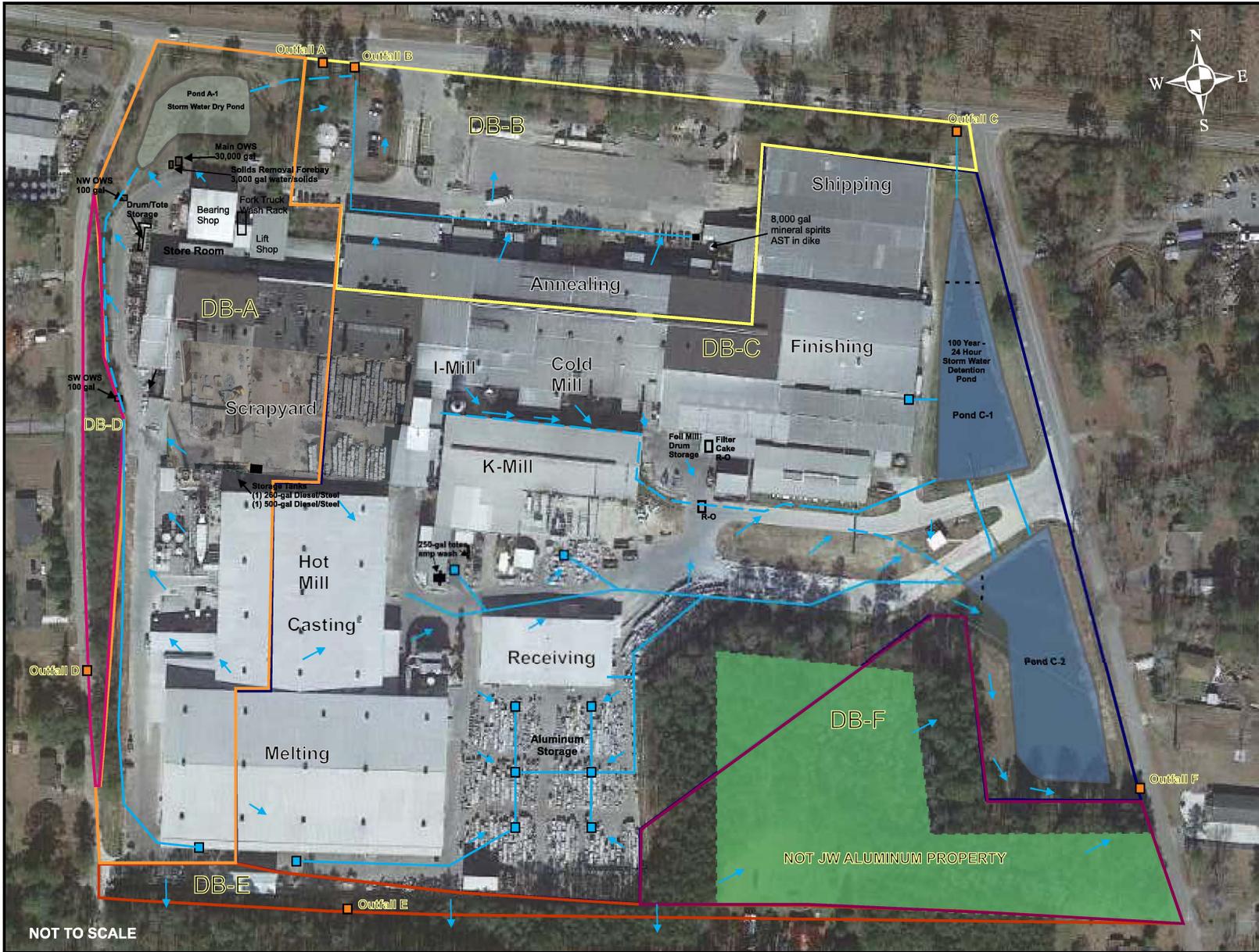


Figure 2
Site Layout Map
JW Aluminum, Inc.
Mt. Holly Facility
Goose Creek, SC
 May 2017
 revised September 2022

LEGEND

- Storm Water Flow Direction
- R-O Roll off Container
- Open Storm Water Conveyance
- Underground Storm Water Conveyance
- Drainage Basins (multiple colors)
- Turbidity Curtain
- Storm Water Detention Pond
- Storm Water Dry Pond
- Storm Water Outfall
- Storm Water Inlet/ Storm Drain Covers for Spill Response
- Storm Water Drain
- Sorbent Boom

- NOTES:**
1. Size of Property = 45 acres
 2. Acres exposed to industrial activity = 38 acres
 3. No significant spills or leaks with the last 3 years
 4. Site located within Berkeley County MS4
 5. Base Map: Google Earth Aerial dated 2021

NOT TO SCALE

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

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.

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 *John B. Walden* Title General Manager

Name Ben Walden Date ~~9-14-22~~ 9-14-22

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
Storage tanks			
<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>			
Response Equipment			
<i>Response equipment inventory is incomplete</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
Storage tanks			
AST			
<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>			
Totes			
<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>			
Small Storage Containers			
<i>Surfaces show signs of leakage</i>			
<i>Containers are damaged, rusted, or deteriorated</i>			
<i>Bolts, rivets, or seams are damaged</i>			
Response equipment			
<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

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:

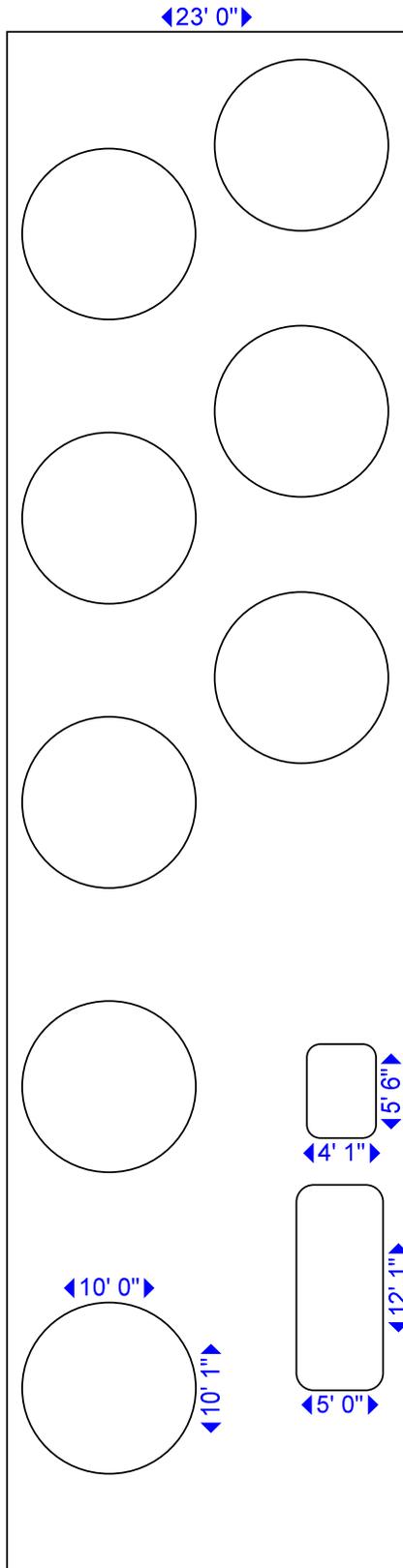
- Tank Farm 1 (TF-01 to TF-09)
- Distillation Unit in indoor diked area adjacent to Tank Farm 1 (TF-10)
- Diked Area Adjacent to Shipping/Former Coating Line (FT-01)
- Mop water tank (MP-001)
- Emergency Generator diesel tank (EG-001)
- Korean Mill Oil Room (KM-01 to KM-03, KM-05 to KM-07)
- Cold Mill 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 (Outside Fork Truck Shop)
- Drum Storage Area DS-03 (Outside Stores and Legacy Roll Shop)
- Drum Storage Area DS-04 (Boilermaker Melting)
- Drum Storage Area DS-05 (Outside I-mill in Alley)
- HM-02
- HM-03
- HM-04

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' x 90' x 2.4' = 4968 ft³
 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' X (3.14/4*(10'^2)) x 2.4' = 1318.8 ft³
 or
 9865 gal**

Box

5.5' x 4' x 2.4' = 52.8 ft³ = 395 gal

Horiz Tank

**12' x (3.14/4*5'^2) x 50% = 117.8 ft³
 or
 881 gal**

Total Interference = 9865 + 395 + 881 = 11141 gal

**Total Available Containment = 37161 - 11141
 = 26020 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**

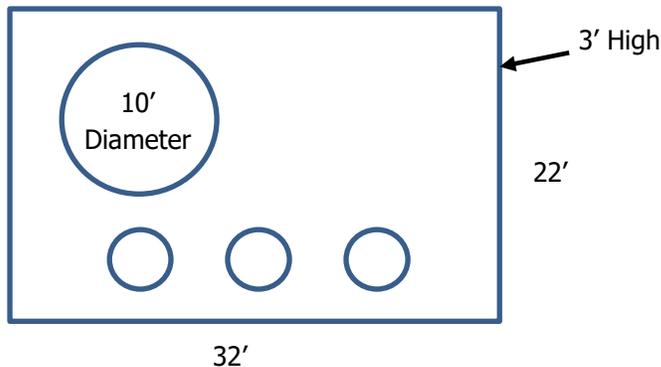
Distillation Unit (TF-10)

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.

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

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.

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

$$\text{Required Containment} = 8,000 \text{ gal} + \text{Precipitation}$$

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

$$\text{Total Required Containment} = 8,000 \text{ gal} + 3,291 \text{ gal} = 11,291 \text{ gallons}$$

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' x 14.5' x 1') x 7.48 gal/ft³ = 819 gallons

Obstructed Containment = 819 gallons x 25% = 205 gallons

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

Required Containment = (4' x 4' x 4') x 7.48 gal/ft³ = 478.7 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' x 8' x 4.8') x 7.48 gal/ft³ = 2,441 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

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

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

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

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

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

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

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

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

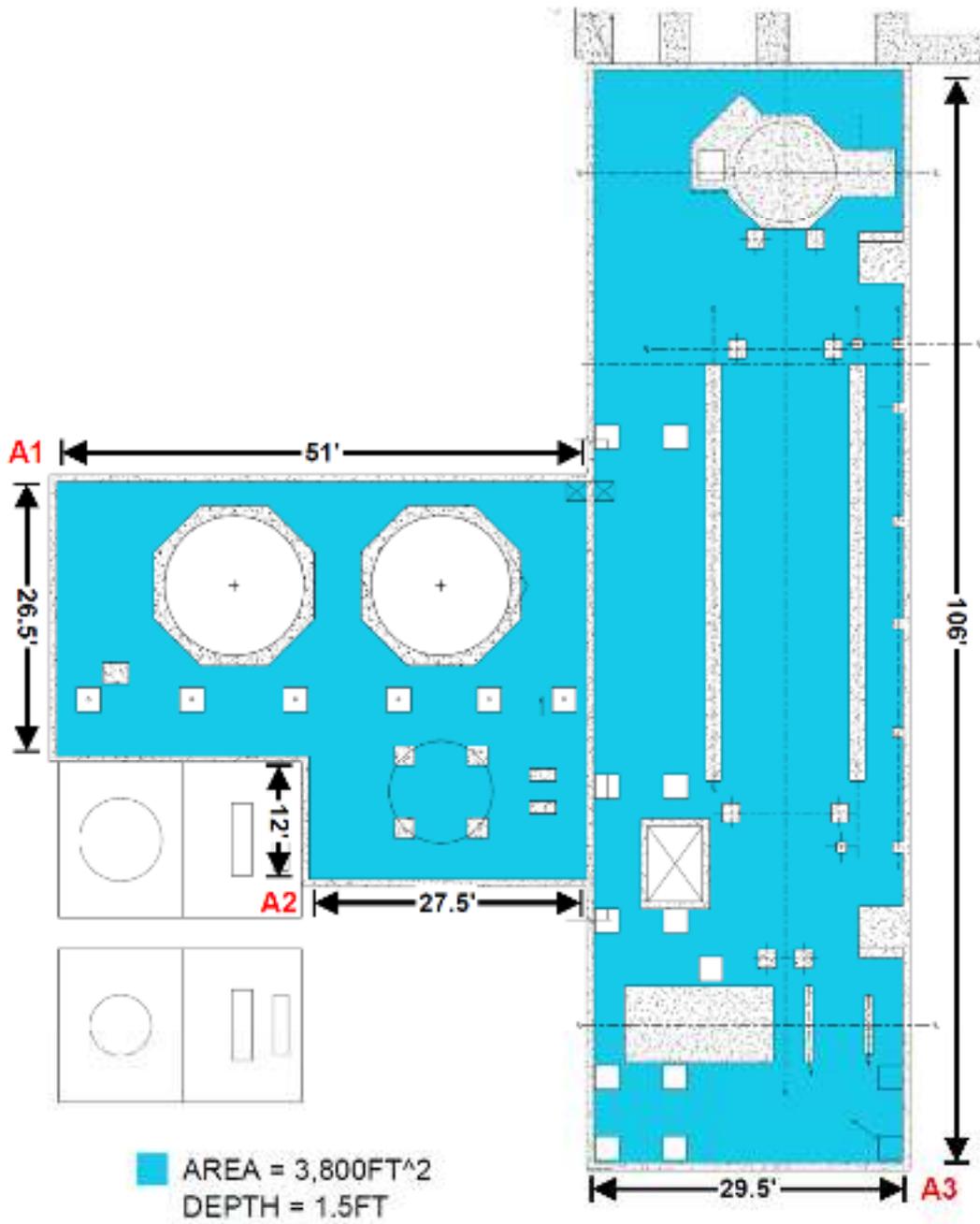
$$\text{Net Containment Volume} = 56,848 \text{ gal}$$

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

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

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

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



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 (Outside Fork Truck Shop)
- Drum Storage Area DS-03 (Outside Stores and Legacy Roll Shop)
- 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.

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

DHEC 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:	Ben Walden
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
--	----------------------	--------------------------------------

Discharge in any amount:

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

Discharge in amount exceeding 10 gallons and *not affecting a waterbody or groundwater*

Local Fire Department Fire Chief 911		
DHEC Emergency Response Center (888) 481-0125		

Discharge in any amount and affecting (or threatening to affect) a waterbody

Local Fire Department Fire Chief 911		
DHEC Emergency Response Center (888) 481-0125		
National Response Center (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 DHEC within 60 days of the qualifying discharge incident:

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

Facility:	<i>JW Aluminum, Inc.</i>
Owner/operator:	<i>JW Aluminum, Inc.</i>
Name of person filing report:	<i>Kelli Tracy, Corporate Environmental Engineer</i>
Location:	<i>435 Old Mount Holly Road, Goose Creek, SC 29445</i>
Maximum storage capacity:	Approximately 300,000 gallons
Daily throughput:	Varies
Nature of qualifying incident(s):	
<input type="checkbox"/> Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons	
<input type="checkbox"/> Second discharge exceeding 42 gallons within a 12-month period.	
Description of facility (attach maps, flow diagrams, and topographical maps):	
<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>	
<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>	

Agency Notification Standard Report (cont'd)

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

Photo	MAP ID	DESCRIPTION AND LOCATION	CONTENTS	Type	JW TEAMMATE RESP	CONSTRUCTION MATERIAL	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-01	Cold Mill Oil Room, Rolling Oil Clean Tank	Rolling Oil, Clean	Tank	Mark Smith	Steel	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	Rolling Oil Dirty	Tank	Mark Smith	Steel	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	Rolling Oil Dirty	Tank	Mark Smith	Steel lined concrete pit in tight clay soil	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	Oily Diatomaceous Earth	Tank	Mark Smith	Steel	Manual Visual	1	250	P	Tote/Drum Puncture	Local Cleanup of oily solids	Storm water ditches to Outfalls	Manual	Y	20000
	CM-05	Cold Mill Oil Room	Rolling Oil	Tank	Mark Smith	Steel	Manual Visual	1	500	P	Tote/Drum Puncture	500 gal in 30 minutes	Storm water ditches to Outfalls	Totes/Drums	Y	20000
	DS-01	Mobile equipment drum storage, Outside Fork Truck Wash Area	Gear Oil, Soap, Antifreeze, Transmission Fluid	Bulk Storage (Drums)	Mark Smith	Metal Drums, Plastic Drums	Manual Visual	1	Many @ 55	P	Puncture	250 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	Spill Kit
	DS-02	Drum Dispensing Rack, Inside Old Roll Shop	Oil	Drum	Mark Smith	Metal Drum	Manual Visual	1	55	P	Puncture	55 gal in 30 minutes	Storm water ditches to Outfalls	Manual	Y	Plant Floor Area Sufficient, 80 gallon sump
	DS-03	"Stores" Drum Storage, Outside Fork Truck Shop	New Oil, Mist, Hydraulic Oil, Fire Retardant, Motor Oil, and Transmission Fluid	Bulk Storage (Drums)	Mark Smith	Metal Drum	Manual Visual	1	Many @ 55	P	Puncture	250 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	Spill Kit
	DS-05	Alley - Drum Storage Shed (outside of I-Mill)	Various Oils	Bulk Storage (Drums)	Mark Smith	Metal Drum	Manual Visual	1	20-30 @ 55	P	Puncture	55 gal in 30 minutes	Storm water ditches to Outfalls		N	
	DS-06	Drum storage, I Mill Oil Room	New Oil	Bulk Storage (Drums)	Mark Smith	Metal Drum	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	Various Oils	Bulk Storage (Drums)	Mark Smith	Metal Drum	Manual Visual	1	8 @ 55	P	Puncture	55 gal in 30 minutes	Storm water ditches to Outfalls		Y	Plant Floor Area Sufficient

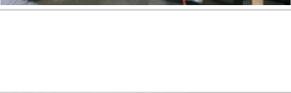
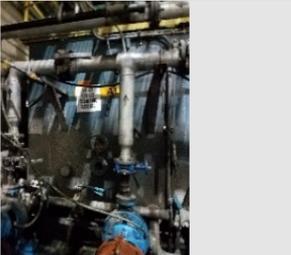
Photo	MAP ID	DESCRIPTION AND LOCATION	CONTENTS	Type	JW TEAMMATE RESP	CONSTRUCTION MATERIAL	LEVEL INDICATION	STI SP-001 CATEGORY	MAX CAPACITY	INSP SCHED	POTENTIAL SPILL SCENARIO	MAX SPILL RATE	PATH TO WATER	FILLING SOURCE	SEC CONT	SEC CONT. GAL
	DS-08	Misc Drum Storage, Alley Entry - Former Foil Mill	Gear and Misc. Oil	Bulk Storage (Drums)	Jason Hutto	Metal Drum	Manual Visual	1	Many @ 55	P	Puncture	250 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	Spill Kit
	DS-10	Drum storage adjacent to boilermaker roll grind equipment	Oil	Bulk Storage (Drums)		Metal Drum	Manual Visual	1	one @ 55	P	Puncture	55 in 30 minutes	Storm water ditches to Outfalls	Manual	N	Spill Kit
	HM-12	Hydraulic Equipment in Hot Mill Roll Shop	Hydraulic Fluid	Processing Equipment	David Sitarski	Varies	External Level Gauge	1	238	P	Puncture		Storm water ditches to Outfalls	Manual	N	Spill Kit
	IM-08	Hunter Motor	Oil	Motor	Metal Drum	Manual Visual	External Level Gauge	1	235	P	Puncture		Storm water ditches to Outfalls	Manual	N	Spill Kit
	DS-09	Drum Storage in K-Mill Oil Room, West Wall	Oil	Bulk Storage (Drums)		Metal Drum	Manual Visual	1	2 @ 55	P	Puncture	55 in 30 minutes	Storm water ditches to Outfalls	Manual	N	Spill Kit
	IM-07	Hydraulic Equipment in K-mill Oil Room	Hydraulic Fluid	Processing Equipment	Mark Smith	Steel	Manual Visual	1	40	P	Puncture	40 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	Spill Kit
	EG-001	By Generator Bldg; behind K-Mill MCC	Diesel	Tank	Mark Smith	Steel	Manual Visual	1	500	P	Tank Failure	500 gal in 30 minutes	Storm water ditches to Outfalls	Truck	Y	785 (Walled Area) Double Walled Tank
	FM-11	Alley Entry - Former Foil Mill	Mobilfluid 424	Tank	Jason Hutto	Steel	Manual Visual	1	One @ 200	P	Puncture	200 Gal in 30 minutes	Storm water ditches to Outfalls	Manual	Y	Plant Floor Area
	FM-12	Alley Entry - Former Foil Mill	Waste Oil	Tote	Jason Hutto	Plastic	Manual Visual	1	one @ 250	P	Puncture	250 Gal in 30 minutes	Storm water ditches to outfalls	Manual	Y	Plant Floor Area
	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.	Rolling Oil, Heat Transfer Fluid, Hydraulic Oil, Oily Diatomaceous Earth	Out of Service Area	Mark Smith (No Longer Used and Empty)	Steel	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	
	FM-01	Foil Mill Oil Room	Rolling Oil Clean Tank	Tank	Mark Smith (No Longer Used and Empty)	Steel	Manual Visual	3	3000	[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	

Photo	MAP ID	DESCRIPTION AND LOCATION	CONTENTS	Type	JW TEAMMATE RESP	CONSTRUCTION MATERIAL	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-02	Foil Mill Oil Room	Rolling Oil Dirty Tank	Tank	Mark Smith (No Longer Used and Empty)	Steel	Manual Visual	3	3000	[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	Rolling Oil Clean Tank	Tank	Mark Smith (No Longer Used and Empty)	Steel	Manual Visual	3	5000	[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	Rolling Oil Dirty Tank	Tank	Mark Smith (No Longer Used and Empty)	Steel	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	Transfer from Indoor Sump	N	
	FM-05	Foil Mill Cooling Tower	Heat Transfer Fluid (Oil-based)	Processing Equipment	Mark Smith (No Longer Used and Empty)	Steel	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	Hydraulic Oil	Tank	Mark Smith (No Longer Used and Empty)	Steel	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	Hydraulic Oil	Processing Equipment	Mark Smith (No Longer Used and Empty)	Steel	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	Oily Diatomaceous Earth	Tank	Mark Smith (No Longer Used and Empty)	Steel	Manual Visual	3	100	P, E & L (10)	Tote/Drum Puncture	100 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	
	FM-09	Foil Mill Oil Room	Oily Diatomaceous Earth	Tank	Mark Smith (No Longer Used and Empty)	Steel	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	Diesel	Tank	Mark Smith	Steel	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	Mineral Spirits	Tank	Mark Smith	Steel	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	CONTENTS	Type	JW TEAMMATE RESP	CONSTRUCTION MATERIAL	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
	FT-02	East of Former Coating Line, Adjacent to Waste Room	Mineral Spirits	Tank	Jason Hutto	Steel	Manual Visual	1	2400	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	Oil Storage	Tote	Jason Hutto	Plastic	Manual Visual	1	4 @ 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	Engine Oil	Tank	Mark Smith	Steel	Manual Visual	n/a	330 gal	P	Puncture	330 gal in 30 minutes	Paved Road to Pond A1	Manual	Y	Tank is Double Walled, High Viscosity
	FTS-02	Hydraulic Oil Tank, Yellow, Inside Fork Truck Shop	Hydraulic Oil	Tank	Mark Smith	Steel	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
	FTS-03	Inside Fork Truck Shop	Waste oil	Tote	Mark Smith	Stainless Steel	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	Diesel	Emergency Generator	Mahmud Gusau	Steel	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	Diesel	Emergency Generator	Tyler Hamby	Steel	Manual Visual	1	300	P	Puncture	300 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	GEN-04	Natural Gas/Liquid Propane Fired Generator	Diesel	Emergency Generator	Tyler Hamby	Steel	Manual Visual	1		P	Tank Failure		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	Diesel	Emergency Generator	Mahmud Gusau	Steel	Manual Visual	1	639	P	Tank Failure	639 Gallons in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a

Photo	MAP ID	DESCRIPTION AND LOCATION	CONTENTS	Type	JW TEAMMATE RESP	CONSTRUCTION MATERIAL	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-01	Roll Grinder - Hot Mill Roll Shop, North End	Roll Grinding Fluid	Processing Equipment	David Sitarski	Steel	n/a	N/A		N/A	Equipment Failure		Storm water ditches to outfalls	n/a	Y	Plant Floor Area
	HM-02	Mineral Spirits Dip Tank - Hot Mill Roll Shop, Central	Mineral Spirits	Open Container	David Sitarski	Steel	Manual Visual	1	250	P	Puncture	250 gal in 30 minutes	Storm water ditches to outfalls	Totes/Drums	Y	Plant Floor Area
	HM-04	In-Process FS-Lubrilam S40L/Mill Oil Tote - Hot Mill Building, West	FS-Lubrilam S40L/Mill Oil	Tote	David Sitarski	Plastic 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-03	Hot Mill Building	Tandemol JW 8770 (3-4% volume emulsion) and tramp oil	Processing Equipment	David Sitarski	Varies	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-05	Hot Mill and Underground Sumps - Hot Mill Building, Southwest and Central	Tandemol JW 8770 (3-4% volume emulsion) and tramp oil	Sump	David Sitarski	Varies	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	Tandemol JW 8770 (3-4% volume emulsion) and tramp oil	Processing Equipment	David Sitarski	Varies	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-07	Plate Filter 2 and Emulsion Tank 2 - Hot Mill Building, Northwest Corner	Tandemol JW 8770 (3-4% volume emulsion) and tramp oil	Processing Equipment	David Sitarski	Varies	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	Tandemol JW 8770 (3-4% volume emulsion) and tramp oil	Tank	David Sitarski	Steel	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	Tandemol JW 8770 (3-4% volume emulsion) and tramp oil	Tank	David Sitarski	Steel	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-10	Hot Mill Tank Farm	Tandemol JW 8770 (3-4% volume emulsion) and tramp oil	Tank	David Sitarski	Steel	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	CONTENTS	Type	JW TEAMMATE RESP	CONSTRUCTION MATERIAL	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-11	Mineral Spirits Dip Tank - Hot Mill Roll Shop, Central	Mineral Spirits	Open Container	David Sitarski	Steel	Manual Visual	1	250	P	Puncture	250 gal in 30 minutes	Storm water ditches to outfalls	Totes/Drums	Y	Plant Floor Area
	IM-07	I-Mill Oil Room	Rolling Oil Clean Tank	Tank	Mark Smith	Steel	Manual Visual	1	10000	P, E (20)	Tank Failure	10000 gal in one hour	Storm water ditches to Outfalls	Totes/Drums	Y	26000
	HW-01	Old Coating Room	Floor Cleaner, Isopropyl Alcohol, Mineral Spirits, Universal Waste (used bulbs and batteries), Hazardous Waste (lab waste, waste paint, broken bulbs)	Bulk Storage (Drums)	Jason Hutto	Metal/Plastic Drum, Steel Tote	Manual Visual	1	Mineral Spirit Totes: 5000 gal	P	Tote/Drum Puncture	250 gallons in 30 minutes	Storm drains to Outfalls	Manual	Y	Plant Floor Area
	IM-01	I-Mill Oil Room	Rolling Oil Dirty Tank	Tank	Mark Smith	Steel	Manual Visual	1	10000	P, E (20)	Tank Failure	10000 gal in one hour	Storm water ditches to Outfalls	Transfer from Indoor Sump	Y	26000
	IM-02	I-Mill Cooling Tower	FS-Lubrilam S40L Oil in Tube Nest		Mark Smith	Steel	Manual Visual	3	250	P	Leak	250 gal in 30 minutes	Storm water ditches to Outfalls	Totes/Drums	Y	26000
	IM-03	I-Mill Oil Room	Oily Diatomaceous Earth	Tank	Mark Smith	Steel	Manual Visual	1	250	P	Drum puncture	Local Cleanup of oily solids	Local Cleanup of oily solids	Manual	Y	26000
	IM-04	I-Mill Oil Room	Hydraulic Oil	Processing Equipment	Mark Smith	Steel	Manual Visual	1	150	P	Tank Failure	150 gal in 30 minutes	Storm water ditches to Outfalls	Totes/Drums	Y	26000
	KM-01	K-Mill Oil Room	Rolling Oil Clean Tank	Tank	Mark Smith	Steel	Manual Visual	1	5000	P	Tank Failure	5000 gal in 30 minutes	Storm water ditches to Outfalls	Totes	Y	20000
	KM-02	K-Mill Oil Room	Rolling Oil Dirty Tank	Tank	Mark Smith	Steel	Manual Visual	1	5000	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	Rolling Oil Sump Pit	Control Measure	Mark Smith	Steel lined concrete pit in tight clay soil	External Sight Gauge	1	20000	P, E (20)	Overflow	n/a	Storm water ditches to Outfalls	In-room drainage	n/a	n/a

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	KM-04	K-Mill Oil Room	FS-Lubrilam S40L Oil in Tube Nest	Processing Equipment	Mark Smith	Steel	Manual Visual	3	250	P	Tote Puncture	250 gal in 30 minutes	Storm water ditches to Outfalls	Totes	Y	20000
	KM-05	K-Mill Oil Room	Oily Diatomaceous Earth	Tank	Mark Smith	Steel	Manual Visual	1	250	P	Drum Puncture	Local Cleanup of oily solids	Local Cleanup of oily solids	Manual	Y	20000
	KM-06	K-Mill Oil Room	Oily Diatomaceous Earth	Tank	Mark Smith	Steel	Manual Visual	1	250	P	Drum Puncture	Local Cleanup of oily solids	Local Cleanup of oily solids	Manual	Y	20000
	KM-07	K-Mill Oil Room	Hydraulic Oil	Tank	Mark Smith	Steel	Manual Visual	1	500	P	Tote/Drum Puncture	500 gal in 30 minutes	Storm water ditches to Outfalls	Totes/Drums	Y	20000
	KM-08	Tank Farm	Dirty Rolling Oil	Tank	Mark Smith	Steel	Manual Visual	1	450	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	Additive - AL 116	Bulk Storage (Totes)	Mark Smith	Stainless Steel	Manual Visual	1	450	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	Dirty Amp Wash	Bulk Storage (Totes)	Mark Smith	Plastic Totes	Manual Visual	1	5 @ 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	Additive - AL 116	Bulk Storage (Totes)	Mark Smith	Stainless Steel	Manual Visual	1	Many @ 450	P	Tote Puncture	450 gal in 30 minutes	Storm water ditches to Outfalls	Totes/Drums	n/a	n/a
		Oil Control Room.	Contains Oil distillation columns and process equipment.	Control Measure	Mark Smith	Concrete	n/a	n/a	No Storage, In-Process Fluids Only	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	KM/IM-01	Oil Control Room, Clean Oil Tank	Clean Oil	Tank	Mark Smith	Stainless Steel	Manual Visual	1	550	P	Tote Puncture	350 Gallons in 30 minutes	Storm water ditches to outfalls	N/A	n/a	Floor Area Sufficient
	MP-001	Adjacent to Compressor Room	Mop Water	Tank	Mark Smith	Steel	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	Mineral Spirits	Open Container	Mark Smith	Steel	Manual Visual	1	250	P	Puncture	250 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a

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	TF-01	K-Mill Tank Farm	Distilled FS-Lubrilam S40L	Tank	Mark Smith	Steel	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	Virgin FS-Lubrilam S40L	Tank	Mark Smith	Steel	External Sight Gauge	1	15000	P, E (20)	Tank Failure	15000 gal in one hour	Storm water ditches to Outfalls	Tanker	Y	26020
	TF-03	K-Mill Tank Farm	Wastewater	Tank	Mark Smith	Steel	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	Wastewater	Tank	Mark Smith	Steel	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	Wastewater	Tank	Mark Smith	Steel	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	Used FS-Lubrilam S40L	Tank	Mark Smith	Steel	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-07	K-Mill Tank Farm	Wastewater	Tank	Mark Smith	Steel	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	Virgin FS-Lubrilam S40L	Tank	Mark Smith	Steel	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	Diesel	Tank	Mark Smith (No Longer Used and Empty)	Steel	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	Distillation Unit, Distilled FS-Lubrilam S40L	Tank	Mark Smith	Steel	Manual Visual	1	500	P	Equipment Puncture	500 gal in 30 minutes	Storm water ditches to Outfalls	Tote	Y	7888
	TSA-01	In-Process TL Tote Storage, West of TL3	Mineral Spirits	Bulk Storage (Totes)	Jason Hutto	Stainless Steel	Manual Visual	1	8-12 @ 250	P	Tote Puncture	250 Gallons in 30 minutes	Storm water ditches to Outfalls	na	Y	Plant Floor Area
	TSA-03	Tote Storage Area, Adjacent to Tension Leveler 1	Clean Mineral Spirits, Dirty Amp Wash	Bulk Storage (Totes)	Jason Hutto	Stainless Steel	Manual Visual	1	2 @ 250	P	Tote Puncture	250 Gallons in 30 minutes	Storm water ditches to Outfalls	na	Y	Plant Floor Area

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	TSA-04	Tote Storage Area, Adjacent to Tension Leveler 2	Clean Mineral Spirits, Dirty Amp Wash	Bulk Storage (Totes)	Jason Hutto	Stainless Steel	Manual Visual	1	2 @ 250	P	Tote Puncture	250 Gallons in 30 minutes	Storm water ditches to Outfalls	na	Y	Plant Floor Area
	TSA-05	Tote Storage Area, Adjacent to Tension Leveler 3	Clean Mineral Spirits, Dirty Amp Wash	Bulk Storage (Totes)	Jason Hutto	Stainless Steel	Manual Visual	1	2 @ 250	P	Tote Puncture	250 Gallons in 30 minutes	Storm water ditches to Outfalls	na	Y	Plant Floor Area
	TSA-06	Tote Storage Area, South of Oil Room & K-Mill	Mineral Spirits & Amp Wash	Bulk Storage (Totes)	Mark Smith	Plastic Totes	Manual Visual	1	250	P	n/a	2500 gal in 30 minutes	Storm water ditches to Outfalls	na	Y	26020
	CT-01	Rolling Oil Cooling Tower	Rolling Oil	Processing Equipment		Steel	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	Rolling Oil	Processing Equipment		Steel	n/a	n/a	n/a	n/a	n/a	n/a	Storm water ditches to Outfalls	n/a	n/a	n/a
	FO-01	Diesel Storage Tank, South of Boltermaker Melting Building, Installed 2021	Diesel	Tank		Steel	Manual Visual	1	2000	P	Tank Puncture	2000 gal in 30 minutes	Storm water ditches to Outfalls	Manual	Y	Double-Walled
	FO-02	Diesel Storage Tank, Adjacent to Shipping Area, Installed 2021	Diesel	Tank		Steel	Manual Visual	1	1000	P	Tank Puncture	1000 gal in 30 minutes	Storm water ditches to Outfalls	Manual	Y	Double-Walled

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	TRF-01	T-1 located in the I-mill Motor Room	Silicone Fluid	Transformer		Steel	Manual Visual	1	185 P	Puncture	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-02	South of K-Mill Building, Near EG-001	Oil	Transformer		Steel	Manual Visual	1	629 P	Puncture	Puncture	629 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	TRF-03	South and adjacent to TL-1	Oil	Transformer		Steel	Manual Visual	1	185 P	Puncture	Puncture	185 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	TRF-04	Transformer, Adjacent to and East of TL1	Silicone Fluid	Transformer		Steel	Manual Visual	1	185 P	Puncture	Puncture	185 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	Plant Floor Area
	TRF-05	Transformer, Adjacent to CM/FM Oil Room off of Alley entrance	Dielectric Mineral Oil	Transformer		Steel	Manual Visual	1	185 P	Puncture	Puncture	185 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	TRF-06	South of Fork Truck Shop, Outside of Legacy Casting Building, Serial PDA-0039	Oil	Transformer		Steel	Manual Visual	1	322 P	Puncture	Puncture	322 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	TRF-07	East of Fabrication Shop	Oil	Transformer		Steel	Manual Visual	1	455 P	Puncture	Puncture	455 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	TRF-08	North of Dross Accumulation Building	Vegetable Oil, EnviroTemp FR3	Transformer		Steel	Manual Visual	1	220 P	Puncture	Puncture	220 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	TRF-09	East of Shipping Building, Near Pond C-2	Oil	Transformer		Steel	Manual Visual	1	446 P	Puncture	Puncture	446 gal in 30 minutes	Stormwater runoff to Pond C2	Manual	N	n/a
	TRF-10	I Mill Motor Room	Dielectric Mineral Oil	Transformer		Steel	Manual Visual	1	185 P	Puncture	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-11	T-7 located in the I-mill Motor Room	Silicone Fluid	Transformer		Steel	Manual Visual	1	155 P	Puncture	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-12	T-8 located in the I-mill Motor Room	Silicone Fluid	Transformer		Steel	Manual Visual	1	308 P	Puncture	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-13	T-9 located in the I-mill Motor Room	Silicone Fluid	Transformer		Steel	Manual Visual	1	172 P	Puncture	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-14	K-Mill	Silicone Fluid	Transformer		Steel	Manual Visual	1	213 P	Puncture	Puncture		Storm water ditches to Outfalls	Manual	N	n/a

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	TRF-15	East of Tension Leveler 3	Silicone Fluid	Transformer		Steel	Manual Visual	1	352	P	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-16	T-13 in I-Mill Motor Room	Silicone Fluid	Transformer		Steel	Manual Visual	1	185	P	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-17	T-3 located near Tension Levelers and Annealing	Silicone Fluid	Transformer		Steel	Manual Visual	1	185	P	Puncture		Storm water ditches to Outfalls	Manual	N	n/a
	TRF-18	East of Heavy Oil Scrubber (WS-2) Base	Mineral Oil	Transformer		Steel	Manual Visual	1	380	P	Puncture	380 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a
	TRF-SC	Santee Cooper Electrical Substation/Transformers Next to Crane Shop	Dielectric Mineral Oil	Transformer		Steel	Manual Visual	1	Approx. 455	P	Puncture	455 gal in 30 minutes	Storm water ditches to Outfalls	Manual	N	n/a

APPENDIX M

Contractor Owned Tank Inventory