May 1980?

SPILL PLAN

The following plan is submitted in compliance with the requirements as detailed in KAR 28-29-47 in furtherance of the application for a permit for the operation of a hazardous waste storage area.

The North site of the operation for Reid Supply Co. has been outlined and diagramed elsewhere in the application. An additional diagram indicating various points relating to the "Spill Plan" is attached hereto. The North site of the Reid Supply Co. operation is, by some standards, a small one consisting of only three to four full time employees. Those employees have all been trained to deal with hazardous waste and the possibility of fire as indicated herein.

This "Spill Plan" will follow in form those requirements numbered (1) through (6) set out at KAR 28-29-47 dealing with a spill plan.

(1) The attached diagram as well as the "Plot Plan" and "Flow Plan" submitted herewith accurately sets forth the position and size of all storage tanks on the North site. All tanks indicated herein are made of various guage steel depending, of course, upon the size and purpose. Various sections of storage tanks are connected with steel pipe ranging in size from ½" to approximately 3" to 4" pipe depending again upon the amount and type of material flowing through them. Any tank or valve or coupling would, conceivably, be a potential source of spillage or leakage. For this reason, all such couplings and valaves are

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routinely inspected by employees on the site who are trained in that regard by the man in charge, Mr. Floyd Trammell, who has been in charge of the North site for over 20 years.

Tank "F" is surrounded by a pit which would contain the majority of the material in tank "F" in the event of a total spill. Tank "A" is also surrounded by a pit consisting of approximately 1/8" steel and approximately 4' x 6' in size. This spill pit would, again, accommodate most of what would be in tank "A" at any given time. The "Flow Plan" indicates the manner in which wastes are transferred between these tanks. This is accomplised either by means of a pump which puts out very little pressure or simply by gravity which of course, in this case produces no measurable pressure at all. The lines from the bulk storage tanks numbered 1 through 16 feed into building "J" where 55 gallon drums are filled for shipment. All fittings at this filling area are brass to minimize the risk of sparks.

(2) There has been no formal personnel training or scheduled meetings to train employees and personnel. As indicated above, Mr. Floyd Trammell has been at the North Reid site a number of years and personally instructs and supervises the small number of employees in the operation of the site.

Each employee is, therefore, well aware of the exact position of fire extinguishers, hoses and chemicals designed to neutralize any spillage. This would be an ongoing training process.

(3) Continued monitoring by all employees would, hopefully, insure against spillage and leakage. Valves and couplings are routinely inspected and repaired if indicated. The exact procedure to be followed in the event of a spill or leak would, of course, depend upon the size of the spill and type of waste being expelled. The spill tanks would accommodate much hazardous waste which could then be pumped out and back into other secure storage facilities on the site. Of course any residue remaining upon any concrete floor would have to be mopped up by hand or washed out with hoses.

(4) Each employee is aware of the location of clean up equipment as well as fire fighting equipment in the event of a spillage or leakage of hazardous waste. In the event of such a spillage, the procedure is for each employee to cease whatever work he is doing immediately and assist in the clean up operation. Fortunatly, there have been very few spillages or leakages at the North plant site. Water would be used to remove the spillage from building and to neutralize and dilute any hazardous waste. Available tanks would be used to pump any spilled waste into. In the event that water could not be easily used to disperse and clean up any

spilled waste, other materials are available at the North site to neutralize any hazardous waste until the same can be cleaned up and either stored or distilled.

(5) In the event of a fire, each employee is aware of the location of all fire extinguishers which are of course routinely inspected and maintained. Each fire extinguisher is suited for the particular type of fire which would occur in the building in which the fire extinguisher is located, most being equiped to handle class A, B and C fires. Additionally, there are a number of water outlets and hoses available with nozzles to fight any possible fire. Of course, the fire department would be called in the event of a fire. Needless to say there is no smoking allowed any where on the Reid Supply Co. North site which is strictly enforced.

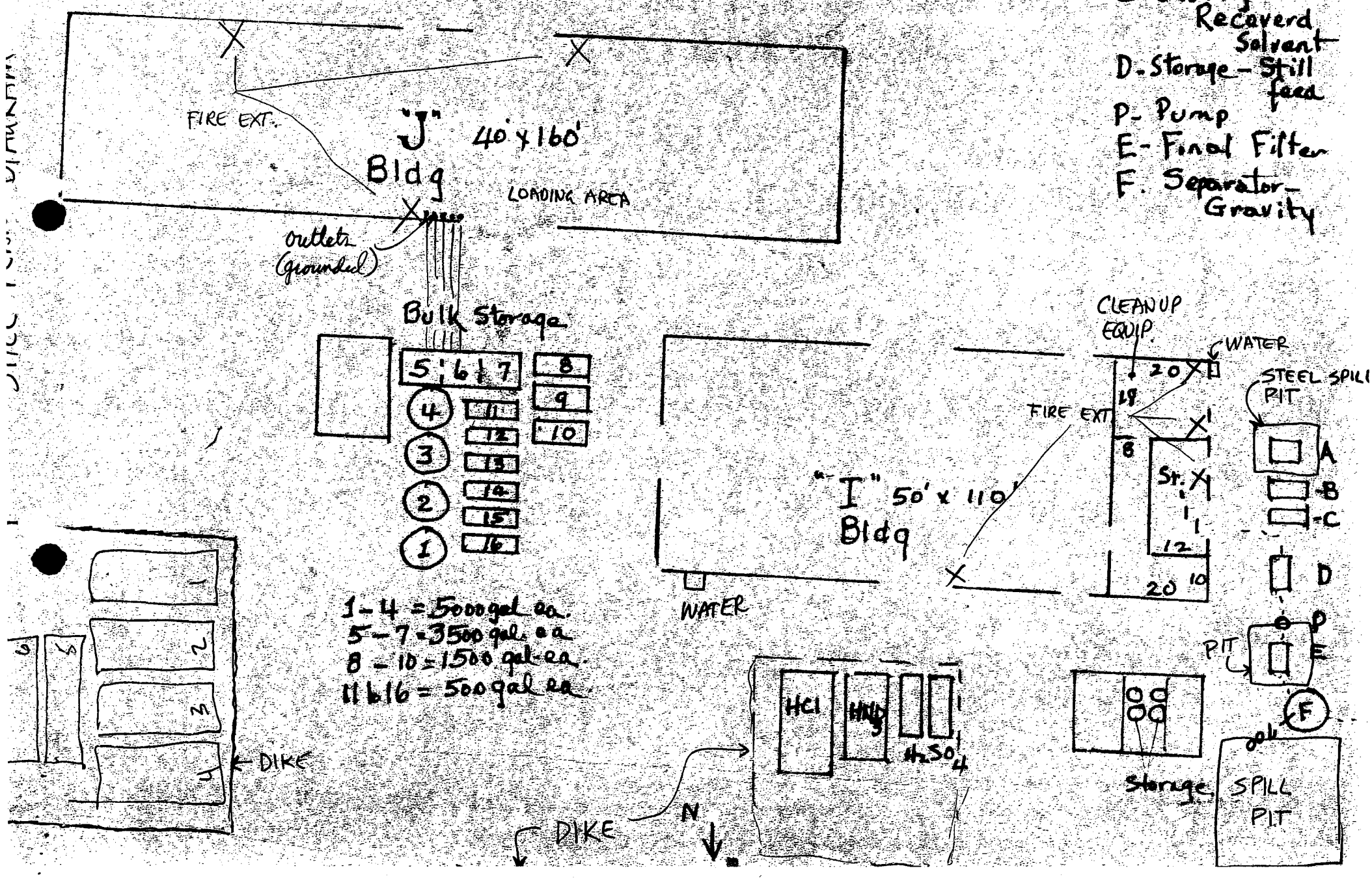
(6) The locations of fire, safety and clean up equipment consisting mainly of fire extinguishers, water supplies and clean up equipment consisting of mops, shovels, etc... is indicated on the attached diagram and each employee is well aware of it's location. Needless to say, the number of and type of fire extinguishers have been approved and satisfy the requirements of the City as well as insurance requirements.

Additionally, it should be noted that explosion proof electrical equipment, consisting of lights, motors and switches are routinely used throughout the Reid Supply North site in order to minimize the

possibility of sparks or fire. Interior rooms are vented to minimise build up of fumes.

This plan shall be updated as necessary and as required by KAR 28-29-47 and shall be available for inspection by the Department at the storage facility as required.

Additionally, a ditch runs along the North edge of the Reid Supply site, on city property. Recently the city blocked this drainage ditch so that any spillage from either Reid Supply's tanks or oil spillage from the refineries in the area would be blocked before it could reach the storm drainage ditch running North and South through the city. The city has inspected this ditch frequently for evidence of spillage.

East Lot.

Tanks
A - Still feed
B - Storage
C - Storage Recaverd Solvent
D - Storage - Still feed
P - Pump
E - Final Filter
F. Separator - Gravity