956727

REGION 5 SUPERFUND SITE RECORDS CLASSIFICATION FORM **Submittal Date** 6/6/16

THIS FORM MUST ACCOMPANY ELECTRONIC AND PAPER DOCUMENT SUBMISSIONS TO THE RECORDS CENTER

Submitted By James Entzminger **Phone#** 312-886-4062

SITE / CASE NAME: United States Steel Corporation f/k/a Double Eagle Steel Coating Company

CERCLA (9-digit) / Grant ID #: _____ **Spill ID#** _____ **State:** IN **OU:** ___

Attorney: Robert H. Smith **RPM / OSC:** _____

Date(s) of documents: 8/3/15 – 5/27/16 **Type(s) of documents:** Enforcement

Number of documents / boxes submitted with this form: 1 File Folder

PRIORITY: ✓ LOW ____ MEDIUM ____ RUSH

SITE SPECIFICITY (select any that apply):

EPCRA ✓
BROWNFIELDS ____
COST RECOVERY ____
FEDERAL FACILITIES ____
ICTS REPORTS / SIGNOFF ____

REMEDIAL (NPL) ____
REMOVAL ____
SITE ASSESSMENT ____
SFD ALTERNATIVE SITE ____
OTHER (specify): ____

received JUN 06 2016

Is the submission to be included in an Administrative Record? ✓ **Yes** ___ **No**

RELEASE STATUS (select type):

Releasable (select document):

Notice Letter (Signed) ____
POLREP ____
ROD / ESD (Signed) ____

Five Year Review ____
Action Memo (Redacted) ____
Consent Decree (Signed) ____

Administrative Order / AOC (signed) ✓
Public Comment Submittals/Responses ___
RI/FS Final Reports/Technical docs ____

OTHER___: Identification as "Other" requires OSC, RPM or Attorney signature authorizing release.*

ATTORNEY/OSC/RPM ____ Date ____ / ____ / ____

Non-Releasable (select type):

Confidential Business Information (CBI)__ Submit directly to SFD Records Manager Todd Quesada (6-4465)

Attorney Work Product ____
Attorney-Client Communication ✓
Deliberative Process ____

Enforcement/Settlement Confidential ✓
OGC OK ____
Privacy Act ____

SCAN / TRANSFER OF DOCUMENTS (SEMS Document Management System / SDMS):

Scan / TRANSFER into SDMS? ___ **YES** ✓ **NO**

DISPOSITION OF HARD COPY DOCUMENT SUBMISSIONS (Select one):

Unreturned hard copy submissions that are not subject to a litigation hold and are scanned into SDMS will be sent to the National Archives / Federal Records Center (off-site storage) unless a justification is provided to retain the hard copy in the Region 5 Superfund Records Center in addition to the scanned version.

✓ **Send hard copy to FRC after scanning into SDMS**
____ **Retain hard copy at the SFD Records Center**
Justification: ____
____ **Return to Submitter** ____ **N/A (electronic submission)**

***Submissions marked as "Other" without a signature will be tagged as non-releasable by default in SDMS.**

Please direct any questions regarding this form to Todd Quesada, SFD Records Manager at 6-4465.

(b) (5) Deliberative Process

[redacted]

Envirofacts

FRS Facility Detail Report

FRS

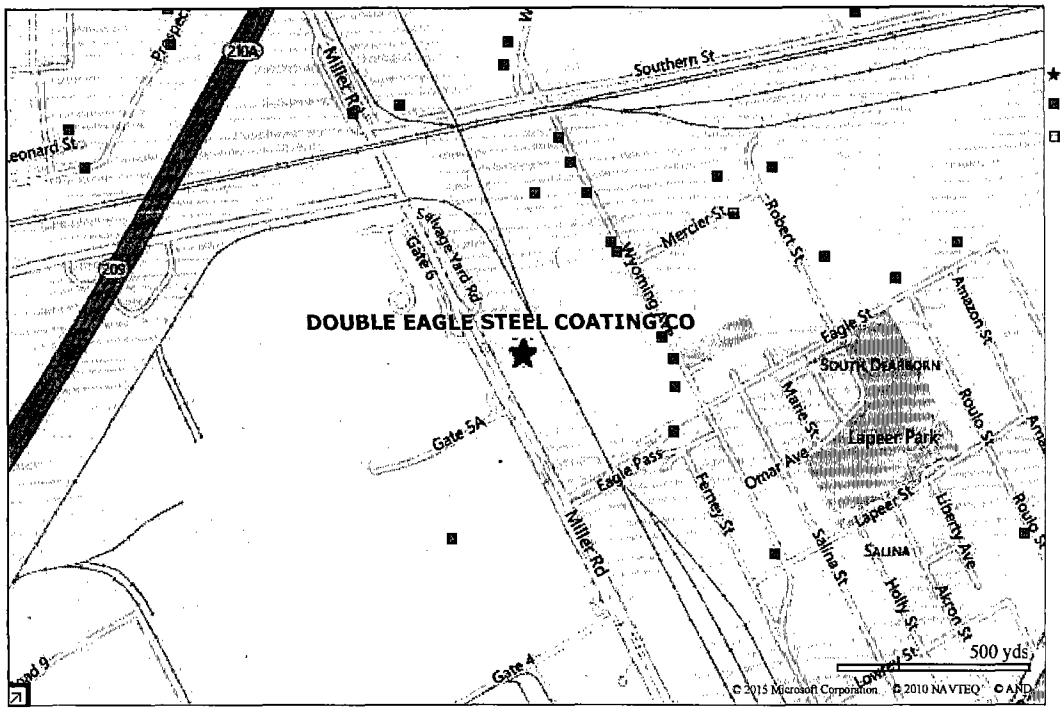
DOUBLE EAGLE STEEL COATING CO

3000 MILLER ROAD
DEARBORN, MI 48120-1400
EPA Registry Id: 110000405598

Facilty Registry Service Links

- Search
  - FRS Facility Query
  - FRS EZ Search
  - Organization Search
- FRS Physical Data Model
- FRS Geospatial Model
- Contact Us
- Facility Registry Service (FRS) Home

Report an Error



Legend

- ★ Selected Facility
- ■ EPA Facility of Interest
- □ State/Tribe Facility of Interest

The facility locations displayed come from the FRS Spatial Coordinates tables. They are the best representative locations for the displayed facilities based on the accuracy of the collection method and quality assurance checks performed against each location. The North American Datum of 1983 is used to display all coordinates.

Environmental Interests

Information System	System Facility Name	Information System Id/Report Link	Environmental Interest Type	Data Source	Last Updated Date	Supplemental Environmental Interests:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM	DOUBLE EAGLE STEEL COATING CO	MID981092190	LQG (Y)	RCRAINFO	09/26/2014	
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (ICIS-NPDES)	DOUBLE EAGEL STEEL COATING CO	MI0044415	NPDES MAJOR	ICIS	09/30/2013	ICIS-ENFORCEMENT/COMPLIANCE ACTIVITY
INTEGRATED COMPLIANCE INFORMATION SYSTEM	DOUBLE EAGLE STEEL COATING CO	6680421	ENFORCEMENT/COMPLIANCE ACTIVITY	ICIS	02/13/2006	
TOXIC RELEASE INVENTORY SYSTEM	DOUBLE EAGLE STEEL COATING CO	48120DBLGL3000M	TRI REPORTER	TRI REPORTING FORM	06/23/2015	
TOXIC SUBSTANCES CONTROL ACT	DOUBLE EAGLE STEEL COATING CO	100605557	TSCA SUBMITTER	TSCA	08/13/2012	
AIR FACILITY SYSTEM	DOUBLE EAGLE STEEL	2616303658	AIR MINOR (OPERATING)	AIRS/AFS	04/01/2014	ICIS-ENFORCEMENT/COMPLIANCE ACTIVITY
BIENNIAL REPORTERS	DOUBLE EAGLE STEEL COATING CO	MID981092190	HAZARDOUS WASTE BIENNIAL REPORTER	RCRAINFO	12/31/2013	
TOXIC SUBSTANCES CONTROL ACT	DOUBLE EAGLE STEEL COATING CO	TSCA7526	TSCA SUBMITTER	TSCA		

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY INFORMATION SYSTEM	DOUBLE EAGLE STEEL ER	MIN000508261	SUPERFUND (NON-NPL)	CERCLIS		
EMISSION INVENTORY SYSTEM (EIS)	DOUBLE EAGLE STEEL COATING CO	6176211	AIR EMISSIONS CLASSIFICATION UNKNOWN	EIS	07/09/0013	
INTEGRATED COMPLIANCE INFORMATION SYSTEM	DOUBLE EAGLE STEEL COATING CO	6680421	FORMAL ENFORCEMENT ACTION	ICIS	06/25/2009	

Additional EPA Reports: MyEnvironment Enforcement and Compliance Site Demographics Facility Coordinates Viewer Environmental Justice Map Viewer Watershed Report

Standard Industrial Classification Codes (SIC)

Data Source	SIC Code	Description	Primary
ICIS	3312	STEEL WORKS, BLAST FURNACES (INCLUDING COKE OVENS), AND ROLLING MILLS	
ICIS	3479	COATING, ENGRAVING, AND ALLIED SERVICES, NOT ELSEWHERE CLASSIFIED	
AIRS/AFS	3313	ELECTROMETALLURGICAL PRODUCTS, EXCEPT STEEL	
NPDES	3479	COATING, ENGRAVING, AND ALLIED SERVICES, NOT ELSEWHERE CLASSIFIED	

National Industry Classification System Codes (NAICS)

Data Source	NAICS Code	Description	Primary
EIS	332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS.	
RCRAINFO	332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS.	
AIRS/AFS	331112	ELECTROMETALLURGICAL FERROALLOY PRODUCT MANUFACTURING.	
TRIS	332812	METAL COATING, ENGRAVING (EXCEPT JEWELRY AND SILVERWARE), AND ALLIED SERVICES TO MANUFACTURERS.	

Facility Codes and Flags

EPA Region:	05
Duns Number:	
Congressional District Number:	12
Legislative District Number:	
HUC Code/Watershed:	04090004 / DETROIT
US Mexico Border Indicator:	
Federal Facility:	NO
Tribal Land:	NO

Facility Mailing Addresses

Affiliation Type	Delivery Point	City Name	State	Postal Code	Information System
REGULATORY CONTACT	3000 MILLER ROAD	DEARBORN	MI	481201400	RCRAINFO
MAILING ADDRESS	3000 MILLER RD	DEARBORN	MI	48120	NPDES
FACILITY MAILING ADDRESS	3000 MILLER ROAD	DEARBORN	MI	481201400	RCRAINFO
OWNER	3000 MILLER ROAD	DEARBORN	MI	481201400	RCRAINFO
FACILITY MAILING ADDRESS	3000 MILLER RD	DEARBORN	MI	48120	TRIS
PARENT COMPANY	14661 ROTUNDA DRIVE	DEARBORN	MI	48120-1699	TSCA
OWNER	3000 MILLER RD	DEARBORN	MI	48120	NPDES

Alternative Names

Alternative Name	Source of Data
DOUBLE EAGLE STEEL ER	CERCLIS
DOUBLE EAGEL STEEL COATING CO	NPDES
DOUBLE EAGLE STEEL	AIRS/AFS

Contacts

Affiliation Type	Full Name	Office Phone	Information System	Mailing Address
PRIMARY CONTACT	CHRISTOPHER MCBEE	3133631902	ICIS	
REGULATORY CONTACT	JASON POND	3132039810	RCRAINFO	
SITE CONTACT	DAVID KRUSZKA	3132039801	ICIS	
PUBLIC CONTACT	DAVID HOWARD	3132039810	TRIS	
REGULATORY CONTACT	STEVEN F FORD	3132039836	RCRAINFO	View
REGULATORY CONTACT	STEVEN F FORD	3132039836	RCRAINFO	View
TECHNICAL CONTACT	MR. JASON POND		TSCA	

Organizations

Affiliation Type	Name	DUNS Number	Information System	Mailing Address
OWNER/OPERATOR		131430183	TRIS	
OWNER	DOUBLE EAGLE STEEL COATING COMPANY		RCRAINFO	View
MAILING ADDRESS	DOUBLE EAGLE STEEL COATING CO		NPDES	View
OWNER	DOUBLE EAGLE STEEL COATING COMPANY		RCRAINFO	View
OWNER	ROUGE STEEL CO-USX CORP		NPDES	View
OWNER/OPERATOR		131430183	AIRS/AFS	
OPERATOR	DOUBLE EAGLE STEEL COATING COMPANY		RCRAINFO	
PARENT COMPANY	SEVERSTAL NORTH AMERICA INC		TSCA	View
OWNER	ROUGE STEEL CO-USX CORP		NPDES	View
PARENT COMPANY	DOUBLE EAGLE STEEL COATING CO	131430183	TRIS	
MAILING ADDRESS	DOUBLE EAGLE STEEL COATING CO		NPDES	View

Query executed on: AUG-03-2015

Additional information for CERCLIS or TRI sites:

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EXIT EPA

Envirofacts
Form R

TRI

FORM R REPORTS

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<< Return

As a result of the TRI Reporting Forms Modification Rule, beginning in reporting year 2005, the Toxics Release Inventory Program is no longer collecting latitude and longitude data or EPA program ID data (Including Resource Conservation and Recovery Act (RCRA) IDs, National Pollutant Discharge Elimination System (NPDES) IDs AND Underground Injection Code (UIC) IDs) via the FORM R or FORM A Certification Statement. However, this data will still be made available to TRI data users and will be included in TRI data Reports. For those Reports, this data will be obtained from the Facility Registry System (FRS). Latitude and longitude coordinates used to represent TRI facilities are chosen from the FRS using the "Pick Best" Process. Primary permitting systems supply FRS with the program IDs that are used to represent TRI facilities. The FRS data that are being used to represent this facility are:

Reference Point/Description	Latitude	Longitude	Collection Method	Accuracy Value
CENTER OF A FACILITY OR STATION	42.31279	-83.15822	ADDRESS MATCHING-HOUSE NUMBER	30

RCRA ID NUMBER
MID981092190

NPDES PERMIT NUMBER
MI0044415

UIC ID NUMBER
NO DATA

To correct the FRS latitude, longitude or program ID values click on the "Report an Error" button in the top right corner of this page. Facilities wishing to correct other data elements with the FORM R or FORM A should refer to How to Revise TRI Data.
For more information, see *Collection of Latitude, Longitude and Program ID Data Has Been Discontinued*.

PART I. FACILITY IDENTIFICATION INFORMATION *(FORM R)*

DOCUMENT CONTROL NUMBER: 1314212615304

Facility Registry System ID: 110000405598

Section 1. Reporting Year

Reporting Year: 2014

Section 2. Trade Secret Information

2.1 Trade Secret: NO

2.2 Sanitized Copy: Unsanitized

Section 3. Certification

CERTIFYING OFFICIAL'S NAME	CERTIFYING OFFICIAL'S TITLE	CERTIFYING OFFICIAL'S SIGNATURE	DATE SIGNED
THEODORE LUCIOW	PLANT MANAGER	Electronic	23-JUN-15

Section 4. Facility Identification

TRI Facility ID: 48120DBLGL3000M

4.1 Facility Name and Address.

Facility Information

NAME	STREET	CITY	COUNTY	STATE	ZIP CODE
DOUBLE EAGLE STEEL COATING CO	3000 MILLER RD	DEARBORN	WAYNE	MI	48120

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BIA Tribal Code	Tribe
NO DATA	NO DATA

Mailing Information

NAME	STREET	CITY	STATE	ZIP CODE
DOUBLE EAGLE STEEL COATING CO	3000 MILLER RD	DEARBORN	MI	48120-

PROVINCE	COUNTRY (NON - US)
NO DATA	NO DATA

4.2 Facility Classification

ENTIRE FACILITY	PARTIAL FACILITY	FEDERAL FACILITY	GOCO FACILITY
YES	NO	NO	NO

4.3 Technical Contact

Not Available to the Public as this information is only for Intranet.

4.4 Public Contact

NAME	PHONE	EXTENSION
STEVE FORD	3132039836	No Data

4.5 NAICS Codes

NAICS CODE	PRIMARY	NAICS CODE DESCRIPTION
332812	YES	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

4.7 Dun Numbers

DUNS NUMBER

5. Parent Company Information

Parent Company Name: DOUBLE EAGLE STEEL COATING CO

Parent Company DUNS Number: 131430183

PART II. CHEMICAL - SPECIFIC INFORMATION

DOCUMENT CONTROL NUMBER: 1314212615304

Section 1. Toxic Chemical Identity

1.1 CAS Number: N420

1.2 Toxic Chemical or Chemical Category Name: LEAD COMPOUNDS

1.3 Generic Chemical Name: NA

1.4 Distribution of Each Member of the Dioxin and Dioxin like Compounds Category

NA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
NO																	

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Section 2. Mixture Component Identity

2.1 Supplier Provided Generic Chemical Name: NA

Section 3. Activities and Uses of the Toxic Chemical

3.1 Manufacture the Toxic Chemical:

Produce: YES	Import: NO	On-Site Use/Processing: NO
Sale/Distribution: NO	Byproduct: YES	Impurity: YES

3.2 Process the Toxic Chemical:

Reactant: NO	Formulation Component: NO	Article Component: NO	Repackaging: NO	Impurity: YES

3.3 Otherwise Use the Toxic Chemical:

Chemical Processing Aid: NO	Manufacturing Aid: NO	Ancillary or Other Use: NO

Section 4. Maximum Amount of the Toxic Chemical Onsite During the Calendar Year

Maximum Chemical Amount: 0 to 99

Section 5. Quantity of the Toxic Chemical Entering each Environmental Medium Onsite

5.1 Fugitive or Non-Point Air Emissions

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
NO	.04	Pounds	E1 - Emission Factor, Published

5.2 Stack or Point Air Emissions

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
NO	.09	Pounds	E1 - Emission Factor, Published

5.3 Discharges to Receiving Streams or Water Bodies

NA	STREAM/WATER BODY NAME	REACH Code	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE	% FROM STORMWATER
NO	ROUGE RIVER		0	Pounds	M2 - Monitoring, Periodic/Random	0

5.4-5.5 Disposal to Land Onsite

5.4.1 Underground Injection Onsite to Class I Wells.

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
YES			

5.4.2 Underground Injection Onsite to Class II-V Wells.

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
YES			

5.5 Disposal to Land Onsite

5.5.1A RCRA Subtitle C Landfills

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
YES			

5.5.1B Other Landfills

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
YES			

5.5.2 Land Treatment/Application Farming

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
YES			

5.5.3A RCRA Subtitle C Surface Impoundments

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
YES			

5.5.3B Other Surface Impoundments

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
YES			

5.5.4 Other Disposal

NA	TOTAL RELEASE (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
NO	0	Pounds	O - Other Approaches

Section 6. Transfers of the Toxic Chemical in Wastes to Off-Site Locations

6.1 Discharges to Publicly Owned Treatment Works (POTWs)

1 - NAME:	ADDRESS:
CITY:	STATE:
COUNTY:	ZIP CODE:

TOTAL TRANSFERS (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE
NO DATA		NO DATA

6.2 Transfers to other Off-Site Locations

1 RCRA Number: MID074259565	Parent Company Controlled: NO
Name: US ECOLOGY (DYNECOL INC)	Address: 6520 GEORGIA
City: DETROIT	State: MI

County: WAYNE	Zip Code: 48211
Country Code (Non - US):	Province:

OFFSITE AMOUNT SEQUENCE	TOTAL TRANSFERS (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE	WASTE MANAGEMENT TYPE
1	.8	Pounds	M2 - Monitoring, Periodic/Random	M62 - Wastewater Treatment(Excluding POTW)-Metals and Metal Compounds only

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2 RCRA Number: NED000610550	Parent Company Controlled: NO
Name: AGRIUM ADVANCED TECHNOLOGIES INC & LOVELAND PRODUCTS INC	Address: 71025 569TH AVE.
City: FAIRBURY	State: NE
County: JEFFERSON	Zip Code: 68352
Country Code (Non - US):	Province:

OFFSITE AMOUNT SEQUENCE	TOTAL TRANSFERS (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE	WASTE MANAGEMENT TYPE
1	21.07	Pounds	M2 - Monitoring, Periodic/Random	M26 - Other Reuse or Recovery

3 RCRA Number: NA	Parent Company Controlled: NO
Name: MAC CASTINGS	Address: 13600 GIRARDIN STREET
City: DETROIT	State: MI
County: WAYNE	Zip Code: 48212
Country Code (Non - US):	Province:

OFFSITE AMOUNT SEQUENCE	TOTAL TRANSFERS (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE	WASTE MANAGEMENT TYPE
1	244.86	Pounds	M2 - Monitoring, Periodic/Random	M26 - Other Reuse or Recovery

4 RCRA Number: MID064191471	Parent Company Controlled: NO
Name: ENVIROSOLIDS, L.L.C.	Address: 6011 WYOMING AVENUE
City: DEARBORN	State: MI
County: WAYNE	Zip Code: 48126
Country Code (Non - US):	Province:

OFFSITE AMOUNT SEQUENCE	TOTAL TRANSFERS (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE	WASTE MANAGEMENT TYPE
1	3.28	Pounds	M2 - Monitoring, Periodic/Random	M90 - Other Off-Site Management

5 RCRA Number: MIR000009027	Parent Company Controlled: NO
Name: SAUK TRAIL HILLS DEVELOPMENT	Address: 5011 LILLEY ROAD
City: CANTON TWP	State: MI
County: WAYNE	Zip Code: 48188
Country Code (Non - US):	Province:

OFFSITE AMOUNT SEQUENCE	TOTAL TRANSFERS (per year)	UNIT OF MEASURE	BASIS OF ESTIMATE	WASTE MANAGEMENT TYPE
1	114.68	Pounds	M2 - Monitoring, Periodic/Random	M64 - Other Landfills

Section 7A. On-Site Waste Treatment Methods and Efficiency

7A.1a. Waste Stream: WASTEWATER

7A.1b.	WASTE TREATMENT METHOD(S) SEQUENCE
1	H077 - Other chemical precipitation with or without pre-treatment
2	H123 - Settling or clarification
3	H101 - Sludge treatment and/or dewatering

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7A.1d. Waste Treatment Efficiency Estimate: Greater than 99.99% but less than or equal to 99.9999%

Section 7B. On-Site Energy Recovery Processes

ON SITE ENERGY RECOVERY PROCESSES
NA

Section 7C. On-Site Recycling Processes

ON SITE RECYCLING PROCESSES
NA

Section 8. Source Reduction and Recycling Activities

SECTION	TYPE OF QUANTITY	UNITS	PRIOR YEAR	CURRENT REPORTING YEAR	FOLLOWING YEAR	SECOND FOLLOWING YEAR
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills		NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	Pounds	.22	.13	0	0
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	Pounds	164.5	114.68	110	110
8.1d	Total other off-site disposal or other releases	Pounds	5.73	4.08	4	4
8.2	Quantity Used for Energy Recovery Onsite		NA	NA	NA	NA
8.3	Quantity Used for Energy Recovery Offsite		NA	NA	NA	NA
8.4	Quantity Recycled Onsite		NA	NA	NA	NA
8.5	Quantity Recycled Offsite	Pounds	487.48	265.93	270	270
8.6	Quantity Treated Onsite		NA	NA	NA	NA
8.7	Quantity Treated Offsite		NA	NA	NA	NA

8.8 One-Time Event Release: NA

8.9 Production Ratio ☑ or Activity Ratio ☐ : .68

8.10 Source Reduction Activities

SOURCE REDUCTION ACTIVITIES	METHOD 1	METHOD 2	METHOD 3	ESTIMATED ANNUAL REDUCTION
NA				

8.11 Additional Data Indicator: NO

Revise Search Print Save

Spill Summary Report for NRC Report #1123092

Report Date: 8/3/2015 **Report Time:** 10:32 AM EDT

Region V Hotline Log Entry Information

Data ID: 1805199
Date Of Report: 17-JUL-15 16:03 **NRC #:** 1123092 **State #:** **ERNS #:**
Material Type: Haz **Receiver:** benning
Material / Amount: WASTE WATER (100 GALLON(S));
Location: City: DEARBORN
County: WAYNE
State: MI
Source of Pollution: DOUBLE EAGLE STEEL COATING COMPANY
Water Body: none
State Or EPA Responded: RP conducted cleanup, made repairs
Initial EPA Action: no action
Status: 2 - Closed
URL:

NRC Spill Report

NATIONAL RESPONSE CENTER 1-800-424-8802
GOVERNMENT USE ONLYGOVERNMENT USE ONLY***
Information released to a third party shall comply with any
applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 1123092

INCIDENT DESCRIPTION

*Report taken by: CIV LOTTIE JOHNSON at 16:03 on 17-JUL-15
Incident Type: FIXED
Incident Cause: EQUIPMENT FAILURE
Affected Area:
Incident occurred on 15-JUL-15 at 15:50 local incident
Affected Medium: OTHER / GROUND

(b) (5) Deliberative Process

[redacted]

REPORTING PARTY

Name: STEVEN FORD
Organization: DOUBLE EAGLE STEEL COATING COMPANY
Address: 3000 MILLER ROAD
DEARBORN, MI 48120
Email Address: ford@descc.com

PRIMARY Phone: (313)2039836
Type of Organization: PRIVATE ENTERPRISE

SUSPECTED RESPONSIBLE PARTY

Name: STEVEN FORD
Organization: DOUBLE EAGLE STEEL COATING COMPANY
Address: 3000 MILLER ROAD
DEARBORN, MI 48120
PRIMARY Phone: (313)2039836
Type of Organization: PRIVATE ENTERPRISE

INCIDENT LOCATION

3000 MILLER ROAD County: WAYNE

City: DEARBORN State: MI Zip: 48120

RELEASED MATERIAL(S)

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: WASTE WATER
Qty Released: 100 GALLON(S)

DESCRIPTION OF INCIDENT

CALLER IS REPORTING A DISCHARGE OF WASTE WATER THAT WAS ACIDIC (BELOW A 1.8PH) FROM AN EQUALIZATION LINE DUE TO A PINHOLE CRACK IN THE FIBERGLASS PIPING. CALLER STATED THAT AMOUNT DISCHARGE WAS LESS THAN 100 GALLONS.

INCIDENT DETAILS

Package: NO
Building ID:
Type of Fixed Object: WATER TREATMENT FACILITY
Power Generating Facility: NO
Generating Capacity:
Type of Fuel:
NPDES:
NPDES Compliance: UNKNOWN

IMPACT

Fire Involved: NO Fire Extinguished: UNKNOWN

INJURIES:	NO	Hospitalized:	Empl/Crew:	Passenger:
FATALITIES:	NO	Empl/Crew:	Passenger:	Occupant:
EVACUATIONS:	NO	Who Evacuated:	Radius/Area:	

Damages: NO

Closure Type		Description of Closure	Hours Closed	Direction of Closure
Air:	N			
Road:	N			Major Artery: N
Waterway:	N			
Track:	N			

Passengers Transferred: NO
Environmental Impact: NO
Media Interest: UNKNOWN Community Impact due to Material:

REMEDIAL ACTIONS

TWO PIGS DEPLOYED, SUCTION HOSE WAS USED TO REMOVE LIQUID FROM GROUND, CLEAN UP IS COMPLETED
Release Secured: YES
Release Rate:
Estimated Release Duration:

WEATHER

Weather: SUNNY, i¿½F

ADDITIONAL AGENCIES NOTIFIED

Federal:
State/Local: PEAS
State/Local On Scene:
State Agency Number:

NOTIFICATIONS BY NRC

CENTERS FOR DISEASE CONTROL (GRASP)
17-JUL-15 16:11 (770)4887100
DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE)
17-JUL-15 16:11 (202)3661863
U.S. EPA V (MAIN OFFICE)
17-JUL-15 16:12 (312)3532318 MR. MARITOTE

FLD INTEL SUPPORT TEAM DETROIT (COMMAND CENTER)
17-JUL-15 16:11 (216)8576279
MACKINAC COUNTY EMERGENCY MGMT (COMMAND CENTER)
17-JUL-15 16:11 (906)4301466
MICHIGAN DEPT OF COMMUNITY HEALTH (HSEES)
17-JUL-15 16:11 (517)3358364
MI INTELLIGENCE OPERATIONS CENTER (FUSION CENTER)
17-JUL-15 16:11 (517)2418000
MI INTELLIGENCE OPERATIONS CENTER (CIP DESK)
17-JUL-15 16:11 (517)3350262
NTL ENVMTL EMERG CENTRE CANADA (MAIN OFFICE)
17-JUL-15 16:11 (819)9973742
NATIONAL INFRASTRUCTURE COORD CTR (MAIN OFFICE)
17-JUL-15 16:11 (202)2829201
NOAA RPTS FOR MI (MAIN OFFICE)
17-JUL-15 16:11 (206)5264911
NATIONAL RESPONSE CENTER HQ (AUTOMATIC REPORTS)
17-JUL-15 16:11 (202)2671136
REPORTING PARTY (RP SUBMITTER)
17-JUL-15 16:11
OFFICE OF ENV. POLICY & COMPLIANCE (MAIN OFFICE)
17-JUL-15 16:11 (215)5975012
MICHIGAN DEQ (MAIN OFFICE)
17-JUL-15 16:11 (800)2924706
MICHIGAN DEQ (MAIN OFFICE 2)
17-JUL-15 16:11 (517)9305784
USCG DISTRICT 9 (COMMAND CENTER)
17-JUL-15 16:11 (216)9026109

ADDITIONAL INFORMATION

*** END INCIDENT REPORT # 1123092 ***
Report any problems by calling 1-800-424-8802
PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 1 8 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Theodore Luciow
Plant Manager
Double Eagle Steel Coating Company
3000 Miller Road
Dearborn, Michigan 48120

Re: Request for Information Pursuant to Section 104(e) of CERCLA for the Double Eagle Steel Coating Company, Dearborn, Michigan

Dear Mr. Luciow:

The U.S. Environmental Protection Agency is currently investigating the source, extent, and nature of releases of hazardous substances, pollutants, or contaminants pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §§ 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499, including but not limited to the release of a Resource Conservation and Recovery Act (RCRA) hazardous waste, at the Double Eagle Steel Coating Company facility, in Dearborn, Michigan, on July 15, 2015.

Pursuant to the authority of Section 104(e) of the CERCLA, 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request enclosed. Compliance with the enclosed Information Request is mandatory. Failure to respond fully and truthfully to each and every request within 20 days of receipt of this letter, or to adequately justify such failure to respond, can result in enforcement action by EPA and the imposition of penalties of up to $37,500[1] for each day of noncompliance. Noncompliance is considered by EPA to be not only failure to respond to the Information Request but also failure to respond completely and truthfully to each request. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal fines or up to five years of imprisonment or both under 18 U.S.C. § 1001.

[1] While the provisions of Section 104(e)(5) of CERCLA provide for a penalty per violation of up to $25,000 per day, the Civil Monetary Penalty Adjustment Rule, published at 40 C.F.R. Part 19, increased the maximum penalty to $27,500 per day for each violation occurring on or after January 31, 1997, to $32,500 per day for each violation occurring after March 15, 2004, and to $37,500 per day for each violation after January 12, 2009.

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EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501, et seq.

Your response to this Information Request should be mailed to:

James Entzminger
Chemical Emergency Preparedness
and Prevention Section (SC-5J)
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above.

Please direct any questions you may have regarding this Information Request to James Entzminger, at (312) 886-4062 or Entzminger.james@epa.gov.

Thank you for your cooperation in this matter.

Sincerely,

M. Cecilia Moore

M. Cecilia Moore, Chief
Enforcement and Compliance Assurance Branch

Enclosures (3) Information Request Definitions
Information Request Instructions
Information Request

DEFINITIONS

For the purpose of the Instructions and the Information Request set forth herein, the following definitions shall apply:

1. The terms "you" or "Respondent" shall mean the organization or entity identified in the cover letter, and its officers, managers, employees, contractors, trustees and agents.

2. The term "person" as used herein, in the plural as well as the singular, shall mean any natural person, firm, contractor, corporation, partnership, trust or governmental entity, unless the context indicates otherwise.

3. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including mixtures of hazardous substances.

4. The terms "furnish," "describe," or "indicate" shall mean turning over to EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to a request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control, then indicate where such information or documents may be obtained.

5. "Release" means any spilling, leaking, pumping, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing of any hazardous substance.

6. "And" as well as "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

7. The terms "transport" or "transportation" mean the movement of a hazardous substance by any mode, including pipeline, and in the case of a hazardous substance which has been accepted for transportation by a common or contract carrier, the terms "transport" or "transportation" shall include any stoppage in transit which is temporary, incidental to the transportation movement, and at the ordinary operating convenience of a common or contract carrier, and any such stoppage shall be considered as a continuity of movement and not as the storage of a hazardous substance.

8. The terms "pollutant" or "contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances.

9. The term "Facility" means (1) any building structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit,

pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (2) any site or area where a hazardous substance has been disposed of, or placed, or otherwise come to be located; but does not include any consumer products in consumer use or vessel.

10. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq., as amended, 40 C.F.R. Part 300 or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

INSTRUCTIONS

1. A separate response must be made to each of the questions set forth in this Information Request.

2. Precede each answer with the number in the Information Request to which it corresponds.

3. In answering each request, identify all contributing sources of information.

4. If information not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to EPA. Moreover, should the Respondent find, at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, Respondent must notify EPA as soon as possible.

5. Your response must be accompanied by a notarized affidavit from a responsible company official or representative stating that the information provided in this response is true and accurate to the best of the Facility's knowledge. To the extent that any information you provided relating to these requests is based on your personal knowledge, or personal knowledge of your employees, agents, or their representatives, this information shall be in the form of a notarized affidavit.

6. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read carefully the above-cited regulations before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

INFORMATION REQUEST

1. Identify all persons consulted in the preparation of the answers to this request.

2. Identify all documentation consulted, examined, or referred to in the preparation of the answers to this request and provide copies of all such documents.

3. What is Double Eagle Steel Coating Company's Standard Industrial Classification Code?

4. What is Double Eagle Steel Coating Company's Dun & Bradstreet number?

5. What are Double Eagle Steel Coating Company's annual sales for the most recently completed fiscal year?

6. How many employees are employed at Double Eagle Steel Coating Company, Dearborn, Michigan?

7. How many employees are employed at Double Eagle Steel Coating Company corporate wide?

8. Is Double Eagle Steel Coating Company, Dearborn, Michigan a RCRA facility? If so, provide the EPA Identification Number.

9. Provide a copy of your emergency plan which outlines the procedures for notification of accidental releases at your facility.

10. Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at your facility.

11. Provide the name and current address of the owner(s) of the property located at 3000 Miller Road, Dearborn, Michigan, during the time period of January 1, 2015 to the present.

12. Provide the name and current address of the operator(s) of the facility located at 3000 Miller Road, Dearborn, Michigan, during the time period of January 1, 2015 to the present.

13. If Double Eagle Steel Coating Company was a corporation during the time period of January 1, 2015 to the present, provide a copy of the Articles of Incorporation.

14. If Double Eagle Steel Coating Company was a subsidiary of a corporation during the time period of January 1, 2015 to the present, identify the parent corporation and provide copies of pertinent documents supporting the subsidiary relationship.

15. If Double Eagle Steel Coating Company was a division of a corporation during the time period of January 1, 2015 to the present, identify the corporation and provide copies of pertinent documents supporting the claim that this company is a corporate division.

16. If Double Eagle Steel Coating Company was a partnership during the time period of January 1, 2015 to the present, provide a copy of the partnership agreement.

17. If Double Eagle Steel Coating Company was a trust during the time period of January 1, 2015 to the present, provide all relevant agreements and documents to support this claim.

18. Describe in detail the process that produced the release of a hazardous substance which occurred on July 15, 2015.

19. Describe in detail the chain of events that produced the release of a hazardous substance which occurred on July 15, 2015.

20. Identify each hazardous substance released and its Chemical Abstract Service number.

21. How much of each hazardous substance was released? Describe your method or source of information in calculating the quantity released and provide the calculations.

22. Describe the surfaces on or to which each hazardous substance was released and how much was released to each surface. Describe your method or source of information in calculating the quantity and provide the calculations.

23. How much of each hazardous substance was released or migrated onto and/or into the soil and/or the subsurface strata? Describe your method or source of information in calculating the quantity and provide the calculations.

24. How much of each hazardous substance volatilized? Describe your method or source of information in calculating the quantity and provide the calculations.

25. How much of each hazardous substance was discharged into the sanitary sewer system? If any, describe the pre-treatment conducted by your facility. Describe your method or source of information in calculating the quantity and provide the calculations.

26. How much of each hazardous substance was discharged into the storm sewer system? Describe your method or source of information in calculating the quantity and provide the calculations.

27. Did the hazardous substance(s) react with any substance to cause a by-product? If so, explain and provide the calculations to show the reaction and quantity of each by-product released.

28. What was the concentration of each hazardous substance? Describe your method or source of information in determining the concentration.

29. Provide copies of any and all relevant descriptions of each hazardous substance(s) released, i.e., Material Safety Data Sheet (MSDS), Manifest, Analytical Data, etc.

30. Provide the RCRA hazardous waste identification number for each hazardous substance released, if one exists.

31. Provide the results of any and all analyses, including but not limited to results of any sampling that was conducted regarding this release.

32. Describe in detail the actions taken by your employees and/or anyone else regarding the emergency response to this release, including any and all chemicals used, the handling or clean-up of the substance, including transportation and destination.

33. Was the release contained solely within a building or structure? If so, explain.

34. Did any of the substance(s) released migrate beyond your facility's boundaries? If so, explain.

35. Provide copies of any permits that cover this release, and provide an explanation of why you believe this release is covered by this permit.

36. If the release was to a containment area, please respond to the following information requests:

    (a) What are the materials of construction for the containment area?
    (b) What are the dimensions of the containment area?
    (c) Did the containment area contain a neutralization agent? If so, what and how much of the neutralization agent was present?

37. Provide a diagram of your facility in relation to each of the facility's boundaries, north, east, south, west, and identify the distance between the point of the release and each facility boundary.

38. Provide a description of the area including residential, commercial, and industrial nature of the area surrounding your facility including the approximate distance of your closest neighbor in each direction.

39. If the release was from a storage area, i.e., tanker, storage tank, etc., provide the following information:

(a) Location of the tank or storage area, inside or outside of a building, ground level, one story up, etc.
(b) Location of the leak in relation to the tank or storage area, i.e., top left side, center top, center side, etc.
(c) Size of the hole from which the leak occurred.
(d) Length of tank or storage area.
(e) Diameter of tank or storage area.

40. To the best of your knowledge what was the duration of the release from onset to mitigation? Explain how you determined the onset and mitigation of the release and what documents or information you relied on to make your determination.

41. Provide the weather conditions at the time of the release including the temperature, humidity, wind speed and direction, precipitation, sunny/cloudy, and barometric conditions.

42. Was the release from a pressurized system? If so, explain and provide the amount of pressure in pounds per square inch.

43. If all the hazardous substance in the system was not released on July 15, 2015, how much hazardous substance was in the system at the time of the release, and how much hazardous substance was left in the system after mitigation of the release?

44. Was the release from a process pipe, a pipe connected to a tank, or a tank? If none of these apply, explain exactly where the release occurred.

45. If the release was from a process pipe or a pipe connected to a tank, provide the dimensions of the piping.

46. Were there any evacuations, persons medically treated, hospitalizations, and/or deaths associated with this release? If so, describe in detail.

47. Was there any known environmental damage, i.e., fish kills, vegetation damage? If so, describe in detail.

48. Provide both the date and time when you first realized that a hazardous substance was released from the facility on July 15. 2015.

49. Provide both the date and time when you had knowledge that a reportable quantity (RQ) of a hazardous substance(s) was released from the facility on July 15. 2015.

50. If the time of knowledge of the release and time of knowledge of an RQ released is not the same, explain what actions your employees took in determining that an RQ was released.

51. Did Double Eagle Steel Coating Company notify the National Response Center regarding the July 15, 2015 release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

52. Did Double Eagle Steel Coating Company notify the Michigan State Emergency Response Commission regarding the July 15, 2015 release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

53. Did Double Eagle Steel Coating Company notify the Wayne County Local Emergency Planning Committee regarding the July 15, 2015 release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

54. Did Double Eagle Steel Coating Company provide a written follow-up emergency notice to the Michigan State Emergency Response Commission? If so, provide documentation to support your claim.

55. Did Double Eagle Steel Coating Company provide a written follow-up emergency notice to the Wayne County Local Emergency Planning Committee? If so, provide documentation to support your claim.

October 1, 2015

Mr. James Entzminger
Chemical Emergency Preparedness
And Prevention Section (SC-5J)
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

SUBJECT: U. S. Steel Great Lakes Works Response to Request for Information Pursuant to Section 104(e) of CERCLA for Double Eagle Steel Coating Company, Dearborn, Michigan

Mr. Entzminger,

Please see the attached response to the questions submitted regarding Double Eagle Steel Coating Company on July 15, 2015. U. S. Steel appreciates the opportunity to respond to this request. Please let me know if you require any additional information or have any questions. I can be contacted at (313) 749-3856 or mlprzybylinski@uss.com.

Sincerely,

Maryellen Przybylinski

Maryellen Przybylinski

October 1, 2015

Mr. James Entzminger
Chemical Emergency Preparedness
And Prevention Section (SC-5J)
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

SUBJECT: U. S. Steel Great Lakes Works Response to Request for Information Pursuant to Section 104(e) of CERCLA for Double Eagle Steel Coating Company, Dearborn, Michigan

I certify that based off information and belief formed after reasonable inquiry, the information provided in this response is true and correct to the best of my knowledge and information.

1 Oct 15

Alexis Piscitelli
Manager – Environmental Department
Great Lakes Wroks
United States Steel Corporation

Date

1 Oct 15

James R. Gray
General Manager
Great Lakes Works
United States Steel Corporation

Date

1. Identify all persons consulted in the preparation of the answers to this request.

Maryellen Przybylinski – Environmental Engineer – U. S. Steel Great Lakes Works
Steven Ford – Administration Manager – First Responder – Double Eagle Steel Coating
Alexis Piscitelli – Director Environmental – U. S. Steel Great Lakes Works
Joseph Groat- Controller- U. S. Steel Great Lake Works
Robert Casselberry- Legal/Law Senior Counsel- U. S. Steel
Parker Adams- Environmental Control Manager- U. S. Steel

2. Identify all documentation consulted, examined, or referred to in the preparation of the answers to this request and provide copies of all such documents.

Please see attached detail in the Appendix.

3. What is Double Eagle Steel Coating Company's Standard Industrial Classification Code?

SIC Code 3479

4. What is Double Eagle Steel Coating Company's Dun & Bradstreet number?

131430183

5. What are Double Eagle Steel Coating Company's annual sales for the most recently completed fiscal year?

Double Eagle Steel Coating Company had $6,309,644.79 in sales for 2014. This is all related to the sale of scrap steel, leader strip steel, and other recyclable materials. Double Eagle processes steel for parent organizations and does not have sale of product.

6. How many employees are employed at Double Eagle Steel Coating Company, Dearborn Michigan?

Double Eagle Steel Coating Company was operated as a joint venture between United States Steel Corporation and AK Steel Corporation between January 1, 2015 and May 28, 2015, with the respective interests being 50%.

On May 29, 2015, United States Steel Corporation purchased the AK Steel interest of the property and is now the sole owner and operator of the facility.

At normal operations, Double Eagle Steel Coating Company employs approximately 120 people.

7. How many employees are employed at Double Eagle Steel Coating Company corporate wide.

United States Steel Corporation, the owner and operator of the Double Eagle Steel Coating Company employs approximately 23,000 people in North America and 12,500 people in Europe.

8. Is Double Eagle Steel Coating Company, Dearborn, Michigan a RCRA facility? If so, provide the EPA Identification Number.

MID981092190

9. Provide a copy of your emergency plan which outlines the procedures for notification of accidental releases at your facility.

Double Eagle Steel Coating Company's RCRA Plan is attached as Exhibit A of the Appendix.

10. Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at your facility.

Training records can be found in Exhibit B of the Appendix.

11. Provide the name and current address of the owner(s) of the property located at 3000 Miller Road, Dearborn, Michigan, during the time period of January 1, 2015 to the present.

The property at 3000 Miller Road Dearborn, Michigan was operated as a joint venture between United States Steel Corporation and AK Steel Corporation between January 1, 2015 and May 28, 2015, with the respective interests being 50%.

United States Steel Corporation
600 Grant Street
Pittsburgh, PA 15219

AK Steel Corporation
9227 Center Point Drive
West Chester, OH 45069

On May 29, 2015, United States Steel Corporation purchased the AK Steel interest in the property and is now the sole owner and operator of the facility.

12. Provide the name and current address of the operator(s) of the facility located at 3000 Miller Road, Dearborn, Michigan, during the time period of January 1, 2015 to the present.

See answer 11

13. If Double Eagle Steel Coating Company was a corporation during the time period of January 1, 2015 to the present; provide a copy of the Articles of Incorporation.

The articles of incorporation for United States Steel are attached in the Appendix as Exhibit C.

14. If Double Eagle Steel Coating Company was a subsidiary of a corporation during the time period of January 1, 2015 to the present, identify the parent corporation and provide copies of pertinent documentation supporting the subsidiary relationship.

See answer 11

15. If Double Eagle Steel Coating Company was a division of a corporation during the time period of January 1, 2015 to the present; identify the corporation and provide copies of pertinent documents supporting the claim that this company is a corporate division.

See answer 11

16. If Double Eagle Steel Coating Company was a partnership during the time period of January 1, 2015 to the present; provide a copy of the partnership agreement.

See answer 11

17. If Double Eagle Steel Coating Company was a trust during the time period of January 1, 2015 to present, provide all relevant agreements and documentation to support this claim

See answer 11

18. Describe in detail the process that produced the release of a hazardous substance which occurred on July 15, 2015.

Double Eagle electro galvanizes steel coil by running a steel strip through plating solution. As part of this process, Double Eagle utilizes a 3% acid solution to rinse residual plating solution from the strip. This process waste water is pumped over to the equalization tank at the waste water treatment plant via a sandpiper pumping system. The waste water runs up a pipe outside the equalization tank and cascades into the top of the tank. During operation, the transfer pipe along the outside of the equalization tank developed a pin-hole leak.

19. Describe in detail the chain of events that produced the release of a hazardous substance which occurred on July 15, 2015.

Environmental Liaison Manager, Steve Ford, was notified via phone by, Waste Water Treatment Operator, Ron Stokosa at 3:45 pm stating he had discovered liquid on the ground from what appeared to be a leak in the equalization line. Steve Ford met Ron Stokosa at the site by 3:50 pm. Upon arrival, Steve Ford confirmed that no material had or was migrating toward the storm sewer. He then contacted an on-site cleaning crew to begin cleanup activities.

Within the first few minutes, the Safety Liaison Manager, Maintenance Planner, Plant Manager, Piping Support, and Industrial Cleaning Service were called and present a few minutes later.

The decision was made to shut off the pumps that transfer the waste water over to the equalization line, and a safe, organized shutdown of the plant was initiated.

Piping support personnel stripped the insulation off the piping to reveal a pin-hole leak in the fiberglass line. The material was running down the pipe to ground. Double Eagle personnel were vacuuming up the liquid with a walk-behind suction cart. Once the flow stopped, additional areas of the piping run were stripped of their insulation to inspect the piping as well as stage an inline repair zone for the pipe.

There was residual wet earth where the leak had occurred. An industrial cleaner, U.S. Ecology, was on site and removed a section of ground approximately 2 inches deep by roughly an 8' x 8' square removing any residual material that may have penetrated the soil.

After removal actions were completed, there was approximately 20 gallons of liquid as well as approximately ½ of a 55-gallon drummed of soil collected.

20. Identify each hazardous substance released and its Chemical Abstract Service Number.

The material released was waste water from the operating side of the plant. It does not have a specific CAS number, but triggered a D002 characteristic at the time of release because the pH periodically fluctuates below 2.0-2.4.

21. How much of each hazardous substance was released? Describe your method or source of information in calculating the quantity released and provide the calculations.

The total volume of waste water released from the pipe was well below 100 gallons. This determination was conservatively made based on the amount of water that was in the hopper of the suction cart as well as the amount of remediated soil.

22. Describe the surfaces on or to which each hazardous substance was released and how much was released to each surface. Describe your method or source of information in calculating the quantity and provide the calculations.

The vast majority of the material (less than 100 gallons) was released to open ground (soil) directly below the vertical pipe. This was estimated based on the amount of waste water collected in the suction cart and volume of soil that was remediated. A very small volume (less than 2 gallons) of water migrated to asphalt that was adjacent to the soil.

23. How much of each hazardous substance was released or migrated onto and/or into the soil and/or the subsurface strata? Describe your method or source of information in calculating the quantity and provide the calculations.

Please review answers to questions No. 20, 21, and 22 above. The source of information was an estimation of visual observation of the liquid in the suction hopper, the soil collected in to the drum and the minimal section of asphalt containing moisture from the leak.

24. How much of each hazardous substance volatilized? Describe your method or source of information in calculating the quantity and provide the calculations.

None

25. How much of each hazardous substance was discharged in the sanitary sewer system? If any, describe the pre-treatment conducted by your facility. Describe your method or source of information in calculating the quantity and provide the calculations.

None. There was no release into the sanitary sewer system.

26. How much of each hazardous substance was discharged into the storm sewer system? Describe your method or source of information in calculating the quantity and provide the calculations.

None. There was no release to the storm sewer system.

27. Did the hazardous substance(s) react with any substance to cause a by-product? If so, explain and provide the calculations to show the reaction and quantity of each by-product released.

No. There was no reaction with any other substance causing a by-product

28. What was the concentration of each hazardous substance? Describe your method or source of information in determining the concentration.

The pH measurements of the released waste water ranged from 1.8 to 2.4. These results were obtained in-house at the Waste Water Treatment Plant.

29. Provide copies of any and all relevant description of each hazardous substances(s) released, ie., Material Safety Data Sheet (MSDS), Manifest, Analytical Data, etc.

The waste water sent to the waste treatment facility does not have an SDS. It is not a product, so no SDS is available.

30. Provide the RCRA hazardous waste identification number for each hazardous substance released, if one exists.

D002

31. Provide the results of any and all analyses, including but not limited to results of any sampling that was conducted regarding this release.

Double Eagle in-house lab analyzed samples of the material with results ranging from pH of 1.8 to 2.4.

32. Describe in detail the action taken by your employees and/or anyone else regarding the emergency response to this release, including any and all chemical used, the handling or clean-up of the substance, including transportation and destination.

Pump(s) were shut down as soon as the leak was confirmed. Collection of waste water on the soil was started within 15 minutes of discovery. Remediation of impacted soil was completed within an hour of discovery. Approximately 20 gallons of water was placed in the on-site RCRA collection area for disposal, and the partially full 55-gallon drum of wet soil was placed in the RCRA storage area as well.

33. Was the release contained solely within a building or structure? If so, explain.

No

34. Did any of the substance(s) released migrate beyond your facility's boundaries? If so, explain.

No. No substance released migrated beyond the facility boundaries.

35. Provide copies of any permits that cover this release, and provide an explanation of why you believe this release I covered by this permit.

There are no permits covering this release.

36. If the release was to a containment area, please respond to the following information request.

This release was not to a containment area so (a), (b) and (c) do not apply

a. What are the materials of construction for the containment area?
b. What are the dimensions of the containment area?
c. Did the containment area contain a neutralization agent? If so, what and how much of the neutralization agent was present?

37. Provide a diagram of your facility in relation to each of the facility's boundaries, north, east, south, west, and identify the distance between the point of the release and each facility boundary.

An aerial picture of where the release occurred can be found in Exhibit D of the Appendix.
Approximate Distance:
North: Ford F-150 lot ~ ¼ mile
South: Eagle Pass ~ 70 feet
East: Ferrous after RR Switching ~ ½ mile
West: Ford Rouge Complex ~ 300 yards

38. Provide a description of the area including residential, commercial, and industrial nature of the area surrounding your facility including the approximate distance of your closes t neighbor in each direction.

Double Eagle Steel Coating Company is in an industrial setting surrounded by other industrial complexes, local roads, and local railroad tracks. North of Double Eagle is Ford Motor Company F-150 vehicle transfer lot. South of Double Eagle's property line is Eagle Pass which is a public roadway. East of Double Eagle property is a railroad yard followed by Ferrous Metal Processing. West of Double Eagle property is Dearborn Roadway Miller Road and Ford Motor Company Rouge Complex across from Miller. Property lines butt up against the other Industrial facilities on the North and East. Physical structures of the closest neighbors would be approximately 500 yards plus a roadway to Ford Rouge Complex and a minimum ½ mile from Ferrous. There is no actual structure other than a gated Guard Shack at the Ford F-150 transfer lot.

39. If the release was from a storage area, ie., tanker, storage tank, etc., provide the following information

This release was not from a storage area so (a) – (e) do not apply.

a. Location of the tank or storage area, inside or outside of a building, ground level, one story up, etc.
b. Location of the leak in relation to the tank or storage area, i.e, top left side, center top, center side, etc.
c. Size of the hole from which the leak occurred.
d. Length of tank or storage area
e. Diameter of tank or storage area

40. To the best of your knowledge what was the duration of the release from onset to mitigation? Explain how you determined the onset and mitigation of the release and what documents or information you relied on to make your determination.

It is estimated that waste water trickled from the pipe for one to two hours. This was a very small pinhole and it would have taken some time for the water to soak up in the insulation and work its way to ground.

The Waste Water treatment Operator had been in the immediate area multiple times that day and had not seen any evidence of a leak prior to that time. His last recollection of being in the area was somewhere around noon.

41. Provide the weather conditions at the time of the release including the temperature, humidity, wind speed and direction, precipitations, sunny/cloudy, and barometric conditions.

July 15th, 2015 was a clear sunny day. The mean temperature was 62.6 °F. Average humidity was 63%. Wind speed and direction was from the north at 10mph. The barometric pressure was 29.80 in.

42. Was the release from a pressurized system? If so, explain and provide the amount of pressure in pounds per square inch.

Yes. The sandpiper system sending the waste water to the equalization tank would provide a maximum of 30 PSI. The system is not monitored for pressure so a specific PSI is not available.

43. If all the hazardous substances in the system were not released on July 15, 2015, how much hazardous substance was in the system at the time of release, and how much hazardous substance was left in the system after mitigation of the release?

At the time of release, there was approximately 1044 gallons of waste water in the system. This was determined by knowing that the 8" line at 2.61 gallons per foot was approximately 400 feet long. With the previous conservative estimate of less than100 gallons being released, more than 944 gallons were left in the system.

44. Was the release from a process pipe, a pipe connected to a tank, or a tank? If none of these apply, explain exactly where the release occurred.

The release was from a process waste water pipe connected to the equalization tank at the waste water treatment plant. This line is the vertical cascade that allows waste water to enter the equalization tank to begin treatment.

45. If the release was from a process pipe or a pipe connected to a tank, provide the dimensions of the piping.

The dimensions of the process waste water line are 8" x 400'.

46. Were there any evacuations, persons medically treated, hospitalizations, and/or deaths associated with this release? If so, describe in detail

There were no evacuations, medical treatments, hospitalization or deaths

47. Was there any known environmental damage, ie. Fish kills, vegetation damage? If so, describe in detail.

There was no known environmental damage.

48. Provide both the date and time when you first realized that a hazardous substance was released from the facility on July 15, 2015.

July 15 at approximately 4:30 pm after the pH was tested.

49. Provide both the date and time when you had knowledge that a reportable quantity (RQ) of a hazardous substance(s) was released from the facility on July 15, 2015.

Employee Steve Ford realized that a reportable quantity ("RQ") release had occurred within one hour of the release and contacted the Michigan Pollution Emergency Alert System ("PEAS") hotline at approximately 5:30 PM on July 15th. The National Response Center ("NRC") was not notified until 4:03 PM on July 17th, when an internal review of the event revealed that, due to misunderstanding the reporting procedures, full RQ notification had not been made. The understanding at the time was that notification to PEAS was sufficient. The delay in notifying the NRC did not impede the on-site response and cleanup activities.

50. If the time of knowledge of the release and time of knowledge of an RQ released is not the same, explain what action your employees took in determining that an RQ was released.

See Comment Above

51. Did Double Eagle Steel Coating Company notify the National Response Center regarding the July 15, 2015 release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

Yes, please see answer 49 above. NRC report number is 1123092 and attached as Exhibit E.

52. Did Double Eagle Steel Coating Company notify the Michigan State Emergency Response Commission regarding the July 15, 2015 release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

Yes. Steve Ford contacted the PEAS hotline. This call was made at approximately 5:30 pm on July 15th.

53. Did Double Eagle Steel Coating Company notify the Wayne County Local Emergency Planning Committee regarding the July 15, 2015 release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

No

54. Did Double Eagle Steel Coating Company provide a written follow-up emergency notice to the Michigan State Emergency Response Commission? If so, provide documentation to support your claim.

Yes, a letter was written to Jennifer Hazleton as directed by the PEAS operator. Exhibit F.

55. Did Double Eagle Steel Coating Company provide a written follow-up emergency notice to the Wayne County Local Emergency Planning Committee? If so, provide documentation to support your claim.

Yes. See Attached. Exhibit G.

Appendix

Exhibit A.....RCRA Plan

Exhibit B.....Training Records

Exhibit C.....Articles of Incorporation

Exhibit D.....Boundary Diagram

Exhibit E.....NRC Report

Exhibit F.....PEAS 10 Day Letter

Exhibit G.....Wayne County LEPC 10 Day Letter

DOUBLE EAGLE
STEEL COATING COMPANY

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN

CONTINUOUS IMPROVEMENT TO ENVIRONMENT
CITE
Double Eagle Steel

DOUBLE EAGLE STEEL COATING COMPANY
3000 MILLER ROAD
DEARBORN, MICHIGAN

Prepared by Civil & Environmental Consultants, Inc. (CEC)
Pittsburgh, Pennsylvania

July 2012

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Figure 2 – DESCC Site Map
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Table 1 – Chemical Storage Tank and Material Inventory
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Appendix A – Storage Tank, Process Tank, and Hazardous Material Locations
Appendix B – Layout of Storm Sewers
Appendix C – Evacuation Information
Appendix D – Fire Loop and OS&Y Valve Locations
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1.0 INTRODUCTION

This Resource Conservation and Recovery Act (RCRA) Contingency Plan (Contingency Plan) has been prepared for the double eagle steel coating company (DESCC) facility located at 3000 Miller Road in Dearborn, Michigan. The DESCC facility is the largest producer of electro-galvanized steel in the world. The company is a joint venture of U.S. Steel and Severstal North America. DESCC's rolled steel products are predominantly used by automobile manufacturers and suppliers for parts such as doors and body panels, as well as other industries where high quality, rust resistant sheet steel is required. DESCC has been ISO 9001 Registered since May 2, 1996. This document was prepared based on information provided by DESCC representatives and observations during site visits.

The information contained in this Contingency Plan has been prepared in accordance with Michigan Department of Environmental Quality (DEQ) regulations and federal Resource Conservation and Recovery Act regulations described in 40 CFR, Part 265.

1.1 DESCRIPTION OF THE INDUSTRIAL OR COMMERCIAL ACTIVITY

The DESCC facility is located in the Dearborn, Michigan, which is in Wayne County (see Figure 1). The facility is located at 3000 Miller Road off I-94, approximately 10 miles west of downtown Detroit in Dearborn, Michigan.

DESCC is the largest producer of electro-galvanized steel in the world. The company is a co-owned venture of U.S. Steel (USS) and Severstal North America (Severstal NA). DESCC's rolled steel products are predominantly used by automobile manufacturers and suppliers for parts such as doors and body panels, as well as other industries where high quality, rust resistant sheet steel is required. DESCC has been ISO 9001 Registered since May 2, 1996. The facility is also certified under the ISO 14001 EMS standard.

The plant was constructed on an approximately 17-acre site acquired from the Ford Motor Company. This site's former use was generally for the parking of Ford employees' automobiles.

Construction of the facility began in August 1984 and was completed in January 1986. The facility plates coiled sheet steel supplied by USS and Severstal NA with either zinc or zinc/iron alloy on either one side or both sides. The plating plant, which began operations in February 1986, employs an electroplating process known as Consumable Anode Radial One Side Electroplating Line, or "CAROSEL." The coiled steel is pulled around a rotary cathode through a series of zinc/acid baths called plating cells where the zinc or zinc-iron is electrolytically applied to the coiled steel. Zinc or iron anodes are employed in this process and are partially consumed during the plating process. There are 42 plating cells in the "CAROSEL" system, of which some or all are used in the process, depending upon the product being produced.

Of the approximate total 17 acres of property, about eight acres are occupied by buildings (Main Processing Building, Office Building, Maintenance Building, Cooling Tower Building, and Wastewater Treatment Plant). The Main Processing Building is about 7.5 acres; plating operations are conducted in this building. Figure 2 shows an overview of the DESCC facility.

A variety of chemicals are used in the "CAROSEL" process, including citric acid, ferric chloride, hydrochloric acid, potassium chloride, zinc chloride, and proprietary USS chemical products. These chemicals are consumed in the process, discharged through the Wastewater Treatment Plant, or shipped out of the plant for treatment and/or disposal. Table 1 provides a listing of the chemical tanks and process tanks onsite, and Appendix A shows the tank locations.

The facility has a RCRA generator permit for process filter sludge, wastewater filter sludge, and liquid wastes. These can be accumulated onsite for less than 90 days. There are no known sources of PCB or asbestos at DESCC.

In addition to the manufacturing operations listed above, DESCC operates a wastewater treatment plant which discharges to the Rouge River under the terms of an NPDES permit. Process wastewater, non-contact cooling water, and storm water runoff from the facility and surrounding areas are treated at the wastewater plants. There are two distinct outfall areas within the facility, noted in Appendix B, which include:

- Outfall 100 – treated process wastewater, non-contact cooling water, and treated storm water from secondary containment areas; and
- Outfall 200 – storm-water discharges and non-contact cooling water.

A variety of oils and petroleum products are used throughout the facility. Oil and petroleum products are stored in tanks and drums. There are no automatic containment drains installed in the facility. Much of DESCC's oil storage is located indoors. Outdoor containment areas that collect precipitation are monitored daily. In the event impacted storm waste is observed in the secondary containment structures, the water will not be released from the containment area and will be appropriately treated on-site or transferred to a licensed disposal facility.

1.2 DESCRIPTION OF EXISTING EMERGENCY RESPONSE PLANS

DESCC previously prepared an Integrated Contingency Plan (ICP) to address emergency response actions at the Dearborn facility. This RCRA Contingency Plan supersedes the previous ICP for the facility.

1.3 MATERIAL AND WASTE INVENTORY

Information in this section is used to evaluate the prevention, containment, mitigation, cleanup, and disposal measures which would be used in the event of a spill, discharge, explosion, or fire. As new materials are added to the list, their pollution potential will also be evaluated. More detailed descriptions are provided for materials that have a high potential for spills, discharges, explosions, or fires (such as those stored in bulk storage). Materials that have a low potential for spills discharges, explosions, or fires are only minimally discussed.

A list of the materials used at DESCC, which have the potential for exhibiting adverse environmental or health-related effects if accidentally released, are presented in Table 1. Note that the quantities of materials stored at the facility identified in the table might vary slightly during the year. Material Safety Data Sheets (MSDS) are maintained onsite for chemicals and compounds used at the facility in accordance with the Occupational Safety and Health

Administration worker right-to-know requirements. Copies of the MSDSs for selected materials stored at the facility are maintained in Qualtrax.

Indoor chemical storage areas at the facility consist of the wastewater treatment facility, chemical building, coil storage building, terminal building, process building, and anode room. Outdoor chemical storage areas consist of the AST farm located along the west side of the chemical building, diesel fuel AST located at the southeast corner of the anode room, and waste liquid AST farm north of the north motor room. Regulated outdoor AST are situated within secondary containment. Maps showing locations of the storage tanks at DESCC are provided in Appendix A. Further details regarding the storage tanks are provided on Table 1.

Materials that are involved in the DESCC process and stored onsite are hydrochloric acid, sulfuric acid, caustic soda, lime, sodium hydroxide, zinc chloride, ferrous chloride, USSP-X, and plating solution (which consists of citric acid, ferrous chloride, hydrochloric acid, potassium chloride, USSP, and zinc chloride).

1.4 POLLUTION INCIDENT HISTORY

Previous spills are summarized in the following items:

- On May 6, 2006 Tank 12 level sensors did not indicate a high level resulting in an overflow of the tank into secondary containment. All of the spilled liquid was contained. It was determined that the tank sensors were not correctly calibrated. These sensors were repaired and recalibrated.
- On September 25, 2006 the DESCC sanitary sewer overflowed from manhole S-4 into the stormwater system at catch basin CB-25. The cover to the catch basin had been removed recently due to heavy rain and was left off allowing the sewage water to flow into the stormwater system. The high level alarm for the west side of Miller Road was annunciated in the Upper South Motor Room on the pump control panel. When the overflow was discovered, absorbent matting was placed on the catch basin to minimize the additional amount of sewage water that entered the stormwater system. Once the

flow had ceased to overflow the manhole, the remaining water on the roadway was cleaned up with absorbent material.

- On October 3, 2006 a breach in an 8-inch Waste Water Treatment Sump transfer line from the Chemical Building was discovered. The pump feeding the damaged pipe was shut off to stop the flow. All discharged water was pumped into the wastewater treatment spillway and back to the equalization tank. No water left the property, either thorough runoff or storm sewers.
- On May 8, 2007 a leak of 32% HCL occurred during a maintenance operation. Tanks 8 and 9 were emptied the day before maintenance of a valve was to occur. Pipe Fitters entered the diked area around the tanks equipped with PPE attempting to remove the existing valve from Tank #9. HCL started leaking and the workers left the area immediately. Acid proceeded to leak for 90 minutes and Dan Whaley responded to the incident wearing a Full Faced Air Purifying Respirator to close the valve. Acid was kept in secondary containment before being pumped out for treatment. The repairs were completed and new meters were installed.
- On January 16, 2008 electronic monitoring devices showed a loss of plating solution entering the chemical building basement. Before any valves could be closed nearly the entire upper deck had drained in the basement. No one was injured; however, a substantial amount of equipment was lost and damaged. The pumps in the basement were destroyed by the spill, so the liquid was pumped using vac-trucks to aboveground tanks staged with secondary containment berms. All of the solution was treated in the WWTP over the next five days while the storage tanks were monitored around the clock to ensure none of the solution was lost to the environment.
- On June 16, 2008 an unknown quantity of sulfuric acid was released to the soil and gravel fill adjacent to the Equalization Tank, which was then flushed to the parking lot area by intense rain that night. Storm water was observed to have pooled adjacent to the WWTP sometime during the night. Immediately upon incident recognition, the safety Department mobilized to provide Spill Pigs to cover all drains and notified all plant personnel and the off-site environmental engineer to coordinate response. Area storm drains were covered and the WWTP Chemist monitored Outfall 200a which did not indicate the presence of any acidic water leaving the site.

- DESCC experienced an overflow from the auxiliary cooling tower and communicated the water overflow to MDEQ on August 19, 2009. The cooling tower water used is river water, identical to the noncontact cooling water that has been permitted for discharge through Outfall 100a, with the exception that small quantities of water treatment chemicals were added. MDEQ did not require a written report of the cooling water overflow, and email correspondence and phone calls with MDEQ personnel were satisfactory to resolve the matter.
- On Tuesday, November 16, 2010 an oil sheen was discovered at storm water Outfall 200. Immediate actions were taken to remove the oil and prevent oily water from leaving the site. An investigation into the source of the oil was also begun immediately following the discovery. Letters to MDEQ were submitted regarding the oily water on November 19, 2010 and on December 15, 2010 to describe the investigation and response items.

1.5 PURPOSE AND IMPLEMENTATION OF RCRA CONTINGENCY PLAN

DESCC has developed and will implement this RCRA Contingency Plan for effective action to minimize and abate hazards to human health and the environment from fire, explosion, emission or discharge of hazardous waste or hazardous waste constituents to air, soil, surface water or groundwater. The provisions of the Contingency Plan will be carried out immediately whenever there is a fire, explosion, emission or discharge of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

On May 19, 1980 the United States Environmental Protection Agency (USEPA) promulgated regulations which outline standards applicable to hazardous waste generators and hazardous waste treatment, storage, and disposal facilities. The Resource Conservation Recovery Act (RCRA) implemented in 40 CFR 265 Subparts C and D requires hazardous waste generators and hazardous waste treatment, storage, and disposal facilities to prepare and maintain a contingency plan.

The Contingency Plan describes arrangements agreed to by local police Departments, fire Departments, hospitals, contractors, and state, county, and local emergency response teams to

coordinate emergency services, under Subchapter C (relating to preparedness and prevention). The Contingency Plan lists names, addresses and phone numbers (office and home/cell) of persons qualified to assist the Emergency Coordinator – see Table 2. The DESCC employees identified on this list have the authority to call outside contractors and agencies for emergency support when needed. The Environmental Liaison is the Primary Emergency Coordinator and others are listed in the order in which they may assume responsibility as alternates. The Contingency Plan includes a list of emergency equipment at the facility. In addition, the plan includes the location and a physical description of items on the list, and a brief outline of its capabilities.

1.6 PLAN REVISIONS

This Contingency Plan will be reviewed and promptly amended, if necessary, whenever:

- the plan fails in an emergency;
- the list of Emergency Coordinators changes;
- the list of emergency equipment changes;
- the facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous substances or changes the response necessary in an emergency;
- there are substantial changes in the facility emergency organization;
- the applicable MDEQ regulations are revised;
- the removal or the addition of aboveground storage tank(s), the removal or addition of underground storage tank(s), or the addition of storage areas which may contain materials subject to exposure to storm water; or DEQ requests that the plan be revised.

2.0 IMPLEMENTATION OF RCRA CONTINGENCY PLAN

2.1 ORGANIZATIONAL STRUCTURE OF FACILITY FOR IMPLEMENTATION

At all times, there must be at least one employee at the facility, or on call, who is responsible for coordinating emergency measures and has the authority necessary to carry out the contingency plan. The Emergency Coordinator must be thoroughly familiar with the facility's contingency plan, operations and activities at the facility, the location and characteristics of waste handled, the location of records within the facility, and the facility layout.

The Environmental Liaison listed in Table 2 has been designated as the Primary Emergency Coordinator, and has the administrative responsibility for developing, updating, maintaining, and implementing this Contingency Plan. Specifically, these responsibilities include:

- Identification of materials and wastes handled during site operation (inventory);
- Identification of potential spill sources (risk assessment);
- Establishment of spill-reporting procedures;
- Coordination of the visual inspection program;
- Review of past incidents, spills, and countermeasures employed;
- Coordination and implementation of the Contingency Plan goals;
- Coordination of activities for spill cleanup;
- Notification of appropriate authorities;
- Tank and chemical storage area inspections;
- Training/educational programs and updates;
- Ensuring periodic review of the Contingency Plan for adequacy and appropriateness;
- Administration and institution of appropriate changes at regular intervals;
- Review of new construction and process changes relative to the Contingency Plan;
- Evaluation of Contingency Plan effectiveness prior to, during and subsequent to its implementation;
- Instituting improvements to the Contingency Plan.

Secondary Emergency Coordinators have also been designated. These Secondary Emergency Coordinators will report directly to the Primary Emergency Coordinator in matters regarding this plan, and can assist with implementing the above-listed items.

2.2 LIST OF EMERGENCY COORDINATORS

As mentioned previously, DESCC Emergency Coordinators are listed in Table 2. The Environmental Liaison identified in Table 2 will be the Primary Emergency Coordinator and others listed will be Secondary emergency Coordinators. There will be at least one employee, either on the facility premises or on call, with the responsibility for coordinating emergency response measures. The Primary and Secondary Emergency Coordinators will be thoroughly familiar with this Contingency Plan, site operations and activities, the location and characteristics of materials and wastes handled, the location of the facility's records, and the layout of the facility. The Emergency Coordinators have the authority to commit the resources necessary to carry out the Contingency Plan and for coordinating emergency response measures. In the event of a spill or release, one of the Emergency Coordinators will be immediately notified.

2.3 DUTIES AND RESPONSIBILITIES OF THE EMERGENCY COORDINATOR

As required by the contingency plan guidance documents, whenever there is an imminent or actual emergency situation, the Emergency Coordinator must immediately:

1. Activate internal facility alarms or communication systems where applicable, to notify all facility personnel.
2. Notify appropriate state or local agencies with designated response roles and contracted emergency response companies if additional assistance is required.
3. Identify the problem. Is it a physical emergency such as a fire, explosion, or spill? Is it a natural disaster such as a flood, tornado, or other severe weather? Is it a social emergency such as a bomb threat, riot, or vandalism?
4. Assess the health or environmental hazards and how this problem or condition will affect employees or its affect on the surrounding community.

5. Take reasonable measures to stabilize the situation. The Emergency Coordinator will take reasonable measures so that the fire, explosion, emission, or discharge will not reoccur or spread to other materials at the plant. These measures can include, when appropriate, stopping operations, collecting and containing released materials or wastes, and removing or isolating containers.

Whenever there is an emission, discharge, fire, or explosion, the Emergency Coordinator must immediately identify the character, exact source, amount, and areal extent of emitted or discharged materials. He may do this by observation, by review of facility records or manifests, and, if necessary, by instrumental and chemical analysis. Concurrently, the Emergency Coordinator must assess possible hazards to human health or the environment that may result from the emission, discharge, fire, or explosion. This assessment must consider both direct and indirect effects of the emission, discharge, fire, or explosion.

If the Emergency Coordinator determines that the facility has had an emission, discharge, fire, or explosion which would threaten human health or the environment (outside the facility) and if evacuation of local areas may be advisable, he must immediately notify the applicable local authorities (police, fire, etc.); he must also immediately notify the DEQ by telephone at (800) 292-4706 (24-hour number), DEQ Southeast Michigan District Office at (586) 753-3700 , the National Response Center at (800) 424-8802, Wayne County LEPC at (734) 942-5289, and the Michigan Emergency Management Agency at (269) 961-7749, and report the following information:

- Name of the person reporting the incident;
- Name and location of the facility;
- Telephone number where the person reporting the spill can be reached;
- Date, time, and location of the incident;
- A brief description of the incident, nature of the materials involved, extent of any injuries, and possible hazards to human health or the environment;
- The estimated quantity of the materials spilled;
- The extent of contamination of land, water, or air, if known.

If spills or discharges of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substance in greater than reportable quantities has occurred, the Emergency Coordinator must notify Michigan DEQ at (800) 292-4706 and the National Response Center at (800) 424-8802 and report the above information. For an off-site release (spill or discharge) of a reportable quantity of a CERCLA hazardous substance or a Superfund Amendments and Reauthorization Act extremely hazardous substance, the Emergency Coordinator must immediately notify the National Response Center at (800) 424-8802 and report the above information.

If a release occurs from a storage tank which enters a water supply or which threatens the water supply of downstream users, the Emergency Coordinator must immediately notify the Wayne County LEPC at (734) 942-5289 (answers from 8:00 AM – 5:00 PM, dial 911 after hours), and the Michigan Emergency Management Agency at (517) 336-6464 , and Michigan DEQ at (800) 292-4706. If appropriate, the Emergency Coordinator may assist the Emergency Management Agencies in notifying the downstream water users. The priorities for notification will be by closest proximity to the release site.

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fire, explosion, emission, or discharge do not occur, recur, or spread to other materials at the facility. These shall include, where applicable, stopping facility operations, collecting and containing released materials, and removing or isolating containers. If the facility stops operations in response to a fire, explosion, emission, or discharge, the Emergency Coordinator must ensure that adequate monitoring is conducted for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment whenever this is appropriate.

The Emergency Coordinator will oversee and direct facility personnel in the performance of their responsibilities for addressing the emergency situation. Immediately after an emergency, the Emergency Coordinator (with DEQ approval) must provide for treating, storing, or disposing residues, contaminated soil, etc., from an emission, discharge, fire, or explosion at the facility. The Emergency Coordinator must ensure that in the affected areas of the facility, no material incompatible with the emitted or discharged residues is processed, stored, treated, or disposed

until cleanup procedures are completed and that emergency equipment utilized in implementation of the Contingency Plan is cleaned and fit for its intended use before operations are resumed. DESCC will notify the Department and the appropriate State or local authorities that the facility is in compliance before operations are resumed in the affected areas of the facility. DESCC will note the time, date, and details of an incident that requires implementing the Contingency Plan.

2.3.1 Emergency Assistance from Outside Contractors

Outside Contractors are to respond to releases or potential releases for the purpose of stopping the release and cleaning the area. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch, or otherwise stop the release of a hazardous substance. Outside contractors will work under the direction of the Emergency Coordinator and will communicate all activities through the Emergency Coordinator.

2.3.2 Emergency Assistance from Dearborn Fire Department

Requests for assistance in handling an emergency situation at this facility shall come from the Emergency Coordinator or designee. In response, the Dearborn Fire Department will dispatch firefighters and equipment to the facility from the nearest available fire station. The highest ranking fire officer/fire fighter responding to the facility shall become the incident commander.

The incident commander shall immediately contact the Emergency Coordinator to determine the nature, possible hazards, and status of the emergency situation. The incident commander shall be responsible for determining if second or additional alarms should be issued to other fire stations within the area and shall be responsible for issuing the necessary additional alarms. The incident commander shall be responsible for directing all emergency response forces, the method of attack to control the hazardous substance spill/release or abate the emergency situation, and determine whether the evacuation of personnel outside the facility may be necessary. The incident commander shall be responsible for contacting the Emergency Coordinator upon arrival

at the scene. The Emergency Coordinator will assist the incident commander in the identification of the hazardous substance or material and recommend an appropriate response.

2.3.3 Emergency Assistance from Dearborn Police Department

Requests for assistance in handling an emergency situation at this facility shall come from the Emergency Coordinator or designee. In response, the police department will dispatch an officer and patrol car to the facilities main entrance (unless directed to an alternate entrance by the Emergency Coordinator). The dispatched officer will direct traffic at the facility entrance to allow emergency vehicles unobstructed access into the facility. The police department will also assist in the evacuation of personnel outside the facility whenever the conditions of a hazardous substance release, fire or explosion could threaten human health outside the facility.

2.3.4 Emergency Assistance from Oakwood Hospital

The hospital emergency Department administrator or designee shall be familiarized with the properties of hazardous substances used at the facility, the MSDS, and U.S. DOT Emergency Response Guidelines for the hazardous substance components, and the types of injuries or illnesses which could result from fires, explosions, or releases involving hazardous substances at this facility. The hospital shall be prepared to handle these types of injuries or designate which ones they cannot handle so that alternate services can be secured. When reporting an emergency where injuries resulting from hazardous substance exposures have occurred, the Emergency Coordinator will contact the Emergency Staff Physician on duty, identify the substance or material involved, and give a phone contact number that will be kept open. The Emergency Coordinator will serve as the focal point for the transfer of information.

2.3.5 Emergency Assistance from Contractors Emergency Response Team

Requests for assistance in handling an emergency situation at this facility shall come from the Emergency Coordinator or his designee. In response, the contractor shall ascertain through phone conversation with the Emergency Coordinator or designee the nature and extent of the

emergency situation. The contractor shall make the necessary arrangements to dispatch personnel and equipment to the facility to contain, recover, and remove any released materials; and to minimize any threats to human health or the environment.

2.4 REPORT REQUIREMENTS

Within 15 days after the incident, DESCC will submit a written report on the incident to DEQ and the U.S. Environmental Protection Agency regional administrator.

The report must be submitted to:

Director - Bureau of Water Quality Management
Michigan Department of Environmental Quality
2nd Floor, South Tower
525 West Allegan Street
P.O. Box 30473
Lansing, MI 48909-7973

Regional Administrator
U.S. Environmental Protection Agency
Region V
Superfund Division
77 West Jackson Boulevard
Mail Code S-6J
Chicago, IL 60604

Director - Southeast Michigan District Office
Michigan Department of Environmental Quality
27700 Donald Court
Warren, MI 48092

The report should include the following information:

- Name, address, and telephone number of the individual filing the report;
- Name, address, and telephone number of the installation;
- Date, time, type, and location of incident;
- A brief description of the circumstances causing the incident;

- Description and estimated quantity (by weight) of materials or wastes involved;
- The extent of injuries, if any;
- An assessment of actual or potential threat to human health or the environment and assessment of contamination of land, water, or air, where applicable;
- Estimated quantity and disposition of recovered materials or wastes that resulted from the incident;
- A description of what actions DESCC intends to take to prevent a similar occurrence in the future.

2.5 CHAIN OF COMMAND

Facility personnel must report emergency situations to Security, who will then notify the Shift Supervisor, who will assume the role of Initial Incident Commander. The Initial Incident Commander will contact the Environmental Liaison/Emergency Coordinator, as soon as practicable. A Emergency Response Flow Chart (Figure 3) has been developed and should be implemented during an emergency. The Emergency Response Flow Chart (available under the Safety tab of the DESCC intranet homepage: http://web.descc.com/new_site/index.php) will be posted in administration building, guard shack, waste water treatment building, shipping, receiving, entry, delivery, command pulpit, maintenance office, and the QA Lab.

2.6 DISTRIBUTION OF THIS RCRA CONTINGENCY PLAN

A current copy of this Contingency Plan and subsequent revisions will be maintained at the following facility locations:

- Support Services and Environmental Liaison's Office (Primary Emergency Coordinator);
- Main Gate Security;
- Training Room Cabinet – 1st Floor of Administration Building;
- Safety Office.

Following revisions, the above-listed copies will be updated and following major (significant) revisions, copies of this Contingency Plan will also be provided to the county and local emergency response agencies, local fire and police departments, hospitals (listed in Section 5.1), emergency response contractors (listed in Section 5.2) and the local, county, and state Emergency Management Agencies (if requested). The Contingency Plan will be reviewed and amended, if necessary, based on the criteria described earlier in Section 1.6.

3.0 SPILL AND LEAK PREVENTION AND RESPONSE

The DESCC facility will be maintained and operated to minimize the possibility of a fire, explosion or discharge of hazardous waste or hazardous waste constituents to air, soil, surface water or groundwater which could threaten human health or the environment, in accordance with requirements of 40 CFR Part 265.

3.1 PRE-RELEASE PLANNING

Materials that may be spilled or may leak during the electro-galvanizing process within the plant would either be confined in secondary containment or drain to the chemical building basement. Bermed areas located outside the plant have sumps that are pumped into the chemical building basement when necessary. Spilled or leaked materials or fluids are eventually pumped to the equalizer tank in the WWTP.

The following sections discuss specific locations at the facility where the potential exists for accidental spills of oils and/or chemicals. The controls that are in place to minimize the potential for an uncontrolled release to the environment are also discussed.

To enhance spill prevention at the facility, great care will be exercised in handling oil and other materials covered in this Contingency Plan. Any unusual conditions observed by any employees or contractors will be reported to one of the Emergency Response Coordinators. Management personnel whose responsibilities include involvement with the materials discussed in this document will also be familiar with this plan and the procedures recommended for spill prevention.

3.1.1 Oil Spill Prevention Measures

Procedures that are to be followed to prevent and/or minimize oil spills at the DESCC facility include:

- Aboveground storage tanks will be visually inspected regularly for leaks;
- Special care is taken when filling aboveground storage tanks to prevent spillage of oil during product transfer;
- 55-gallon drum storage areas will be visually inspected regularly for leaks;
- Oil drums are stored in protected locations to prevent them from being damaged by mobile equipment (such as forklifts);
- The drums are typically not stored in locations where they can come into contact with storm water;
- Drums are provided with secondary containment to contain potential spills;
- Absorbent and spill control materials are maintained on-site for emergency use;
- Emergency response personnel are familiar with procedures to follow in case of a spill;
- In cases where there may be leaking equipment or operations where oil or oil-related compounds are leaked, spilled, or otherwise released, containment booms or absorbent materials will be used.

For instances where there is a release of oil or petroleum substances, the response actions should be conducted consistent with the procedures described within the facility's Spill Prevention Control and Countermeasures (SPCC) Plan.

3.1.2 Other Chemical Storage Spill Prevention Measures

Other chemicals stored with in the facility's area are located in areas with containment and will not come into contact with storm water. Floor drains within the plant's buildings drain to the chemical building basement that will prevent potential release of these materials to offsite locations.

3.2 MATERIAL COMPATIBILITY

Construction materials used in the chemical aboveground storage tanks have been selected and designed to be compatible with the materials that are being stored. Tank construction information is summarized in Table 1.

3.3 INSPECTIONS AND MONITORING PROGRAM

An outline has been prepared for a program for routine preventive maintenance which includes inspection and maintenance of storm water management and control devices as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdown or failures resulting in discharges of pollutants to surface waters. A log of the inspection and corrective actions shall be maintained of file and shall be retained for three years. An example of the Preventative Maintenance Inspection Form is shown Section 6.1 of this report. The following non-structural controls have been selected for implementation:

- Sweeping of roadways, parking lots, and loading and unloading areas, and scrap side trimmer, as needed;
- Cleaning of Outfall 200 catch basin, when necessary;
- Daily outdoor tank and dikes inspection;
- Routine facility stormwater inspections in accordance with the SWPPP to address any housekeeping issues;
- Quarterly inspection and calibration for Outfall 200 flow meter, totalizer and rain gauge;
- Comprehensive stormwater inspections twice per year (at least 30 days apart) in accordance with the SWPPP; and
- Annual training of plant employees on RCRA Contingency Plan requirements.

Inspections are performed as part of the facility's SWPPP to check that controls are provided for potential spills or releases. These inspections provide valuable information to this RCRA Contingency Plan.

3.3.1 Comprehensive Site Inspection

The facility's NPDES permit requires a schedule for comprehensive site inspection to include visual inspections of equipment, plant areas, and structural pollution prevention and treatment controls to be performed at least once every six months. A report of the results of the comprehensive site inspection shall be prepared and retained for three years. The report shall identify any incidents of

non-compliance with the SWPPP or this permit. If there are no reportable incidents of non-compliance, the report shall contain a certification that the facility is in compliance with this permit. Specific dates should be identified in the SWPPP. An example of the Comprehensive Site Inspection Form is shown in Section 15.3 of the SWPPP. A comprehensive inspection will be completed twice per year in accordance with the SWPPP.

3.3.2 Annual Report

The NPDES permit requires that Double Eagle Steel Coating Co prepare an annual report discussing the effectiveness of the SWPPP. This report should include any changes that have been made, the reason for the changes, any spills that occurred, what actions were taken as result of the spill, inspection results, and any other information relevant to the SWPPP. The annual report is to be retained on site. It does not need to be submitted to the MDEQ. An example of the Annual Report Form is shown in Section 15.6 of the SWPPP.

3.3.3 Inspection Schedule

Double Eagle Steel Coating Company requires routine inspections of outside above ground bulk storage tanks and container storage areas. Inspections are documented and the records retained for a minimum period of three years. The following items will be inspected and reported on the inspection form:

- Visible leaks or cracks in tank or dike;
- Level in diked area;
- Overflow drains into dike area flowing;
- Leaking from inlet or discharge pipes;
- Operative gauges for waste cutoff/pressure;
- Level in tank (inches);
- Comments.

A visual inspection of storage tanks, process tanks and piping will be conducted on at least a quarterly basis. Inspection records are maintained using the AuditMatic software system by the Wastewater Treatment Plant Supervisor and the Environmental Liaison.

The following items will be visually inspected and reported on a monthly basis:

- Seams;
- Rivets;
- Bolts;
- Gaskets;
- Nozzle connection;
- Valves;
- Connected pipe lines;
- Tank supports storage racks.

If any inspected item shows leaks, signs of wear, or damage, the condition will be noted in the space provided. Also include any remarks pertinent to the condition. Note corrective actions taken on the inspection sheet along with an expected date of completion. The inspector's name and the date of the inspection must be on every inspection report.

The following inspections of outdoor tanks dikes will be done at least once each operating day:

- Discharge control equipment in good operating order?
- Tank appears to be free of corrosion or leakage of fixtures and seams?
- Containment structures (dikes and curbs) appear to be structurally sound and free from obvious signs of leakage?

Daily inspections must be recorded in an inspection log or summary and kept for at least three years from the date of inspection. At a minimum these records must include:

- The date and time of inspection;

- Name of the inspector;
- Notation of the observations made and any corrective actions taken.

3.3.4 Storm Water Management System

Surface water drainage channels, drainage trenches, culverts, and catch basins will be inspected approximately on a semi-annual basis to check that they are functioning properly. Storm-water inspections will include an evaluation of best management practices (BMPs), where appropriate. If applicable, erosion and sedimentation control measures will be implemented where there is the potential for sediment or soil particles to impact storm water quality. Repairs will be made, as necessary, following the site inspection.

In addition to the routine facility inspection and monitoring activities, qualified personnel will conduct comprehensive RCRA compliance evaluations approximately annually. The evaluation will address the following aspects associated with the storm water management system;

- Inspect storm water drainage areas for evidence of pollutants (e.g., oils, sediment fines, sediments, or other materials) entering the drainage system;
- Evaluate the effectiveness of existing control measures and whether additional measures are necessary;
- Observe structural measures, sediment controls, and other storm water best management practices for proper operation;
- Inspect control equipment, including spill response materials, necessary to implement aspects of the Contingency Plan.

Following the visual site inspection, a report containing the following information should be completed:

- Date of inspection;
- Person who performed inspection;
- Area inspected;

- Problems found;
- Steps taken to rectify problems.

Site inspection report forms are contained in the SWPPP. Completed inspection reports will be retained as part of the Contingency Plan for a period of at least three years.

3.3.5 Storage Tanks and Drum Storage Areas

The diesel storage tanks and oil drum tanks are located in an area of the facility that is accessed periodically throughout the day. Spills or leaks that may occur will be contained by secondary containment and noticed as part of routine facility operations and appropriate actions will be implemented. The inspections will include observation of spill and/or leaks and observations of the condition of associated secondary containment structures. Records for the inspections will be maintained in the AuditMatic software system. It should also be noted that oil drums are located inside buildings or under cover that will prevent their contact with storm water. Table 1 lists the storage tanks and drum storage areas and includes the tanks regulated by the SPCC Plan.

3.4 HOUSEKEEPING PROGRAM

Housekeeping is performed daily. The plant floor is swept, and spills or leaks are controlled and recycled into the system. Good housekeeping procedures are designed to maintain a clean, orderly facility with the intent to reduce the potential for significant materials to come in contact with storm water. An example of the Housekeeping Inspection Form can be seen in Section 6.2 of this plan. DESCC's housekeeping program establishes protocols for the proper handling of materials and maintenance of clean work areas. Specific steps taken under this program will include:

- Debris and/or sediment are removed as necessary;
- Regular refuse pickup and disposal;
- Proper filling and emptying of storage containers, tanks, and equipment to minimize spill potential;

- Periodic review of good housekeeping procedures in the employee-training program.

3.5 SECURITY

The facility is secured from entry from unauthorized parties and should have little potential for uncontrolled dumping or unauthorized discharge to the property storm sewers. The Facility Regional Site Location Map and Facility Diagram identify these locations in detail with respect to the surrounding neighborhood and existing property boundaries. The facility perimeter is fully enclosed by a chain link fence except for the main vehicle driveway entry gate. The main entry gate (No.1) is equipped as a security check point, which is manned and guarded twenty-four hours daily, three-hundred and sixty-five days a year. Anyone entering the complex on a non-emergency basis must first stop and be recognized by the guard on duty before being allowed to actually enter the facility. DESCC and routine DESCC on-site contractors are required to possess identification badges and/or a vehicle pass to enter the site. Individuals not in possession of a badge or vehicle ID pass can only enter and remain on the property when accepted and accompanied by a DESCC authorized management reprehensive.

The railroad gate (No. 3) at the north end of the facility is under continuous video surveillance monitored from the main gate guardhouse, and is closed and secured by a locked chain link fence until opened from within by Plant Security. Railroad gate (No. 4) located at the south end of the facility is also secured by a locked gate and is only opened by plant security at the request of DESCC management. This gate however, is managed by hourly patrols performed by plant security. It is opened as required for rail traffic or maintenance of the Eagle Pass Bridge. Gate No. 2 is located near adjacent to rail gate No. 3 and is constantly locked and used only for contingency purposes as an additional emergency vehicle entry point.

DESCC receives bulk chemical shipments only by entry though gate No. 1. Hazardous material shipments are monitored according to the facility safe job procedures and DOT site security plan. The facility rail system is used to only ship incoming steel raw coil and outgoing plated coils of steel. Consequently, DESCC does receive or store chemical rail cars on site. Incoming and out bound processed steel is also covered from the weather to protect the product from corrosion and

damage during transport; therefore product or stock steel should represent a low potential for impacting either on-site or off-site storm water.

3.6 EXTERNAL FACTOR PLANNING

External factors such as power outages, adverse weather conditions, floods, lightning strikes and employee strikes are anticipated to have little or no effect on human safety or the environment at the DESCC facility. In the event an uncontrollable external factor causes an emergency, a proper response will be implemented by the Emergency Coordinator.

Power outages should not lead to releases or affect public health and safety. In the event of a power outage, the plant will shut down. No releases would be expected. The basement within the Chemical Building is capable of storing the entire volume of liquid in the plant in case of a complete failure and/or an overflow situation.

3.6.1 Emergency Alarm Identification Sirens

Both continuous and intermittent alarms are utilized at DESCO. The weather alert alarm is a high pitch wailing continuous alarm that will drown out any use of the FEMCO internal communications system. The audible fire alarm is an intermittent diminishing wail. The FEMCO system is operational and audible during this alarm. Additional bells and strobe light alarms are used to supplement the two alarms listed above. Civil Defense notice alarms are based on the City of Dearborn Public Alarm System. The Fire Pump House is separately alarmed (supervisory alarm only) and is outfitted with an intermittent alarm. Facility personnel and Security personnel receive alarm recognition training, which includes the following:

Alarm Situation	Plant Alarm Sound	Local Alarm Sound
Fire Pull Station	Intermittent Diminishing Wail	Horn
Water Flow - Sprinkler - Standpipe/Hose	Intermittent Diminishing Wail	NA
Weather Alert	Continuous High Pitch Wail	Continuous High Pitch Wail
Smoke Detector - Computer Room - PCR Rooms	Intermittent Diminishing Wail	Buzzer
Line Start-Up or Stoppage	Single – 1 Minute Wail	NA
Overhead Crane Movement (Warning)	Intermittent Beeping	Wailing Sound
Fork Truck Back-Up	Intermittent Beeping	Intermittent Beeping
GCA Interlock	Strobe Light	Strobe Light

3.6.2 Serious Fire and Explosion Procedures

DESCC conducts annual training on fire prevention. Therefore, the majority of our employees are capable of using a fire extinguisher to put out minor fires. However, in the event of a serious explosion or fire, employees should immediately evacuate the building. Annual evacuation training will be held so that employees are familiar with the prescribed evacuation route. Evacuation procedures are described in Section 4.4. Evacuation Route maps are provided in Appendix C. General evacuation actions are:

1. Pull the fire alarm or notify Security ----- this should only be done prior to evacuation if the employee is not in immediate danger.
2. Evacuate the building using the evacuation route.
3. If Security has not been notified, contact them giving the location of the fire and details.
4. Proceed to designated evacuation assembly area, as defined in Section III Annex 3, Subsection 2.3.1 of this Plan.

<u>Security's Actions</u>

1. Contact the Dearborn Fire Department and Dearborn Emergency Medical Services, if needed.

2. Alert the Shift Supervisor to the location of the fire by using the plant communication system.
3. Contact the Emergency Coordinator and other designated employees.
4. Meet the Dearborn Fire Department and other Emergency Response agencies at the gate, and lead them to the location of the fire and/or explosion.
5. Provide assistance to the Emergency Coordinator.

3.6.3 Medical Emergency

If an employee has been seriously injured on company property or becomes ill, the Security Department should be immediately notified, giving as much detail as possible – type of injury, location of victim. The Security Officer receiving the call will immediately notify either the Emergency Medical Service (EMS) by dialing 9-911 or Oakwood Hospital at (313) 563-8958. The Officer receiving the call will remain at the gate so as to lead the responding unit to the appropriate location.

3.6.3.1 Interruption of Public Water Distribution System

In the event that there is a disruption of city water to DESCC, there is no immediate threat that the fire protection system will be inoperable. The water lines that feed our fire protection system are separate from the main water supply line, and it is tied into a specific external water line loop so that under normal water loss, DESCC is still able to activate its fire protection system, if necessary.

If there is an interruption of city water service, Management or the Shift Supervisor (on the afternoon and midnight shifts) will contact the City Water Department to determine the duration of the loss. In addition, the emergency response coordinator will consult with Management to develop a priority list for water usage if it becomes necessary to conserve supplies.

It is more than likely that production would continue during a short duration of water loss. The plant can be temporarily supplied with water via the fire loop water line, without jeopardizing

fire protection. However, if there is any likelihood that fire protection will be jeopardized, the above practice would cease. The emergency response coordination will follow NFPA guidelines for loss of fire protection. In addition, the Dearborn Fire Department will be notified. Management will decide whether or not to close the plant.

A description of Fire Emergency Equipment is provided in Section 4.5. Maps showing locations of fire protection and control systems are provided in Appendices D, E and I.

3.6.3.2 Loss of Electrical Power

Loss of electric power will immediately result in a loss of production, and this situation can also affect fire protection equipment such as alarms and fire pumps.

If there is a power outage, employees in the affected plant areas should immediately evacuate the plant via the evacuation route and assemble in the designated area. Evacuation procedures are provided in Section 4.4 and maps of evacuation routes and assembly points are located in Appendix C. Specific employees may be required to perform certain tasks to minimize damage to the equipment or personnel before evacuating.

DESCC will respond immediately to emergency requests from Detroit Edison to reduce electricity usage. Although such requests are expected to be very rare, the Emergency Coordinator should keep alert as to how such a reduction may impact the fire protection system.

If the power outage is local and involves only one building or area of the plant, the Emergency Coordinator will:

- As precisely as possible, determine the duration of the outage;
- With the appropriate personnel make sure that the problem or affected circuits are properly isolated and that repairs are underway;
- Determine that fire pumps, critical process equipment, and protective signaling systems are immediately activated once power is restored;

- Make sure that the operation of the diesel fire pumps, located at the southwest end of the Chemical Building, are monitored. Emergency generators should be acquired if needed and also be monitored;
- Check to be sure that circuits are properly repaired before they are restored to service.
- To the extent practicable, have the power load reduced to a minimum before power is restored.

If the power outage is widespread, as it is during an area-wide "blackout," the Emergency Coordinator should:

- Determine the magnitude of the outage and its estimated duration (see emergency phone contact list);
- Make sure the operation of pumps and any emergency generators are monitored;
- See that increased Security patrols are provided for property surveillance purposes;
- Take steps to ensure that the system will not overload when power is restored.

During periods of very heavy power usage, Detroit Edison may have to reduce voltage. This is commonly called a "brownout", and frequently occurs in urban areas during periods of high air conditioner usage. In the event of a brownout, the Emergency Coordinator will:

- To the extent required and allowable, see that electrical consumption is reduced (given the nature of our operation, this point may be non-applicable);
- Identify equipment which may be sensitive to low voltage, and take positive steps to prevent its damage.

3.6.3.3 Other Utility Failure

Utility failure could also affect our air pressure supply, steam supply and gas. Any one of the above failures could adversely affect both fire protection and production. If such a failure should occur, or if the available supply of any utility is less than what is normally required by DESCC, the Department Managers or their designees should:

- Establish the minimum quantities of the various utility required for maintaining proper fire protection, and have these quantities reserved;
- Carefully evaluate any proposed arrangements for using alternate fuels to be sure that the storage, transfer, and actual use conform to safe practices;
- In cold weather, if building temperatures are to be reduced, the Emergency Coordinator or designee should:
  (1) Establish controls to prohibit the use of unauthorized portable heating appliances on company property.
  (2) Make sure that there is sufficient heat to prevent sprinkler systems from freezing.
- If (continuous) process line or computer equipment is to be operated intermittently, evaluate the start up and shut down procedures to be sure that they are safe;
- If operations have been reduced due to a utility failure, fire watches will be implemented if appropriate, and the property will be secured.

3.6.4 Civil Disturbance

Alert Security immediately (313) 203-9888. Security will contact appropriate personnel, including:

Dearborn Police Department	911
Dearborn EMS	911

The Emergency Coordinator or other DESCC Manager will contact appropriate DESCC personnel, and the United Auto Workers (UAW) as appropriate.

Civil disturbances include the following: bomb threat, arson, vandalism, labor strike and riots. In dealing with such crisis, the Emergency Coordinator and/or DESCC Management will act quickly to prevent and/or minimize loss of life or limb, and to prevent damage to equipment.

In general, civil disturbances should be responded to in the following manner:

- Notify Security;
- Security or the Emergency Coordinator will immediately contact the Dearborn Police Department and other emergency response agencies as needed;
- Employees will be evacuated if needed, or be alerted to the potential danger;
- If the civil disturbance is a bomb threat, the employee receiving the call should obtain as much information as possible from the caller - size of package, the time the bomb will be activated, and the location. The employee should then immediately contact the Security Department. If a bomb threat is received, it is important that employees not panic, but rather employees should evacuate the building in an orderly manner.

3.6.5 Winter Storms

Winter storms can create several problems that may hinder management in its attempt to protect the well being of its personnel, and prevent damage to equipment. These problems may include:

- Hazardous walking (slippery conditions);
- Inaccessibility to valves, hydrants, fire hoses, and fire pumps;
- Roof collapsing due to excessive accumulation of ice and/or snow;
- Evacuation difficulties;
- Driving conditions which hamper emergency vehicles.

The Plant Manager is responsible for calling and alerting the contracted snow removal company to report to DESCC during a winter storm event.

Once it has been determined that an emergency condition exists, the Emergency Coordinator will coordinate such tasks as:

- Installing snow fences and marker poles at hydrants and fire protection control valves;

- Monitor continuous clean up procedures, such as: cleaning snow from exits and entrances, fire protection equipment and utilities; removing snow from roofs in areas subject to drifting; and, inspect and clear roof drains;
- Continue to monitor the National Weather Service.

After the storm has ended:

- An immediate damage assessment will be made and temporary repairs undertaken;
- The remaining snow will be removed, with priority given to valves, hydrants, pump houses, and fire Department access routes.

3.6.6 Tornadoes

It is customary for the National Weather Service to alert residents of impending bad weather by stating that there is a "WATCH" or "WARNING".

A tornado WATCH implies that conditions are such that a tornado is expected to develop. A tornado WARNING means that a tornado has been sighted and residents in the immediate area should take cover. Once a "WATCH" has been issued by the National Weather Service, a Security Officer will immediately alert the Shift Supervisor. The Security Officer will stay alert to updates from the National Weather Service. Immediately upon receiving a report that a tornado has been spotted in the area, the Security Officer will alert all employees of the approaching bad weather by using the Plant's FEMCO paging system.

In general, employees should go either directly to the closest designated safe area as described below and indicated throughout the plant on evacuation route maps. Employees, in the Process Building, Terminal Building and Coil Storage Building and Computer Room should go directly to the first floor of the Process Building, along the east wall, between columns 37B to 35B. Employees in the Wastewater Treatment Plant and Cooling Towers should assemble in the Wastewater Treatment Pulpit. Employees in the Landscape Building should go to the restroom.

Employees in the Administration Building should go to the vault or the restrooms on the first floor, or to the stairwell.

After the tornado has passed, search and rescue operations will begin immediately, if appropriate. In addition, the following actions should occur if needed.

- The ERT Leader (Shift Supervisor) along with the help of the Security Department will prepare a damage report and immediately submit it to the Operations/Maintenance Manager;
- The Maintenance Department upon receiving such a report will take immediate action to protect personnel and equipment from further harm (e.g. temporary repair or covering of openings in the buildings and clearing debris and water from roofs to prevent the roof from collapsing);
- The Emergency Coordinator or designee and/or Safety or Security personnel will check that the fire protection system is intact, and will be on the alert for possible fires or flooding;
- Salvage operations will be initiated only upon determination that all perils to human life are being dealt with. Such salvage operations will be undertaken by Maintenance and Engineering personnel or under their auspices;
- All plant personnel should exercise extreme caution around damaged power lines. Also, there should be no smoking or use of heat-producing devices until it has been determined that there has not been a release of flammable liquids or gases.

3.6.7 Safe Distances and Places of Refuge

3.6.7.1 Safe Distances

The first step toward gaining control of a hazardous substance spill or release by the Emergency Coordinator is to isolate unnecessary personnel from the problem area. As deemed appropriate and necessary, the Emergency Coordinator will relocate unprotected employees to a safe distance. In the initial phase of the incident, this decision will be made based on knowledge of

the hazardous substance and its hazards, and/or published guides such as DOT's "Emergency Response Guidebook".

3.6.7.2 Places of Refuge

DESCC has designated evacuation assembly areas for employees. Specific evacuation procedures are provided in Section 4.5. These areas depend upon wind direction and the degree of hazard. Employees will stay in the evacuation assembly areas until employees are verbally told to return to their work areas. Supervisors will account for their employees and report missing employees to the Emergency Coordinator. Security personnel will be assigned control points by the Emergency Coordinator and prevent employees from reentering the facility until informed by the Emergency Coordinator that it is safe to do so. In the event of a Fire Emergency reference Section 4.5.

3.7 EMPLOYEE TRAINING PROGRAM

The Michigan DEQ recommends that employees are trained at the time of hire, and annually thereafter. Employee training will be a major component for the success of the facility's RCRA Contingency Plan. The more knowledgeable employees are about the facility's RCRA Contingency Plan and what is expected of them, the greater the chance that the plan will be effective. An example Employee Training Form can be found in Section 6.3 of this plan and includes the date of session, trainers name, topics covered, and the attendees' names and signatures. DESCC conducts both initial and annual environmental training on a variety of topics. New hires and new contractors are given an initial emergency response (awareness level) training that includes information about facility emergency plans, safety precautions, and evacuation instructions. Annual employee training includes the following: Hazard Communication (Right to Know, MSDS, Labeling, Chemical Specifics); Refresher on Emergency Response-Awareness Level and Emergency Plans and Evacuation; Personal Protective Equipment; Fire Prevention; PIPP; SPCC; SWPPP; RCRA Contingency; and an overview of the ISO 14001 Environmental Management System.

The training program is designed to educate personnel to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment systems including, where applicable: procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment; key parameters for automatic cut-off systems; communications and alarms systems; response to fires and explosions; site evacuation procedures; and shutdown of operations.

In addition, the employee-training program addresses other aspects of the preparedness and response program, such as preventive maintenance, inspection and monitoring, and housekeeping practices. The training program is designed and conducted in accordance with applicable Department regulations. Records of employee attendance at training programs are maintained in the Administration Office.

The training programs are designed to educate facility personnel and visitors on how DESCC expects them to respond effectively to emergencies, by familiarizing them with emergency procedures and emergency equipment systems including:

- Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment;
- Communication and alarm systems;
- Emergency response;
- Site evacuation procedures;
- Operational shutdowns;
- Preventive maintenance;
- Inspection and monitoring;
- Housekeeping practices;
- Hazard identification.

To satisfy worker right-to-know training requirements, annual training programs will be conducted relevant to the materials present at the facility. Employees will be given detailed instructions regarding the materials and wastes with which they are working; including safety and health hazards, handling methods, proper disposal procedures, emergency procedures, and

access to Material Safety Data Sheets (MSDS). MSDS are maintained on the facility's intranet Qualtrax system, which is available to all employees.

4.0 COUNTERMEASURES

4.1 COUNTERMEASURES TO BE UNDERTAKEN BY FACILITY

The following sections present general spill response practices to be implemented at the DESCC facility.

4.1.1 Spill Clean-Up Procedures - General

Spill clean-up generally involves three steps: containment, removal, and disposal. In the event of a spill, it is very important that the material be contained to the maximum extent possible in order to minimize the effect of the spill and the cost of clean-up. Once the spill is contained, the spilled material and contaminated material must be collected and physically removed from the area. In some cases, with certain materials, it may be possible to neutralize a spilled material in place without removal. Finally, the spilled material and contaminated soil, clean-up material, etc., must be disposed of properly.

4.1.1.1 Oil and Oil-Related Materials

In dealing with an oil spill, the immediate response action is to attempt to eliminate the source of the spill as soon as possible. In the event of an accidental spill, emergency measures will be implemented by DESCC to isolate the spilled material and prevent the release from entering surface water or groundwater. Berms may be constructed to contain the spill, and/or excavation equipment may be used to promptly remove impacted soils, concrete, or asphalt. Storm water collection structures will be either blocked or pumped, if appropriate, to prevent the release to surface water.

Water impacted as a result of a spill will be pumped and containerized. Any soil or water that is impacted as a result of an accidental spill or release will be containerized for subsequent disposal. The typical cleanup procedure for the spilled oil is as follows:

- Remove sources of ignition;
- Contain the spill using whatever equipment and material are available. Oils captured within secondary containment should be recycled to the extent possible. In water, booms should be used to limit the spread of oil along the surface. On land, absorbent materials such as Oil-Dri, straw, sawdust, or soil should be used to soak up any free or flowing oil and limit its spread. The most important thing is to act quickly to limit the extent of the spill;
- Remove the oil soaked materials using the most effective means, whether it is by hand using shovels or heavy earth-moving equipment. Caution must be exercised in using construction equipment in and around streams to minimize the disturbance to the watercourse. It may be necessary to provide clean fill to reconstruct the affected areas after removal of the oil-contaminated soils;
- The oil-contaminated material removed in the clean-up operation must be disposed of properly. With the approval of DEQ, the contaminated material should be hauled to a waste disposal facility that is authorized by permit to accept this type of waste;
- Perform the notification and reporting/report preparation activities in a manner consistent with the SPCC Plan.

4.1.1.2 Other Materials

Spills or releases of other items could potentially occur at the facility. In the event of a release, these items would be contained entirely onsite. The response actions should generally follow the procedures set forth in the Quick Card in Appendix H. Additionally, materials that are impacted by the spill will require proper disposal in accordance with federal and Michigan laws and regulations.

4.2 COUNTERMEASURES TO BE UNDERTAKEN BY CONTRACTORS

The following companies can be contracted to provide additional specialized assistance during an emergency, should their services be required.

Company:	Vac-All Environmental Response Group
Address:	26705 Northline Rd. Taylor, Michigan 48180
Telephone Number:	734-941-4357
Response Time:	Approximately 60 minutes
Equipment and Services:	Hazardous Materials Emergency Response

4.3 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEM

This section describes the internal communications or alarm systems used to provide immediate emergency instruction (voice or signal) to installation personnel, and the external communications or alarm system used to summon emergency assistance from local police or fire departments. Fire, police, and emergency service can be summoned by calling the numbers shown in Section 5.1.

The DESCC facility is equipped with a telephone system that provides both internal and external communications in the event of an emergency. Telephones are located in the main office, and the emergency telephone numbers are posted by telephone.

Whenever hazardous waste is being poured, mixed, spread or otherwise handled at the DESCC facility, personnel involved in the operation will have immediate access to an onsite internal alarm or emergency communication device, either directly or through visual or voice contact with another employee. An employee working alone on the premises while the facility is operating will have immediate access to a device, such as a telephone, or a hand-held two-way radio, capable of summoning external emergency assistance.

4.4 EVACUATION PLAN

In the event of a fire or other emergency, the plant's fire alarm will sound, and all personnel will gather in the parking lot. Exits are clearly marked within the facility. The Emergency Coordinators and/or Environmental Liaison listed in Table 2 are responsible for verifying that all personnel are accounted for. The Fire Department will be notified immediately.

Periodic drills will be conducted, if necessary, to evaluate the effectiveness of this evacuation plan. In the event that the site must be evacuated, the Emergency Coordinator will alert personnel to report to the main office for attendance taking. Once the Emergency Coordinator has verified that all site workers are in attendance, the site will be evacuated.

If an emergency situation requires evacuation of personnel, the Emergency Coordinator will implement the following evacuation procedures.

1. The Emergency Coordinator will provide evacuation instructions to facility personnel via the plant communications network, as appropriate.
2. Personnel evacuation will typically proceed as follows:
    a. <u>If downwind of incident</u>: Evacuate via the most accessible route perpendicular to the prevailing wind direction.
    b. <u>If upwind of incident</u>: Evacuate in an upwind direction.
3. Personnel will reassemble at the front parking lot, or at another regrouping area that is upwind of the incident location, and remain at this location until the Emergency Coordinator has accounted for all personnel onsite.
4. The names of employees and the destination of employees transported to hospitals, etc. for treatment will be recorded by the Emergency Coordinator, first aid personnel or Fire Department officials.

Building exits at the facility are marked for rapid egress during an emergency. Appendix C shows the facility's evacuation information. Once on public roadways, evacuation routes are left up to the individual. Personnel are informed of these evacuation routes as part of their initial and subsequent training program and will be provided with updated information when there is a change in the procedures.

4.5 EMERGENCY EQUIPMENT AVAILABLE FOR RESPONSE

General locations of available emergency equipment are shown in Appendix G. Emergency equipment is tested and maintained as necessary to assure its proper operation in time of

emergency. In addition to the identified emergency equipment available for onsite use, an intercom system is used to alert personnel. The intercom system is loud enough to be heard above the equipment noises.

Areas where spillage may occur are controlled by the sloping concrete floors and drains. The spills will be conveyed to the chemical storage building which has the capacity to store the entire volume of the tanks in the process and chemical building. In the event of a leak, the fluid level in the chemical building basement is monitored by the EMC system and so would be detected. The emergency equipment is routinely cleaned after use and/or replaced.

This section also provides an up-to-date list of available emergency equipment, and procedures for maintenance and decontamination of emergency equipment. DESCC's emergency equipment at the facility will allow personnel to respond safely and quickly to emergency situations. Equipment will be tested and maintained, as necessary, to assure its proper operation in time of emergency. After an emergency, equipment will be decontaminated, cleaned, and re-fit for its intended use before normal operations resume.

The DESCC facility is equipped with the following, except where the hazards posed by materials handled at the facility do not require the particular kind of emergency response equipment:

1. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.
2. A device, such as a telephone, immediately available at the scene of operations, or a hand-held two-way radio capable of summoning emergency assistance from local Police Departments, Fire Departments or state or local emergency response teams.
3. Portable fire extinguishers, fire control equipment, including special extinguishing equipment such as that using foam, inert gas or dry chemical spill control equipment and decontamination equipment.
4. Water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems.

Seventeen spill response stations are strategically located throughout the plant. Specific locations for each station are provided in the spill response location map located in the emergency map binder, as well as in Appendix F, along with other emergency action items. Each station contains the necessary PPE and spill containment equipment for operational level first response. Each spill response station typically contains the following equipment:

ITEM	APPROXIMATE QUANTITY
Chemical Resistant Gloves	4
Full Face Shield Attachments	2
Saranex Suits – with attached boots	2
Chemical Splash Goggles	2
Hazmat Absorbent Socks	4 blue, 4 white, 4 pink
Hazmat Absorbent Pads	20 blue, 20 white, 20 pink
Rolls of Caution Tape	1
Spill Stopper for Drain*	1
Quick Card Manual	1

**Only maintained in outdoor locations, Door 13, and north end of coil storage.*

The contents of the spill response stations are audited approximately weekly by DESCC personnel. Where these spill response station audits identify that some spill response equipment has been used during the week, DESCC personnel will replenish the contents of the spill response station so that an adequate supply is available for future use.

In the event DESCC employees will be responding to a spill, the proper personal protective gear must be worn and applicable job safety and health analysis procedures followed. The circumstances and the nature of potential exposure will dictate the level of protective clothing that will be required. Typically, the following personal protective clothing and the response equipment are to be used when responding to a release of oil:

- Disposable neoprene gloves;
- Disposable Tyvek coveralls;
- Disposable heavy gauge plastic boots with tie straps;
- Approved eye protection;
- Approved respirator and filters.

A chemical-specific review of personal protection needs should be completed by a Safety Department representative prior to response to ensure adequate protection of responders. A sufficient supply of appropriate containment and response equipment is maintained and available onsite, within close proximity to potential spill areas. There should be no time restrictions in gaining access to this equipment, as this material is located onsite, in direct proximity to potential spill areas. Personnel involved in handling oil and petroleum substances have been trained in the use of response materials and are familiar with spill kit locations. Additional emergency equipment is available at the three safety cabinets, which are located inside Door 12 of the wastewater treatment plant, adjacent to column B-C 20 in the Terminal Building, and adjacent to column B 54 in the Spare Parts Building. Copies of the safety cabinet weekly audit forms with equipment inventories are included for reference as Appendix I. At times there may be reduced quantities of materials in the safety cabinets due to employee use of various items. Although supplies are audited and replenished weekly, the Safety Department should be contacted if equipment is needed and is not readily available prior to performing work.

If a major release occurs at the site and an evacuation is required, Appendix C shows the facility's evacuation information. Occupants of DESCC will be notified of an evacuation by a site-wide alert system. When the alert tone is activated, no other communication should occur. The controls for the site-wide alerts can only be operated at the Guard House located at the main gate on Miller Road.

Fire extinguishers are located throughout the facility in strategic locations to simplify the response to fires and extinguish small fires quickly. Appendix E shows the locations of extinguishers throughout the facility. The extinguishers are checked routinely and serviced. Further information pertaining to fire protection can be found in Appendix D. If the fire alarm is activated, the signal will be received at the Guard House and Command Pulpit. Communication to the security officer will occur via site-wide radio on Channel 4. The guard must call 911 to report the incident to the Dearborn Fire Department. The site-wide notification will then be activated using FEMCO.

5.0 EMERGENCY SPILL CONTROL NETWORK

5.1 ARRANGEMENTS WITH LOCAL EMERGENCY RESPONSE AGENCIES AND HOSPITALS

This section provides a list of local emergency response agencies and hospitals, and associated phone numbers. Arrangements will be made, as appropriate, to inform local emergency response agencies, and hospitals concerning the type of materials handled at the DESCC facility and the potential need for services.

Arrangements will be made to designate who will be the primary emergency response agency and who will provide support services during emergencies. Efforts will be made to familiarize police, fire departments, emergency response teams, and the Wayne County Local Emergency Planning Committee with the layout of the installation, the properties and dangers associated with the hazardous materials handled, places where personnel would normally be working, entrances to roads inside the facility, and the possible evacuation routes.

Agreements with hospitals and emergency response agencies will be made and included in the periodic updating or amending of the Contingency Plan. The agreements and/or arrangements include efforts to familiarize area agencies and emergency responders with facility operations and potential emergency operations. The following agencies will be contacted and provided with a copy of this Contingency Plan, whenever significant plan revisions occur, at the discretion of the DESCC Emergency Coordinator:

- Local fire companies;
- Local county emergency response personnel;
- Local ambulance personnel;
- Local hospital.

Outlined below are the local emergency response agencies to be contacted in the event of an emergency or reportable spill. In the unlikely event that a widespread emergency exists, the

Wayne County Local Emergency Planning Committee would be contacted first, and the coordinator in turn could contact appropriate emergency response agencies through their communications network. The nearest hospital is Oakwood Hospital located on Mercury Drive in Dearborn, MI. The nearest fire and police departments are located in the city of Dearborn.

LOCAL EMERGENCY RESPONSE AGENCIES TO BE CONTACTED

Fire Department – City of Dearborn	9-1-1 or (313) 943-2277
Police Department – City of Dearborn	9-1-1 or (313) 277-7408
Wayne County LEPC	(734) 941-8937
Ambulance Service	9-1-1
Oakwood Hospital 4900 Mercury Drive #201, Dearborn, MI 48126	(313) 982-4351

The agencies outlined in the Agency Notification List below should be contacted, as appropriate, following an emergency, accident or chemical release. Routing of injured persons will be performed by emergency medical services personnel based on the number and type of injuries requiring treatment. The emergency medical services coordinator will be provided with a copy of this Contingency Plan to assist in planning.

AGENCY NOTIFICATION LIST

• National Response Center	(800) 424-8802
• MI Department of Environmental Quality (Lansing)	(517) 373-9837
• Pollution Emergency Alerting System	(800) 292-4706
• MI DEQ Southeast District Office	(586) 753-3700
• City of Dearborn Emergency Management	(313) 943-5470
• Wayne County LEPC	(734) 941-8937
• City of Dearborn Police Department	9-1-1 or (313) 277-7408
• City of Dearborn Fire Department	9-1-1 or (313) 943-2277
• U.S. Environmental Protection Agency, Region V	(312) 886-3000
• U.S. Coast Guard National Response Center	(800) 424-8802
• U.S. Coast Guard Detroit Office	(313) 568-9580
• Detroit Water and Sewer Department	(313) 224-4775
• Chemical Transportation Emergency Center: Chemical Exposure Information	(800) 424-9300
• Regional Poison Information Center (Detroit)	(313) 745-5711

5.2 ARRANGEMENTS WITH EMERGENCY RESPONSE CONTRACTORS

If necessary and appropriate, DESCC may use the following company to support the emergency response efforts:

Company:	Vac-All Environmental Response Group
Address:	26705 Northline Rd. Taylor, Michigan 48180
Telephone Number:	734-941-4357
Response Time:	Approximately 60 minutes
Equipment and Services:	Hazardous Materials Emergency Response

Vac-All will also be provided with a copy of this Contingency Plan.

5.3 NOTIFICATION LISTS

Verbal notifications and written notifications should be performed as described previously within Sections 2.3 and 2.4 of this RCRA Contingency Plan.

6.0 EXAMPLE FORMS

6.1 PREVENTATIVE MAINTENANCE INSPECTION FORM

Date:	Time:

Inspector	
Print:	Signature:

Areas Inspected	**Observation**	**Actions Taken**

6.2 HOUSEKEEPING INSPECTION FORM

Date:	Time:

Inspector	
Print:	Signature:

Areas Inspected	**Observation**	**Actions Taken**

6.3 EXAMPLE EMPLOYEE TRAINING FORM

DOUBLE EAGLE
STEEL COATING COMPANY

Date and Time of Session:

Trainer	
Print:	Signature:

Topics Covered:

Attendee Name	**Attendee Signature**	**Position/Title**

6.4 SPILL OR RELEASE REPORT FORM

DEQ

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

SPILL OR RELEASE REPORT

NOTE: Some regulations require a specific form to use and procedures to follow when reporting a release. Those forms and procedures **MUST** be used and followed if reporting under those regulations. This report form is to aid persons reporting releases under regulations that do not require a specific form. This report form is not required to be used. **To report a release, some regulations require a facility to call the PEAS Hotline at 800-292-4706, or DEQ District Office that oversees the county where it occurred, and other regulating agencies and provide the following information. A follow-up written report may be required. Keep a copy of this report as documentation that the release was reported. If you prefer to submit this report electronically by FAX or e-mail, contact the regulating agency for the correct telephone number or e-mail address.** See the DEQ website on Spill/Release Reporting for more reporting information.

Please print or type all information.

NAME AND TITLE OF PERSON SUBMITTING WRITTEN REPORT | TELEPHONE NUMBER (provide area code)

NAME OF BUSINESS

STREET ADDRESS

CITY | STATE | ZIP CODE

BUSINESS TELEPHONE NUMBER (provide area code)

RELEASE LOCATION (provide address if different than business, if known, and give directions to the spill location. Include nearest highway, town, road intersection, etc.)

SITE IDENTIFICATION NUMBER AND OTHER IDENTIFYING NUMBERS (if applicable) | COUNTY | TOWNSHIP | TIER/RANGE/SECTION (if known)

RELEASE DATA. Complete all applicable categories. Check all the boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary.

DATE & TIME OF RELEASE (if known) / / am/pm

DATE & TIME OF DISCOVERY / / am/pm

DURATION OF RELEASE (if known)
- ____ days
- ____ hours
- ____ minutes

TYPE OF INCIDENT
- ☐ Explosion
- ☐ Fire
- ☐ Leaking container
- ☐ Loading/unloading release
- ☐ Pipe/valve leak or rupture
- ☐ Vehicle accident
- ☐ Other ____

MATERIAL RELEASED (Chemical or trade name) ☐ CHECK HERE IF ADDITIONAL MATERIALS LISTED ON ATTACHED PAGE.	CAS NUMBER or HAZARDOUS WASTE CODE	ESTIMATED QUANTITY RELEASED (indicate unit e.g. lbs, gals, cu ft or yds)	PHYSICAL STATE RELEASED (indicate if solid, liquid, or gas)

FACTORS CONTRIBUTING TO RELEASE
- ☐ Equipment failure
- ☐ Operator error
- ☐ Faulty process design
- ☐ Training deficiencies
- ☐ Unusual weather conditions
- ☐ Other ____

SOURCE OF LOSS
- ☐ Container
- ☐ Railroad car
- ☐ Pipeline
- ☐ Ship
- ☐ Tank
- ☐ Tanker
- ☐ Truck
- ☐ Other ____

TYPE OF MATERIAL RELEASED
- ☐ Agricultural: manure, pesticide, fertilizer
- ☐ Chemicals
- ☐ Flammable or combustible liquid
- ☐ Hazardous waste
- ☐ Liquid industrial waste
- ☐ Oil/petroleum products or waste
- ☐ Salt
- ☐ Sewage
- ☐ Other____
- ☐ Unknown

MATERIAL LISTED ON or DEFINED BY
- ☐ CAA Section 112(r) list (40 CFR Part 68)
- ☐ CERCLA Table 302.4 (40 CFR Part 302)
- ☐ EPCRA Extremely Hazardous Substance (40 CFR Part 355)
- ☐ Michigan Critical Materials Register or permit
- ☐ NREPA Part 31, Part 5 Rules polluting material
- ☐ NREPA Part 111 or RCRA hazardous waste
- ☐ NREPA Part 121 liquid industrial waste
- ☐ Other list ____
- ☐ Unknown

IMMEDIATE ACTIONS TAKEN
- ☐ Containment
- ☐ Dilution
- ☐ Evacuation
- ☐ Hazard removal
- ☐ Neutralization
- ☐ System shut down
- ☐ Diversion of release to treatment
- ☐ Decontamination of persons or equipment
- ☐ Monitoring
- ☐ Other ____

RELEASE REACHED
- ☐ Surface waters (include name of river, lake, drain involved) ____ Distance from spill location to surface water, in feet____
- ☐ Drain connected to sanitary sewer (include name of wastewater treatment plant and/or street drain, if known) ____
- ☐ Drain connected to storm sewer (include name of drain or water body it discharges into, if known) ____
- ☐ Groundwater (indicate if it is a known or suspected drinking water source and include name of aquifer, if known) ____
- ☐ Soils (include type e.g. clay, sand, loam, etc.) ____
- ☐ Ambient Air
- ☐ Spill contained on impervious surface

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EXTENT OF INJURIES, IF ANY	WAS ANYONE HOSPITALIZED? ☐ Yes NUMBER HOSPITALIZED: ___ ☐ No	TOTAL NUMBER OF INJURIES TREATED ON-SITE:

DESCRIBE THE INCIDENT, THE TYPE OF EQUIPMENT INVOLVED IN THE RELEASE, HOW THE VOLUME OF LOSS WAS DETERMINED, ALONG WITH ANY RESULTING ENVIRONMENTAL DAMAGE CAUSED BY THE RELEASE. IDENTIFY WHO IMMEDIATELY RESPONDED TO THE INCIDENT (own employees or contractor — include cleanup company name, contact person, and telephone number). ALSO IDENTIFY WHO DID FURTHER CLEANUP ACTIVITIES, IF PERFORMED OR KNOWN WHEN REPORT SUBMITTED

☐ CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

ESTIMATED QUANTITY OF ANY RECOVERED MATERIALS AND A DESCRIPTION OF HOW THOSE MATERIALS WERE MANAGED (include disposal method if applicable)

☐ CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

ASSESSMENT OF ACTUAL OR POTENTIAL HAZARDS TO HUMAN HEALTH (include known acute or immediate and chronic or delayed effects, and where appropriate, advice regarding medical attention necessary for exposed individuals.)

☐ CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFIED:

INITIAL CONTACT BY: ☐ Telephone ☐ Fax ☐ Email ☐ Other

DATE/TIME INITIAL CONTACT: _____

☐ PEAS: 800-292-4706 Log Number Assigned _____

☐ DEQ District or Field Office

- ☐ Baraga
- ☐ Bay City
- ☐ Cadillac
- ☐ Crystal Falls
- ☐ Detroit
- ☐ Gaylord
- ☐ Grand Rapids
- ☐ Gwinn
- ☐ Jackson
- ☐ Kalamazoo
- ☐ Lansing
- ☐ Newberry
- ☐ Warren
- ☐ Wyoming

DEQ Office locations are subject to change

Divisions or Offices Contacted:

- ☐ Air Quality
- ☐ Land & Water Management
- ☐ Office Geological Survey
- ☐ Remediation and Redevelopment
- ☐ Waste and Hazardous Materials
- ☐ Water Bureau

NAME AND TITLE OF PERSON MAKING INITIAL REPORT:

DEQ STAFF CONTACTED & PHONE NUMBER:

OTHER ENTITIES NOTIFIED:

	Date:	Time:
☐ National Response Center (NRC): 800-424-8802		
☐ US Coast Guard Office: ☐ Detroit ☐ Grand Haven ☐ Sault Ste. Marie		
☐ US Department of Transportation		
☐ US Environmental Protection Agency		
☐ 911 (or primary public safety answering point)		
☐ Local Fire Department		
☐ Local Police and/or State Police		
☐ Local Emergency Planning Committee		
☐ State Emergency Response Commission via MI SARA Title III Program		
☐ Wastewater Treatment Plant Authority		
☐ Hazmat Team		
☐ Local Health Department		
☐ Department of Labor & Economic Growth MIOSHA		
☐ Department of Labor & Economic Growth Fire Safety		
☐ Michigan Department of Agriculture: 800-405-0101		
☐ Other _____		

PERSON CONTACTED & PHONE NUMBER:

DATE WRITTEN REPORT SUBMITTED	SIGNATURE OF PERSON SUBMITTING WRITTEN REPORT

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7.0 CERTIFICATION FORM

1. Facility and Owner Identification:

   Double Eagle Steel Coating Company
   3000 Miller Road
   Dearborn, Michigan 48120

2. Management Approval:

   Full approval is extended by management at a level with authority to commit the necessary resources.

   Date: _____ Signature:_____
   Name: Jason Pond
   Title: Plant Manager

3. Management Certification:

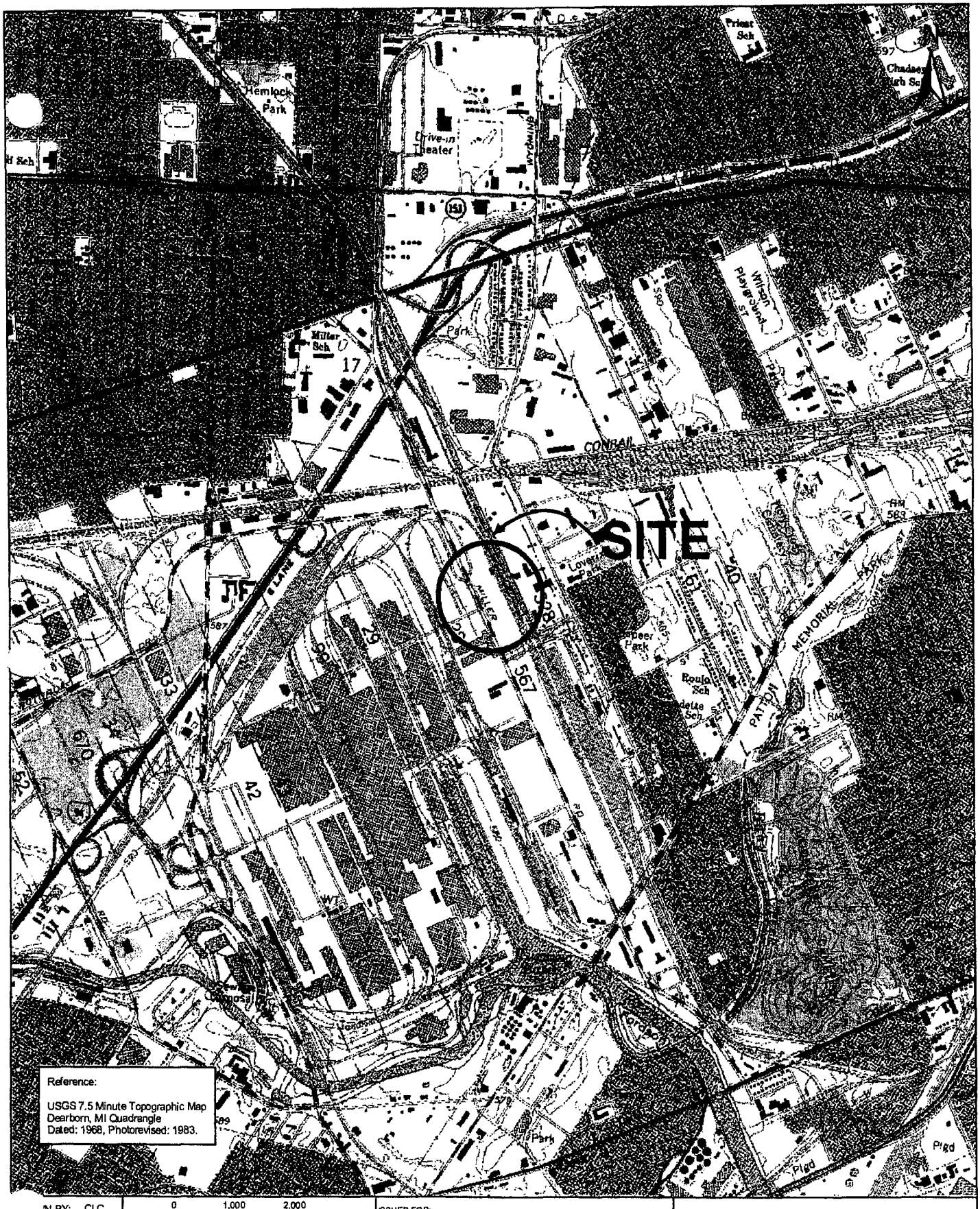
   I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who will manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

   Date: _____ Signature: _____
   Name: Jason Pond
   Title: Plant Manager

4. Professional Engineer's Certification

I hereby certify that I have examined the facility and being familiar with provisions of the Michigan Department of Environmental Quality Regulations in Michigan Rule R299.9101-299.12701, 40 Code of Federal Regulations (CFR) Parts 260 through 265, and other applicable regulations, attest that this Resource Conservation and Recovery Act (RCRA) Contingency Plan has been prepared in accordance with good engineering practices.

Date: _____ Signature: _____
Name: Angelo L. Masullo, Jr.
Registration No.:
State: Commonwealth of Michigan



N BY: CLC	0 1,000 2,000 Feet	ISSUED FOR:	SITE LOCATION MAP DOUBLE EAGLE STEEL COATING COMPANY WAYNE COUNTY, MICHIGAN
CHECKED BY: PWT		ISSUED BY: CEC CIVIL & ENVIRONMENTAL CONSULTANTS, INC. 333 Baldwin Road Pittsburgh, PA 15205-9702 1-800-365-2324 Columbus, OH * Cincinnati, OH * Indianapolis, IN * Nashville, TN * Chicago, IL * St. Louis, MO * Essex, PA * Detroit, MI * Phoenix, AZ	
APPROVED BY:			
SCALE: 1" = 2,000'			
DATE: 12/9/2008			PROJECT NO.: 082-244 FIGURE: 1

J:\Projects\2008\082244\maps\082244_site_location_map.mxd - 12/11/2008 @ 3:46:31 PM

Double Eagle Steel Coating Company
ENTIRE PLANT & OUT BUILDINGS
FIRE PROTECTION, [illegible] EQUIPMENT

Figure 2

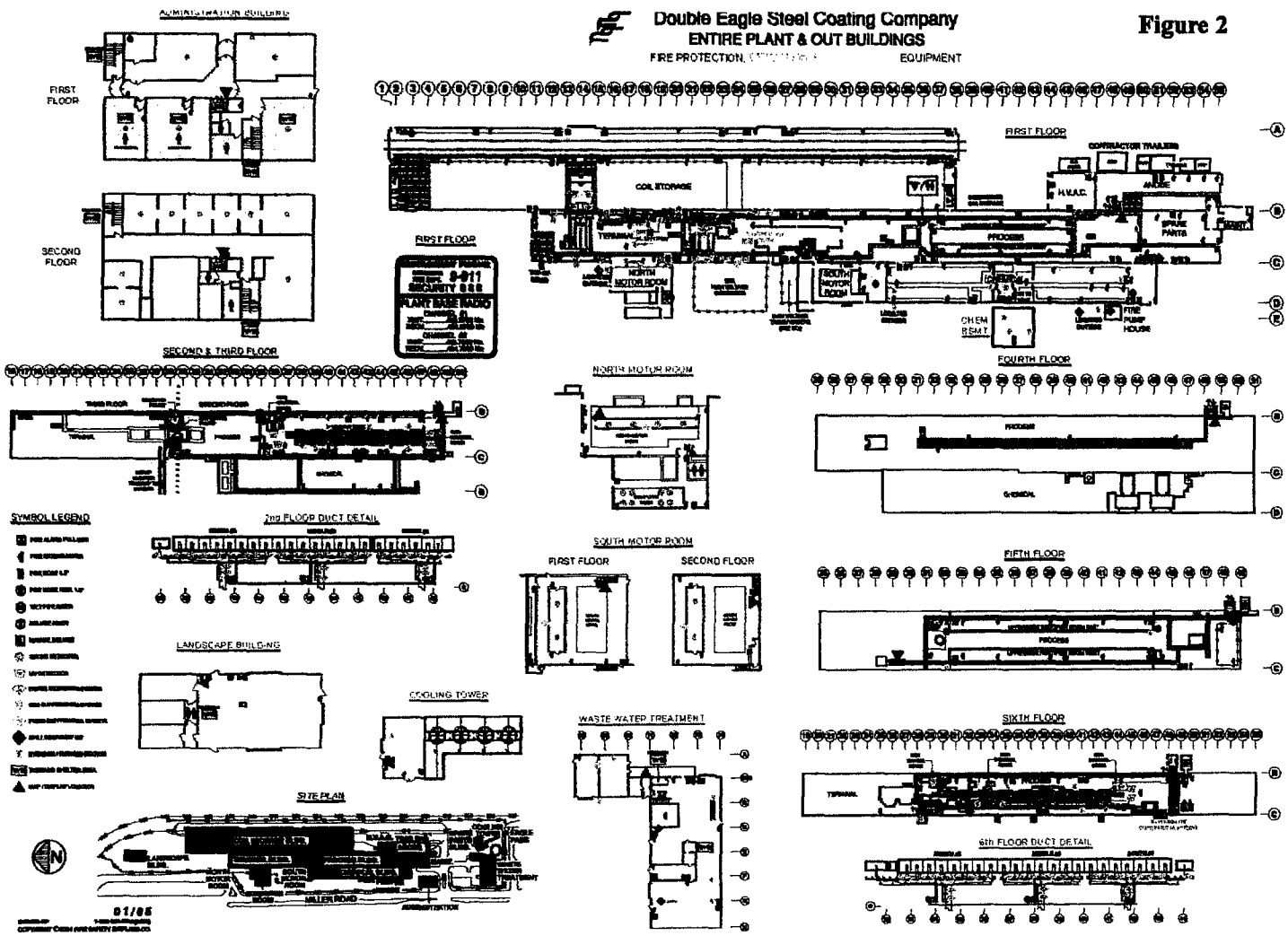


Table 1
Chemical Storage Tank and Material Inventory

TANK #	TANK NAME	LOCATION IN PLANT AND CODE (WHERE)	TANK CAPACITY (gallons)	TANK CONTENTS	TANK CONSTRUCTION MATERIAL	2° SECONDARY CONTAINMENT MATERIAL	SECONDARY CONTAINMENT VOLUME (gallons)	OVERFLOW PROTECTION	HIGH LEVEL ALARM	LOW LEVEL ALARM	WHERE DO DRAINS IN THE AREA LEAD?	CONDITION OF LIGHTING IN AREA	WARNING SIGNS POSTED	CONTAINMENT FOR LOADING/ UNLOADING AREAS	THRESHOLD MANAGEMENT QUANTITY (lbs)	THRESHOLD REPORTING QUANTITY (lbs)
1	2% Recirculation Tank	Process Building, 1st Floor	2,500	Hydrochloric Acid, Water	Fiberglass	Yes - dike	x	No	Yes	Yes	Chemical Bldg Basement	Good	Yes	N/A	2,200	10
2	Alloy Mix Tank - Abandoned	Chemical Building	10000 (Abandoned)	Plating Solution: citric acid, ferrous chloride, hydrochloric acid, potassium chloride, USSPX, and zinc chloride	RTR	Yes - Basement	978,000	No	No	Yes	N/A	Good	N/A	N/A	N/A	N/A
3	Zinc Chloride Storage Tank	Tank Farm	15,000	ZnCl2	RTR	Yes - dike	29,530	No	No	No	Chemical Building Basement	Moderate	Yes	Yes - concrete berms	440	100
4	Ferrous Chloride Storage Tank	Tank Farm	20,000	FeCl2	RTR	Yes - dike	29,530	No	Yes	Yes	Chemical Building Basement	Moderate	Yes	Yes - concrete berms	440	10
4A	Ferrous Chloride Day Tank	Chemical Building - West Wall Center	500	FeCl2	N/A	Yes - Building	N/A	N/A	N/A	N/A	Chemical Building Basement	Good	N/A	N/A	2,200	10
5	USSP Storage Tank	Tank Farm	6,000	USSPX, potassium chloride, polyethylene glycol and boric acid	RTR	Yes - dike	29 530	No	No	No	Chemical Building Basement	Moderate	Yes	Yes - concrete berms	440	50
6	Scrubber Tank (previously zinc mix tank)	Chemical Building	10,000	Scrubber Water with HCl, ZnCl2, and KCL	RTR	Yes - basement	978,000	No	No	Yes	Chemical Building Basement	Good	Yes	N/A	2,200	1
7	Caustic Storage (Horizontal) - Abandoned	Chemical Building - West Wall Center	2000 (Abandoned)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	Hydrochloric Acid Storage Tank	Tank Farm	15,000	Hydrochloric Acid	RTR	Yes - dike	29,530	Yes -yellow brim with pipe to containment	No	No	Chemical Building Basement	Moderate	Yes	Yes - concrete berms	440	500
9	Hydrochloric Acid Storage Tank	Tank Farm	15,000	Hydrochloric Acid	RTR	Yes - dike	29,530	Yes -yellow brim with pipe to containment	Yes	Yes	Chemical Building Basement	Moderate	Yes	Yes - concrete berms	440	500
8 & 9	Hydrochloric Acid Storage Tanks	Tank Farm	30,000	Hydrochloric Acid	RTR	Yes - dike	29,530	Yes -yellow brim with pipe to containment	No	No	Chemical Building Basement	Moderate	Yes	Yes - concrete berms	440	500
10	Pickle Circulating Tank	Process Building, 5th Floor	5,000	Hydrochloric Acid, Dissolved Iron	RTR	Yes - dike	x	No	Yes	Yes	Chemical Building Basement	Moderate	Yes	N/A	2,200	10
11	Spent Pickle Liquor Dump Holding Tank	Tank Farm	10,000	Hydrochloric Acid, water, and particulate cleaned from incoming steel (regulated as Hazardous Waste)	RTR	Yes - dike	x	No	Yes	No	Chemical Bldg Basement	Poor	Yes	Yes - concrete berms and a sump trench	440	100
12	HCD Cleaner Waste Tank	Outside in Waste Tank Area	20,000	Sodium Hydroxide, Water, and Oil	Steel (last integrity test: 2004)	Yes - dike	28,500	No	Yes (at 75%)	No		Good	Yes	Yes - concrete berms	2,200	100
13	Upper deck Keystone Headwater Cooling Tank	Process Building, 5th Floor	2,100	Hot Water	Rubber Lined Steel	Yes - dike, overflow to Process Bld. Basement	x	No	Yes	Yes	Catch Basin to Process Bld. Basement	Good	Yes	N/A	2,200	100
14	Lower deck Keystone Headwater Cooling Tank	Process Building, 2nd Floor	3,250	Hot Water	Rubber Lined Steel	Yes- dike, overflow to Process Bld. Basement	x	No	Yes	Yes	Catch Basin to Process Bld. Basement	Good	Yes	N/A	2,200	100
15	HCD Concentrate Storage Tank	Terminal Building Entry	6,000	Sodium Hydroxide, Formula 818 DE	Steel	Yes - dike, overflow to Process Bld. Basement	x	Must stick tank before filling	Yes	Yes	Catch Basin to Process Bld. Basement	Good	Yes	N/A	2,200	100
15A	HCD Recirculation Tank (under floor)	Terminal Building Entry	20,000	Formula 503-10, Process Water	Steel	Yes - under floor, connects to chem building basement	978,000	No	Yes	Yes	Process Bld. Basement	Moderate above ground, Poor below ground	No	N/A	440	100
15B	HCD Cleaner Rinse Transfer Sump	Terminal Building Entry	3,500	Water, Residuals from HCD Rinse Tank	Steel	Yes - under floor, connects to Process Bld. Basement	x	No	Yes	Yes	Process Bld. Basement	Good	Yes	N/A	2,200	100
16	HCD Keystone Water Cooling (Removed)	N/A - Removed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Lime Slurry Tank	Wastewater Treatment Plant	1,000	Water and Lime	Steel	Yes - dike, drains to spillway	x	Will shut off automatically at 58"	Yes	Yes	Spillway to the equalization tank	Good	Yes	N/A	2,200	N/A
17A	Lime Silo	Outside Wastewater Treatment Plant	100 tons	Lime	Steel	No - however pavement is sloped to a drain	N/A	No	Yes (at 80%)	Yes	City Sanitary Sewer	Poor	No	No - sloped pavement to drain	440	N/A
17B	Alkalinization Tank	Wastewater Treatment Plant	820	Water, Metals, Caustic Soda or Lime	Steel	Yes- steel grated trench to spillway	280,000	Overflows into Clarifiers #1 and #2	No	No	WWTP Spillway	Good	Yes	N/A	2,200	1
18	#1 Oxidation Tank	Wastewater Treatment Plant	10,000	Diluted solution of wastewater and acid or base	RTR	Yes - floor open to main spillway which leads to equalization tank	280,000	Overflows into tanks #2 and #3, flow determined by equalization tank (always at max capacity)	No	No	WWTP Spillway	Moderate	Yes	N/A	2,200	1

Table 1
Chemical Storage Tank and Material Inventory
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TANK #	TANK NAME/ ID	LOCATION IN PLANT AND COUNTY	TANK CAPACITY (Gallons)	TANK CONTENTS	TANK CONSTRUCTION MATERIAL	SECONDARY CONTAINMENT MATERIAL	SECONDARY CONTAINMENT VOLUME (Gallons)	OVERFLOW PROTECTION	HIGH LEVEL ALARM	LOW LEVEL ALARM	WHERE DO DRAINS IN THE AREE GO?	CONDITION OF LOADING/ UNLOADING AREA	WARNING SIGNS POSTED	CONTAINMENT FOR LOADING/ UNLOADING AREAS	THRESHOLD MANAGEMENT QUANTITY (TMQ) LBS	THRESHOLD REPORTING QUANTITY (TRQ) LBS
19	# 2 Oxidation Tank	Wastewater Treatment Plant	10,000	Diluted solution of wastewater and acid or case	RTR	Yes - floor open to main spillway which leads to equalization tank	280,000	Overflows into tank #3, flow determined by equalization tank (always at max capacity)	No	No	WWTP Spillway	Moderate	Yes	N/A	2,200	1
20	#3 Neutralization Tank	Wastewater Treatment Plant	9,000	Diluted solution of wastewater and acid or base	RTR	Yes - floor open to main spillway which leads to equalization tank	280,000	Flows into clarifiers, flow determined by equalization tank (always at max capacity)	No	No	WW TP Spillway	Moderate	Yes	N/A	2,200	1
21	Waste Water Equalization Tank	Outside Wastewater Treatment Plant	280,000	All plant overflows, spills, releases of all chemical and/or oils	RTR	No - however pavement is sloped to a drain	N/A	No	Yes	Yes	Spillway	Moderate	No	N/A	440	1
22	Sulfuric Acid Day Tank (removed)	Wastewater Treatment Plant	200 (removed)	Sulfuric Acid (removed)	Steel	Yes - steel grated drains to spillway	280,000	Must be filled manually	No	No	WWTP Spillway	Poor	No	N/A	N/A	N/A
23	Effluent Monitoring Tank	Wastewater Treatment Plant	3,200	Wastewater (pH automatically measured)	Steel	Yes - steel grated drains to spillway	280,000	Flows into Rouge River (with proper pH) and into equalizer (with poor pH)	Yes	Yes	WWTP Spillway	Moderate	Yes	N/A	2,200	1
24	Waste Oil Tank	Wastewater Treatment Plant	660	Wastewater skimmed off top of clarifiers	Steel	Yes - dike and spillway drains	280,000	Constantly drains into spillway through a filter	Yes	Yes	WWTP Spillway	Moderate	No	N/A	2,200	50
25	Sludge Thickener Tank	Wastewater Treatment Plant	20,000	Sludge, Water	Steel	Yes - steel grated drains to spillway	280,000	Visually Monitored	No	No	WWTP Spillway	Moderate	Yes	N/A	2,200	1
26A	Ferrocote Tank #1 / Electrostatic strip oil	Chemical Building-1st Floor	15,000	EGL-1 Oil	Steel	Yes - dike	1,200	No	No	No	Spills Cleaned Up	Moderate	Yes	N/A	2,200	50
26AD	Coating Oil Storage - Day Tank	Terminal Building Delivery	200	EGL-1 Oil	Steel	Yes - dike	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2,200	50
26B	Ferrocote Tank #2 / Electrostatic strip oil	Chemical Building-1st Floor	15,000	Prelube Oil	Steel	Yes -dike	1,200	No	No	No	None - spills need pumped	Moderate	Yes	N/A	2,200	50
26BD	PreLube Oil Storage - Day Tank	Terminal Building Delivery	53	Prelube Oil	Steel	Yes - dike	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2,200	50
27	Zinc Electrolyte Roll Spray Tank	Chemical Building	1,300	Zinc Plating Solution, zinc metal, hydrochloric acid, zinc chloride, ferric chloride, ferrous chloride, citric acid	RTR	Yes - drains to chem building basement	978,000	Overflows to Zinc Electrolyte Recirculating Tank	No	Yes	Chemical Building Basement	Good	Yes	N/A	2,200	1
28A	Alloy Electrolyte Roll Spray Tank	Chemical Building - West Center	700	Alloy Plating Solution: zinc metal, hydrochloric acid, zinc chloride, potassium chloride, and USSPX	RTR	Yes - drains to chem building basement	978,000	Overflows to Alloy Electrolyte Recirculating Tank	No	Yes	Chemical Building Basement	Moderate	Yes	N/A	2,200	1
28B	Alloy Soln Roll Spray	Chemical Building - West Center	1,170	Alloy Solution	RTR	Yes - drains to chem building basement	978,000	Overflows to Alloy Electrolyte Recirculating Tank	No	Yes	Chemical Building Basement	N/A	N/A	N/A	2,200	100
29	Zinc Electrolyte Storage Tank	Chemical Building	20,000	Zinc Plating Solution, zinc metal, hydrochloric acid, zinc chloride, ferric chloride, ferrous chloride, citric acid	Concrete with Polypropylene Lining	Yes - drains to chem building basement	978,000	Overflows to Waste Acid Sump	Yes	Yes	Chemical Building Basement	Moderate	Yes	N/A	2,200	1
30	Alloy Electrolyte Storage Tank	Chemical Building	20,000	Alloy Plating Solution: zinc metal, hydrochloric acid, zinc chloride, potassium chloride, and USSPX	Concrete with Polypropylene Lining	Yes - drains to chem building basement	978,000	Overflows to Waste Acid Sump	Yes	Yes	Chemical Building Basement	Moderate	Yes	N/A	2,200	1
31	HCl Day Tank	Inside Process Building	800	Hydrochloric Acid	RTR	Yes - concrete dike on platform and surrounding walls	x	Overflows into Chemical Bld Basement sump	No	No	Chemical Bldg Basement	Moderate	No	N/A	2,200	10
32	Scrubber Tank (Removed)	Removed	10,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
34	HCD Non Contact Cooling Water (Removed)	Removed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
35	Steam Condensate Tank (Deaerpmeat Feed)	Chemical Building South	700	Steam Condensate	Steel	Chemical Bldg Basement	978,000	No	Yes	Yes	Chemical Bldg Basement	N/A	N/A	N/A	N/A	N/A
36	Inhibitor (Removed)	WWTP (Removed)	2,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 1
Chemical Storage Tank and Material Inventory

TANK #	TANK NAME	LOCATION OF TANK/TANK ID CODE NO.	TANK CAPACITY (Gallons)	TANK CONTENTS	TANK CONSTRUCTION MATERIAL	SECONDARY CONTAINMENT MATERIAL	SECONDARY CONTAINMENT VOLUME (Gallons)	OVERFLOW PROTECTION	HIGH LEVEL ALARM	LOW LEVEL ALARM	WHERE DO DRAINS IN THE AREA LEAD?	CONDITION OF LIGHTING IN AREA	WARNING SIGNS POSTED	CONTAINMENT FOR LOADING/UNLOADING AREAS	THRESHOLD MANAGEMENT QUANTITY (TMQ) (lbs)	THRESHOLD REPORTING QUANTITY (TRQ) (lbs)
37	Cooling Water Cold Well	WWTP Pump house	108,000	Water, Particles of Zinc or Alloy Metals	Concrete	Yes - dike	x	Feed by hot well - overflow would return to hot well	Yes	Yes	WWTP Spillway	Good	Unable to tell	N/A	440	1
38	Cooling Water Hot Well	WWTP Pump house	350,000	Water, Particles of Zinc or Alloy Metals	Concrete	Yes - dike	x	Automatic shut off for pumps	Yes	Yes	WWTP Spillway	Good	Unable to tell	N/A	2,200	1
39	HCD Scrubber Tank	Outside N Motor Room	183	HCD Solution and Water from Scrubber	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	440	100
43	HCD Used Oil and Water Tank/Recycle oil	Outside Terminal Building Tank Farm	8,200	Sodium Hydroxide, Oil, Water	RTR (last integrity test: 6/2012)	Yes - dike	x	No	Yes (75%)	No	None - sump to be pumped OR to Ultra Filtration	Poor	Yes	Yes - concrete berms and a sump	440	50
44	Used Oil and Water Tank	Outside Terminal Building Tank Farm	4,100	Sodium Hydroxide, Oil, Water	RTR (last integrity test: 6/2012)	Yes - dike	x	No	Yes (75%)	No	None - sump to be pumped OR to Ultra Filtration	Poor	Yes	Yes - concrete berms and a sump	440	50
45	Sulfuric Acid Storage Tank	WWTP Storage Area	5,000	Sulfuric Acid (97%)	Steel	Yes - dike	12,118	No	Yes	Yes	WWTP Spillway	Good	Yes	Yes - concrete dike with sump to spillway	2,200	100
46	Caustic Soda Storage Tank	WWTP Storage Area	12,000	Caustic Soda	Steel	Yes- dike	14,383	No	Yes	Yes	WWTP Spillway	Good	Yes	Yes - concrete dike with sump to spillway	N/A	N/A
47	Sulfuric Acid Day Tank	WWTP	130	Sulfuric Acid	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	2,200	100
48	Waste Oil Separator (Horiz)	Outside Terminal Building Tank Farm	6,200	Water, Oil, Phosphate Cleaner, Sludge	Steel (last integrity test: 6/2012)	Yes - dike	x	No	No	No	Pumped Out	Moderate	Yes	Yes - concrete berms with sump to WWTP	440	50
49	Centrifuge Sludge Tank (Abandoned)	Outside Terminal Building Tank Farm	(Abandoned)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
50	Wesero 315 Brush Tank	Process Building	3,000	Water, Caustic Soda	Steel	Yes - steel grates below drain to Process Bld. Basement	x	No	No	No	Process Bld. Basement	Good	No	N/A	2,200	50
50A	Wesero 315 Recirculation Tank (Under Floor)	Process Building	2,060	Water, Caustic Soda Residuals	Steel	Yes - under floor, connects to chem building basement	978,000	No	Yes	Yes	Process Bld. Basement	Moderate above ground, Poor below ground	No	N/A	2,200	50
51	Ultrafilter Process Tank - West Entry Basement	Terminal Building Entry	1,200	Oil/Water Solution	Steel	Process Basement	N/A	N/A	Yes	Yes	Process Bld. Basement	N/A	N/A	N/A	2,200	100
52	Ultrafilter Process Tank - East Entry Basement	Terminal Building Entry	1,200	Oil/Water Solution	Steel	Process Basement	N/A	N/A	Yes	Yes	Process Bld. Basement	N/A	N/A	N/A	2,200	100
53	Recycle Oil Transfer Tank - Electrostatic Oil's	Terminal Building Entry	112	Oil	Steel	Yes - dike	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2,200	50
54	Entry Basement - 1,500 Gallon Collection Tank	Terminal Building Basement	1,500	Fluids Collection	Steel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2,200	50
55	KCL Silo	West Tank Farm	190 Tons	KCl	Steel	No - however pavement is sloped to a drain	N/A	No	Yes (75%)	No	Chemical Building Basement	Moderate	No	No - sloped pavement to drain	440	500
60	Alloy Solution Tank	Process Building	42,900	Alloy Plating Solution	RTR	Yes - dike, drains to chem building basement	978,000	No	No	No	Chemical Building Basement	Good	Yes	N/A	2,200	1
70	Alloy Solution Tank	Chemical Building	36,256	Alloy Plating Solution	RTR	Yes - drains to chem building basement	978,000	Automatic shut off if filled about designated liquid level (monitored by bow el tank)	No	No	Chemical Building Basement	Good	Yes	N/A	2,200	1
71	Underworld Floor Drain Tank (Removed)	Chemical Bldg Snake Pit	13,530 (Removed)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
72	Waste Acid Sump	Chemical Bldg Snake Pit	15,400	All Waste Acid from Plant	Steel	Yes - under floor, connects to chem building basement	978,000	Flows to WWTP	Yes	No	Chemical Building Basement	Unable to tell	Unable to tell	N/A	2,200	100
73	Waste Water Sump	Chemical Bldg Snake Pit	15,400	All Wastewater from Plant	Steel	Yes - under floor, connects to chem building basement	978,000	Flows to WWTP	Yes	No	Chemical Building Basement	Unable to tell	Unable to tell	N/A	2,200	1
75	Diesel Fuel Tank (Horiz.)	Anode Annex Bldg Outside	1,000	Diesel Fuel	Steel	Yes - dike	1,278	No	No	No	None	Good	Yes	Yes - concrete dike with sump	440	50
76	Propane Storage Tank (Horiz.)	Landscape Outside	1,990	Propane - used to heat landscape building	Steel	No	N/A	No	No	No	None	Poor	Yes	No	N/A	N/A
77	Filter Press Precoat Tank	Chemical Bldg. North	1,235	Filter Press Precoat Tank	Fiberglass	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2,200	100
78	Filter Press Body Feed Tank	Chemical Bldg. North	1,235	Filter Press Body Feed Tank	Fiberglass	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2,200	100
80	HCD Additive 503-20 (Abandoned)	Terminal Bldg. North	4,400	Formula 503-20	Steel	Yes - steel grated drains to chem building basement	978,000	No	Yes	Yes	Process Bld. Basement	Moderate	Yes	N/A	N/A	N/A
81	Coating Oil Storage - Fuchs MetalLube	Terminal Bldg. North	4,400	Fuchs MetalLube Solution (Coating Oil)	Steel	N/A	N/A	N/A	No	No	Process Bld. Basement	N/A	N/A	N/A	2,200	50
81D	Coating Oil Storage Day Tank	Terminal Bldg. North	800	Fuchs MetalLube Solution (Coating Oil)	Steel	N/A	N/A	N/A	No	No	Process Bld. Basement	N/A	N/A	N/A	2,200	50

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100	Alloy Recirculation Tank	Chemical Building	274,000	Alloy Plating Solution	Concrete with Polypropylene Lining	Yes - under floor, connects to chem building basement	978,000	No	Yes	Yes	Chemical Building Basement	Good above ground, Poor below ground	Yes	N/A	2,200	1
200	Zinc Recirculation Tank	Chemical Building	274,000	Zinc Plating Solution	Concrete with Polypropylene Lining	Yes - under floor, connects to chem building basement	978,000	No	Yes	Yes	Chemical Building Basement	Good above ground, Poor below ground	Yes	N/A	2,200	1
CL-1	Clarifier #1	WWTP Outside	63,400	Wastewater	Steel	No - small concrete dike but ground is not paved	N/A	Visually monitored every shift	No	No	None	Good	Yes	N/A	440	1
CL-2	Clarifier #2	WWTP Outside	63,400	Wastewater	Steel	No - small concrete dike but ground is not paved	N/A	Visually monitored every shift	No	No	None	Good	Yes	N/A	440	1
CL-3	Clarifier #3	WWTP Outside	102,000	Wastewater	Steel	No - small concrete dike but ground is not paved	N/A	Visually monitored every shift	No	No	None	Good	Yes	N/A	440	1
~	HCD Rinse Tank	Process Building	0 - open to WWTP sump	Water, HCD Cleaner Residuals	Steel	Yes - dike which drains to chem basement	x	No - not a closed tank, so unable to overflow	No	No	Process Bld. Basement	Good	No	N/A	2,200	100
~	HCD Cleaner Tank	Process Building	0 - connected to HCD Recirculation Tank	Sodium Hydroxide	Steel	Yes - dike	x	No - not a closed tank, so unable to overflow	No	No	Process Building Basement	Good	Yes	N/A	2,200	100
~	HCD Additive Tank	Process Building	80	Hot Caustic Soda	Steel	Yes - steel grated drains to Process Bld. Basement	x	No	x	x	Process Bld. Basement	Good	Yes	N/A	2,200	100
~	Plater Rinse Tank #2	Process Building, 2nd Floor	0 - open to WWTP sump	Water, Plater Solution Residuals	Steel	Yes - steel grated drains to Process Bld. Basement	x	No - not a closed tank, so unable to overflow	No	No	Chemical Bld. Basement	Good	No	N/A	2,200	500
~	Pickle Strip Tank	Process Building, 8th Floor	1,300	Alloy and Zinc Plating Solution	Steel	Yes - steel grated drains to Process Bld. Basement	x	No	No	No	Chemical Bld. Basement	Good	Yes	N/A	2,200	500
~	Plater Rinse Tank #1	Process Building, 8th Floor	0 - open to WWTP sump	Water, Plater Solution Residuals	Steel	Yes - steel grated drains to Process Bld. Basement	x	No - not a closed tank, so unable to overflow	No	No	Chemical Bld. Basement	Good	No	N/A	2,200	500
~	Pickle Rinse Tank	Process Building, 8th Floor	0 - open to WWTP sump	Water, Pickle Strip Residuals	Steel	Yes - steel grated drains to Process Bld. Basement	x	No - not a closed tank, so unable to overflow	No	No	Chemical Bld. Basement	Good	No	N/A	2,200	500
~	Diesel Fuel Tanks (2 tanks of 125-gallons each)	Fire Pump House	250	Diesel Fuel	Steel	Yes - steel grated sump	x	Automatic shut off when fuel level gets too low	No	No	Fire Pump House Sump	Good	Yes	Yes - in pump house with sump	440	50
~	Texaco Oil Tank	Spare Parts, C49	450	Texaco Rando Oil HD46	Steel	Yes- plastic spill pan	N/A	No	No	No	N/A	Good	Yes	N/A	2,200	50
~	Alpha Oil Tank	Spare Parts, B51	3,500/lbs	Alpha 2000 HD#2	Steel	No	N/A	No	No	No	N/A	Good	Yes	N/A	2,200	50

Table 1
Chemical Storage Tank and Material Inventory
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CONTAINER # or PROCESS	DESCRIPTION OF CONTAINER/MATERIAL (E.G. RAIL RAISER, 2000 GAL. TANK)	LOCATION IN PLANT AND CONTAINER TYPE	CONTAINER CAPACITY (GALLONS)	CONTAINER CONTENTS/MATERIAL	CONTAINER CONSTRUCTION MATERIAL	SECONDARY CONTAINMENT AND MATERIAL	SECONDARY CONTAINMENT VOLUME (GALLONS)	OVERFLOW PROTECTION	HIGH LEVEL ALARM	LOW LEVEL ALARM	WHERE DO DRAINS IN THE AREA LEAD?	CONDITION OF LIGHTING IN AREA	IS WAREHOUSE SECURE?	CONTAINMENT FOR LOADING/UNLOADING AREAS	THRESHOLD MANAGEMENT QUANTITY (TMQ) LBS	THRESHOLD MANAGEMENT QUANTITY (TMQ) LBS
DSA-1	Drum Storage Area #1	Outside Doors 8 & 8A	55	Oils	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
DSA-2	Drum Storage Area #2	Inside Spare Parts, B50 & B51	55	Oils	Steel	Yes- plastic spill pans	x	Yes	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
DSA-3	Drum Storage Area #3	Terminal Bldg.	55	Oils	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
EF-1	Effluent Sand Filter #1	WWTP Inside	4,171	Wastewater	Steel	Yes, Inside WWTP	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
EF-2	Effluent Sand Filter #2	WWTP Inside	4,171	Wastewater	Steel	Yes, Inside WWTP	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
H 01-46	Entry End hydraulic unit	Terminal Building -1st Floor, C12/13	500	Mobil DTE-25 (or equivalent)	Steel	Trench below hydraulic unit drains to Process Bldg Basement	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 01-02	Entry Conveyor / Entry Walking Beam hydraulic unit	Terminal Building -1st Floor, C13/14	500	Mobil DTE-25 (or equivalent)	Steel	Trench below hydraulic unit drains to Process Bldg Basement	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 01-18	#1 Entry Payoff Fife / # 1 Payoff Center Guide hydraulic unit	Terminal Building -1st Floor, C13/14	100	Mobil DTE-25 (or equivalent)	Steel	Trench below hydraulic unit drains to Process Bldg. Basement	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 01-38	#2 Entry Payoff Fife / # 2 Payoff Center Guide hydraulic unit	Terminal Building -1st Floor, C15	100	Mobil DTE-25 (or equivalent)	Steel	Trench below hydraulic unit drains to Process Bldg. Basement	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 05-34	Delivery or Exit End hydraulic unit	Terminal Building -1st Floor, C19	500	Mobil DTE-25 (or equivalent)	Steel	Trench below hydraulic unit drains to Process Bldg. Basement	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 05-21	No. 2 Tension Reel Fife / #2 Tension Reel/Edge hydraulic unit	Terminal Building -1st Floor, C21/22	100	Mobil DTE-25 (or equivalent)	Steel	Delivery Basement	x	No	N/A	N/A	Delivery Basement	Adequate	N/A	N/A	2,200	50
H 05-09	No. 1 Tension Reel Fife / #1 Tension Reel / Edge hydraulic unit	Terminal Building -1st Floor, C21/22	100	Mobil DTE-25 (or equivalent)	Steel	Delivery Basement	x	No	N/A	N/A	Delivery Basement	Adequate	N/A	N/A	2,200	50
H 02-02	#1 Fife Steering / #1 SU N-S / #1 S.R. Steering hydraulic unit	Terminal Building -1st Floor, C24	40	Mobil DTE-25 (or equivalent)	Steel	N/A	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 02-05	#3 Fife Steering / #3 SU N-S / #3 S.R. Steering hydraulic unit	Terminal Building -1st Floor, C27/28	40	Mobil DTE-25 (or equivalent)	Steel	N/A	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 05-04	#5 Fife Steering / #5 SU N-S / #5 S.R. Steering hydraulic unit	Terminal Building -1st Floor, C29/30	40	Mobil DTE-25 (or equivalent)	Steel	Concrete dike	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
H 02-04	#2 Fife Steering / #2 SU N-S / #2 S.R. Steering hydraulic unit	Terminal Building -1st Floor, C27	40	Mobil DTE-25 (or equivalent)	Steel	N/A	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
-	#6 Fife Steering / #6 SU N-S / #6 S.R Steering hydraulic unit	Terminal Building -1st Floor, C30	~50-75	Mobil DTE-25 (or equivalent)	Steel	N/A	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
-	Delivery Conveyor / Exit/Delivery Walking Beam hydraulic unit	Terminal Building -1st Floor, B26	~500	Mobil DTE-25 (or equivalent)	Steel	Trench below hydraulic unit drains to Delivery Basement	x	No	N/A	N/A	Delivery Basement	Adequate	N/A	N/A	2,200	50
-	Hydraulic Unit for #5 set @ #2PR / Slit Set #2 Plater Rinse hydraulic unit	Terminal Building -1st Floor, 928	~15	Mobil DTE-25 (or equivalent)	Steel	No secondary containment	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
-	Lower Deck Pushrod hydraulic unit	Process Building - 1st Floor, C48	~110	Mobil DTE-25 (or equivalent)	Steel	Concrete dike drains	x	No	N/A	N/A	No	Adequate	N/A	N/A	2,200	50
-	Lower Deck Rearord / Slit station hydraulic unit	Process Building - 2nd Floor	~110	Mobil DTE-25 (or equivalent)	Steel	Concrete dike drains	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50

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CONTAINER #/IDENTIFIER	CONTAINER/MATERIAL NAME	LOCATION (PLANT AND COLUMN NO.)	CONTAINER CAPACITY (GALLONS)	CONTAINER CONTENT/MATERIAL	CONTAINER CONSTRUCTION MATERIAL	SECONDARY CONTAINMENT AND MATERIALS	SECONDARY CONTAINMENT VOLUME (GALLONS)	OVERFLOW PROTECTION	HIGH LEVEL ALARM	LOW LEVEL ALARM	HLS WHERE DO TRUCKS IN THE AREA LEAVE?	CONDITION OF LIGHTING IN AREA	WARNING SIGNS POSTED	CONTAINMENT FOR LOADING & UNLOADING AREAS	THRESHOLD MANAGEMENT QUANTITY (TMQ) LBS	THRESHOLD REPORTING QUANTITY (TRQ) LBS
-	Anode Room Squaring/Cemering Table hydraulic unit	Process Building - 2nd Floor	~150	Mobil DTE-25 (or equivalent)	Steel	None	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
-	#4 Fife Steering hydraulic unit	Process Building -5th Floor, C46	~55	Mobil DTE-25 (or equivalent)	Steel	Trench below hydraulic unit	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
-	Upper Deck Pushrod hydraulic unit	Process Building - 5th Floor by S elevator	~110	Mobil DTE-25 (or equivalent)	Steel	Concrete dike	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
	Upper Deck Rasnord / Upper Deck Tilt Station hydraulic unit	Process Building - 5th Floor by S elevator	~110	Mobil DTE-25 (or equivalent)	Steel	Concrete dike	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
-	Hydraulic Unit for #5 set @ #1PR hydraulic unit	Process Building -5th Floor, B44	~15	Mobil DTE-25 (or equivalent)	Steel	No secondary containment	x	No	N/A	N/A	N/A	Adequate	N/A	N/A	2,200	50
Pump-1	Diesel fuel	Firehouse	125	Diesel Fuel	Double wall steel	Contained in building with raceded floor	x	Automatic shut off when fuel level gets too low	N/A	N/A	WWTP	Good	Yes	Yes- in pump house	2,200	50
Pump-2	Diesel fuel	Firehouse	125	Diesel Fuel	Double wall steel	Contained in building with raceded floor	x	Automatic shut off when fuel level gets too low	N/A	N/A	WWTP	Good	Yes	Yes- in pump house	2,200	50
Trans - 101	Transformer	Switchyard North of Chemical Building	1,504	Mineral Oil	Steel	Yes -concrete berm with protected drain	>1655	Dow imbiber-beads valve	N/A	N/A	WWTP	Good	Yes	N/A	440	50
Trans - 201	Transformer	Switchyard North of Chemical Building	1,504	Mineral Oil	Steel	Yes -concrete berm with protected drain	>1655	Dow imbiber-beads valve	N/A	N/A	WWTP	Good	Yes	N/A	440	50
Trans - 301	Transformer	Switchyard North of Chemical Building	1,504	Mineral Oil	Steel	Yes -concrete berm with protected drain	>1655	Dow imbiber-beads valve	N/A	N/A	WWTP	Good	Yes	N/A	440	50
Trans - 401	Transformer	Switchyard North of Chemical Building	1,504	Mineral Oil	Steel	Yes -concrete berm with protected drain	>1655	Dow imbiber-beads valve	N/A	N/A	WWTP	Good	Yes	N/A	440	50
-	Waste oil holding sump	Wastewater Treatment Plant Building	750	Oil	Concrete	Spillway to equalization tanks	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	Quaker Ferrocote EGL 1-ST	Process C27	1,088lbs	Oil	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	2 Totes of Quaker Formula 57 DE	Process/Terminal Bldg	330	Potassium Hydroxide	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
-	2 Totes of Hydro-Zone	Terminal Bldg.	600	Sodium Hydroxide and Potassium Hydroxide	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
-	2 Totes of UltraPlex Grease	Process/Terminal Bldg.	660	Petroleum	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	(20) 5-gal pails of DTE Mobil Light	Process/Terminal Bldg.	100	Petroleum	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	Quaker Ferrocote 61 MAL-HCL	Process/Terminal Bldg.	110	Petroleum	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	AFL Hexon 700 Coolacer	Process/Terminal Bldg.	700	Trisodium Phosphate	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	440	500
-	Quaker Ferrocote EGL 1	Process/Terminal Bldg.	330	Mineral Oil	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	Texaco-Meropa 150, 220, 320, 460	Process/Terminal Bldg.	220	Highly Refined Mineral Oil	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	Solvo Clean 75 XLF	Process/Terminal Bldg	330	Sodium Hydroxide	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
-	UltraPlex Greases	Process/Terminal Bldg.	300	Petroleum Oil	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	Texaco - Oil HD 46	Process/Terminal Bldg.	900	Petroleum Oil	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	Drums - zinc	Process Bldg. 6th Floor	550	Zinc	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
-	Chemtool Alpha 2000, 2000 HD	Process/Terminal Bldg.	330	Oil	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
-	Citric Acid Anhydrous	Process/Terminal Bldg.	330	Acid	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100

Table 1
Chemical Storage Tank and Material Inventory

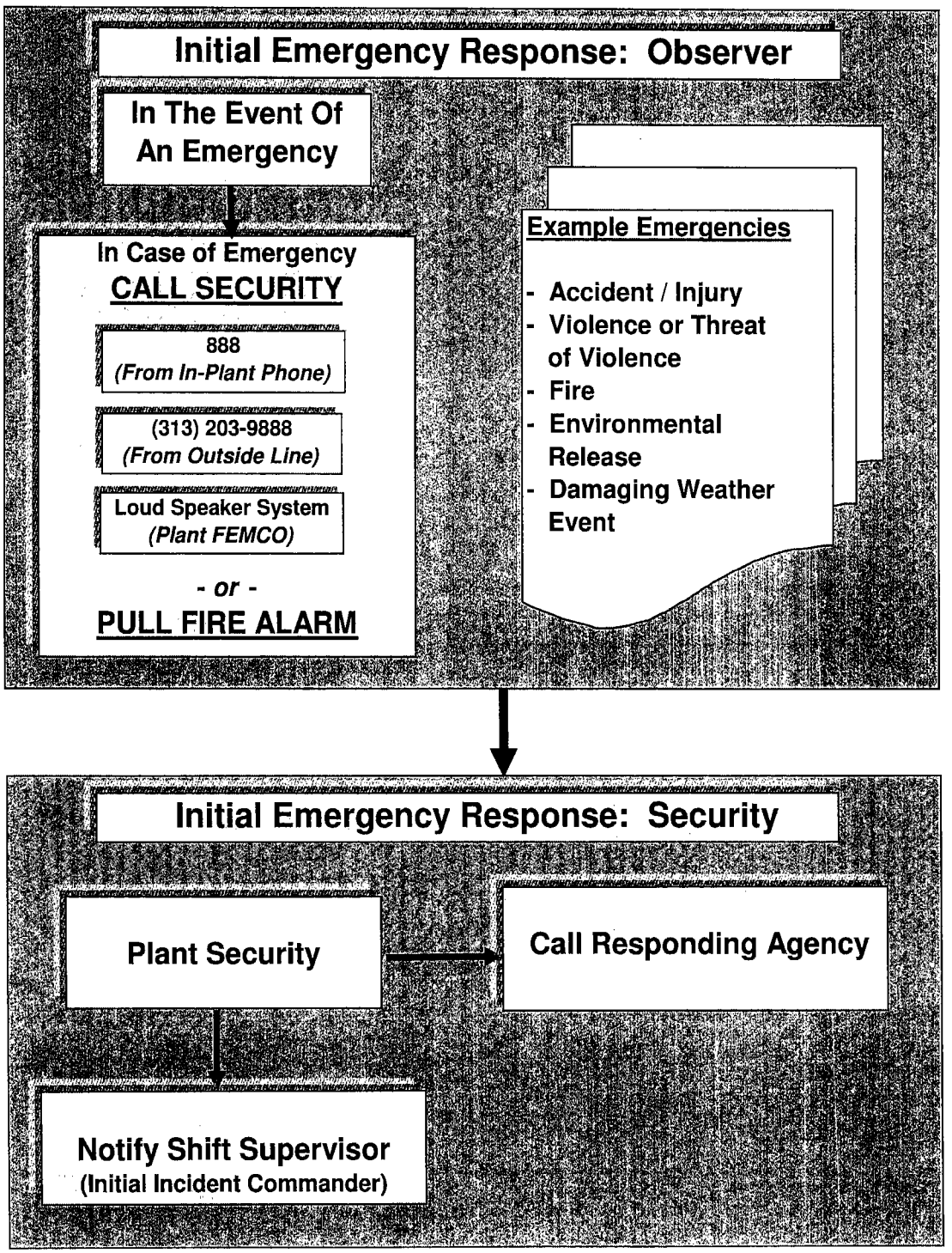
CONTAINER # (IF APPLICABLE)	CONTAINER/TANK DESCRIPTION	LOCATION (INCLUDE AND/OR COUNTY)	CONTAINER CAPACITY (GALLONS)	CONTAINER CONTENT/MATERIAL	CONTAINER CONSTRUCTION MATERIAL	SECONDARY CONTAINMENT MATERIALS	SECONDARY CONTAINMENT VOLUME (Gallons)	OVERTOP PROTECTION	HIGH LEVEL ALARM	LOW LEVEL ALARM	WHERE DO DRAINS IN THE AREA LEAD?	CONDITION OF LIGHTING IN AREA	WASHING MONS POSTED	CONTAINMENT FOR LOADING/ UNLOADING AREAS	THRESHOLD MANAGEMENT QUANTITY (TMQ) LBS	THRESHOLD REPORTING QUANTITY (TRQ) LBS
~	Door #10 Filter Cake	Process Bldg Door 10	20000 lbs	Solid Filter Cake	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
~	Iron Anodes	Process Bldg and Anode Storage	420000 lbs	Iron	Steel	N/A	x	N/A	N/A	N/A	N/A	Good	N/A	N/A	440	100
~	Lead Acid Batteries	N. Motor Room and Fire Pumphouse	12000 lbs	Lead and Sulfuric Acid	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
~	Perlite	Process/Terminal Bldg./WWTP	81000 lbs	Perlite	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
~	USS PXP 9010	Chemical Bldg.	41000 lbs	USSPXP	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
~	USSP 435-254	Chemical Bldg.	12000 lbs	USSP	Plastic	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	50
~	Zinc Anodes	Process Bldg and Anode Storage	500000 lbs	Zinc	Steel	N/A	x	N/A	N/A	N/A	N/A	Good	N/A	N/A	2,200	100
~	Door #13 Zinc Hydroxide Filter Cake	WWTP Door 13	16,200	Zinc Compounds	Steel	N/A	x	No	N/A	N/A	N/A	Good	N/A	N/A	2,200	100

TABLE 2
DESCC CONTACT INFORMATION
LIST OF EMERGENCY COORDINATORS

NAME	POSITION	WORK PHONE	CELL PHONE
Steve Ford	Support Services Manager and Environmental Liaison	313-203-9836	734-752-3356
Jason Pond	Plant Manager	313-203-9810	313-587-5125
Dan Whaley	Fire/Safety Representative	313-203-9760	313-363-1927
Don Warner	Wastewater Treatment Plant Supervisor	313-203-9807	313-363-1926
Mark Hill	Operations Manager	313-203-9815	313-363-1898
Mike Suggs	Shift Supervisor	313-363-9816	313-363-1921
Kurt Hart	Shift Supervisor	313-203-9899	313-363-1892
Mike Koch	Shift Supervisor	313-203-9899	313-363-1893
Kevin Riopelle	Shift Supervisor	313-363-9899	313-363-2405
Jeff Scott	Shift Supervisor	313-203-9840	313-363-2401
Tom Branham	U.A.W. Safety Coordinator	313-203-9738	313-363-1884
Jim Grahek	Safety Representative	313-203-9886	313-693-5838
Karl Nordstrom	Maintenance Planner	313-203-9808	313-363-1914
Gabe Arroyo	Electrical Planner	313-203-9875	313-363-1853
Monte Jackson	Quality Assurance Lab Manager	313-203-9873	313-363-1903
Jonathan Smith	Quality Manager	313-203-9840	313-363-1920
Karen Maraldo	IT Supervisor	313-203-9831	313-433-4065
Mike Torina	Accountant	313-203-9820	313-363-1889
Vincent Moore	Security Supervisor - *contractor*	313-203-9885	313-468-0135
Dave Larson	Environmental Consultant - *contractor*	313-203-9829	412-377-1938
Bethany Gozdzialski	Environmental Consultant - *contractor*	313-203-9829	248-978-5371
Paul Tomiczek	Environmental Consultant - *contractor*	313-203-9829	412-216-1142
Scott Wilkie	Vac-All, Service Supervisor- *contractor*	734-941-4357	734-231-1931

FIGURE 3

Emergency Response Flow Chart



6/2/2011

APPENDIX A

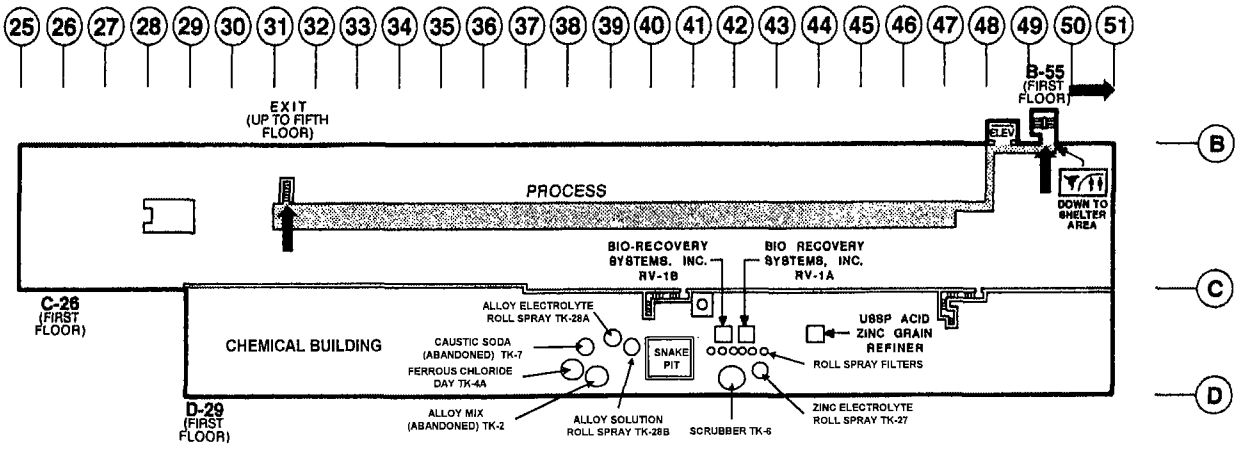
STORAGE TANK, PROCESS TANK, AND HAZARDOUS MATERIAL LOCATIONS

Double Eagle Steel Coating Company

Figure A-1

CHEMICAL BUILDING

LIQUID STORAGE / PROCESS TANKS BY LOCATION



NOTES:

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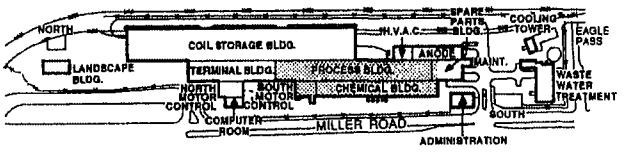
SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

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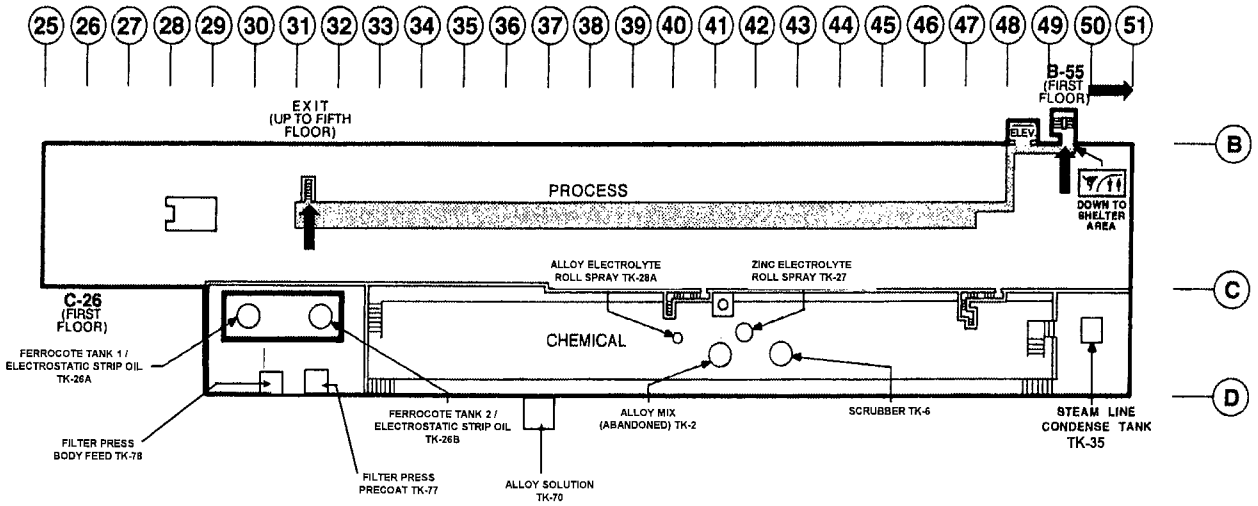
Figure A-2

Double Eagle Steel Coating Company

CHEMICAL BUILDING

LIQUID STORAGE / PROCESS TANKS BY LOCATION
(BASEMENT UNDER FLOOR & ON BASEMENT FLOOR)



NOTES:

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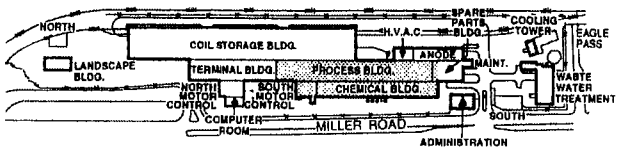
SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

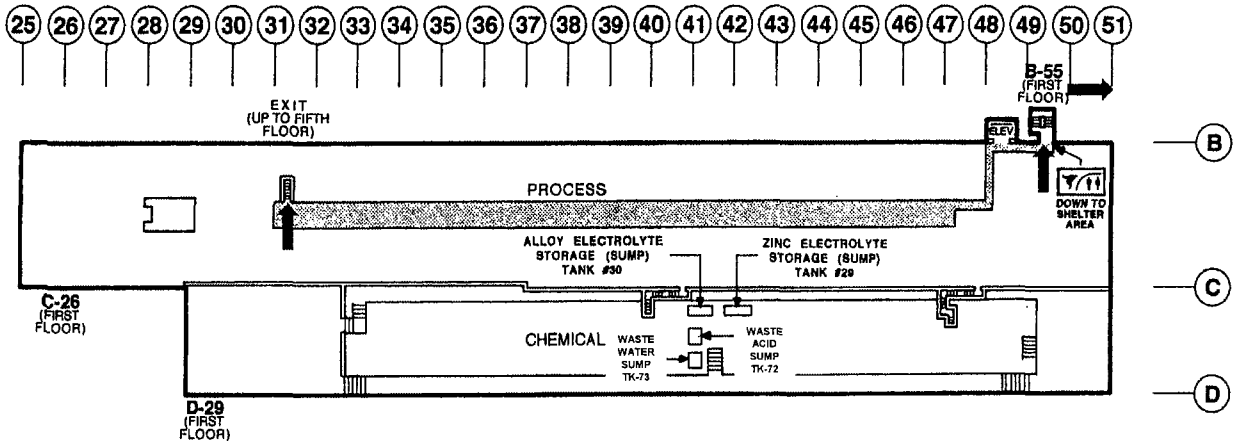
REVISED JUNE 2012

Figure A-3

Double Eagle Steel Coating Company

CHEMICAL BUILDING

LIQUID STORAGE / PROCESS TANKS BY LOCATION
(BASEMENT UNDER FLOOR / "SNAKE PIT")



NOTES:

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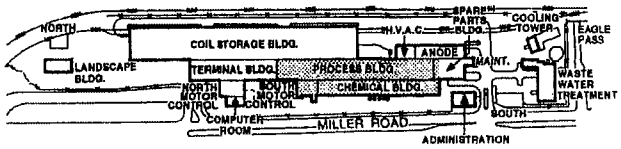
SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

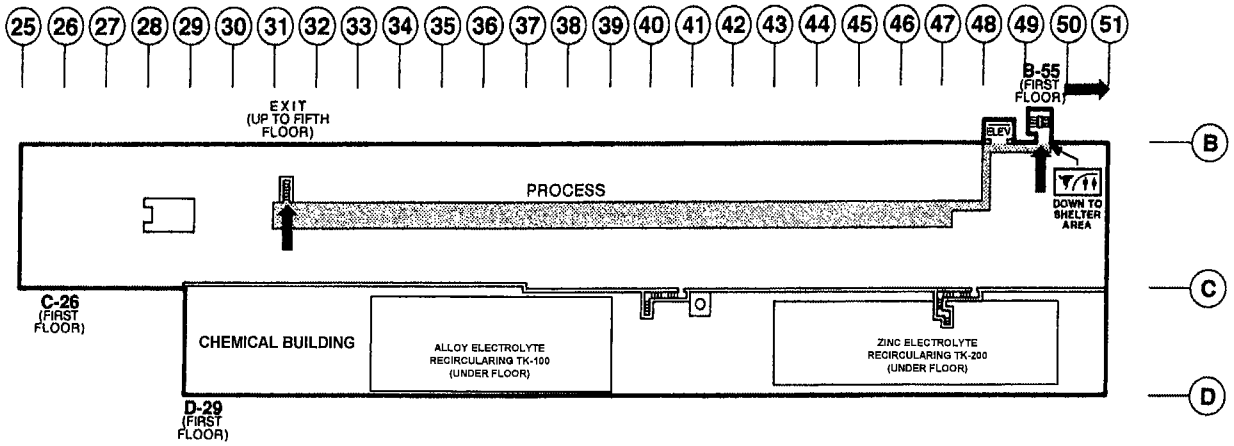
REVISED JUNE 2012

Figure A-4

Double Eagle Steel Coating Company

CHEMICAL BUILDING

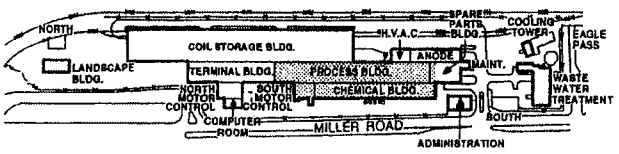
LIQUID STORAGE / PROCESS TANKS BY LOCATION
(BASEMENT UNDER FLOOR)



NOTES:

N

SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

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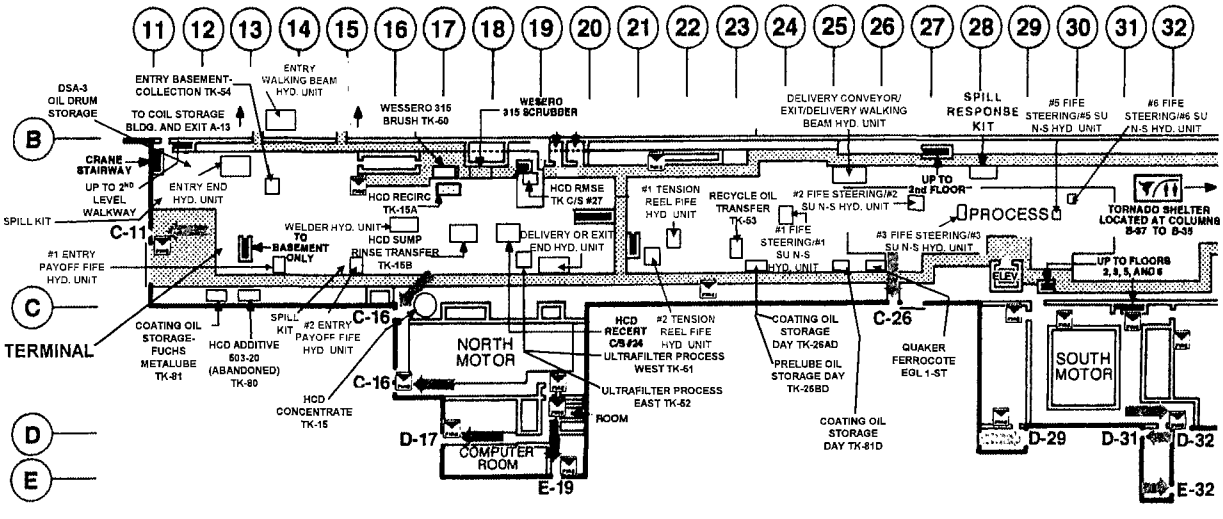
Double Eagle Steel Coating Company

Figure A-5

TERMINAL BUILDING

FIRST FLOOR - CHEMICAL STORAGE

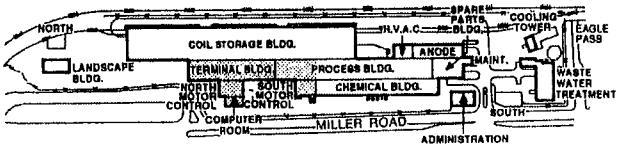


NOTES:

BLUE FONT = HYDRAULIC TANKS
BLACK FONT = ALL OTHER TANKS

N

SITE PLAN



KEY

FIRE ALARM PULL BOX

A-1etc. EXIT LOCATION

MAIN AISLE

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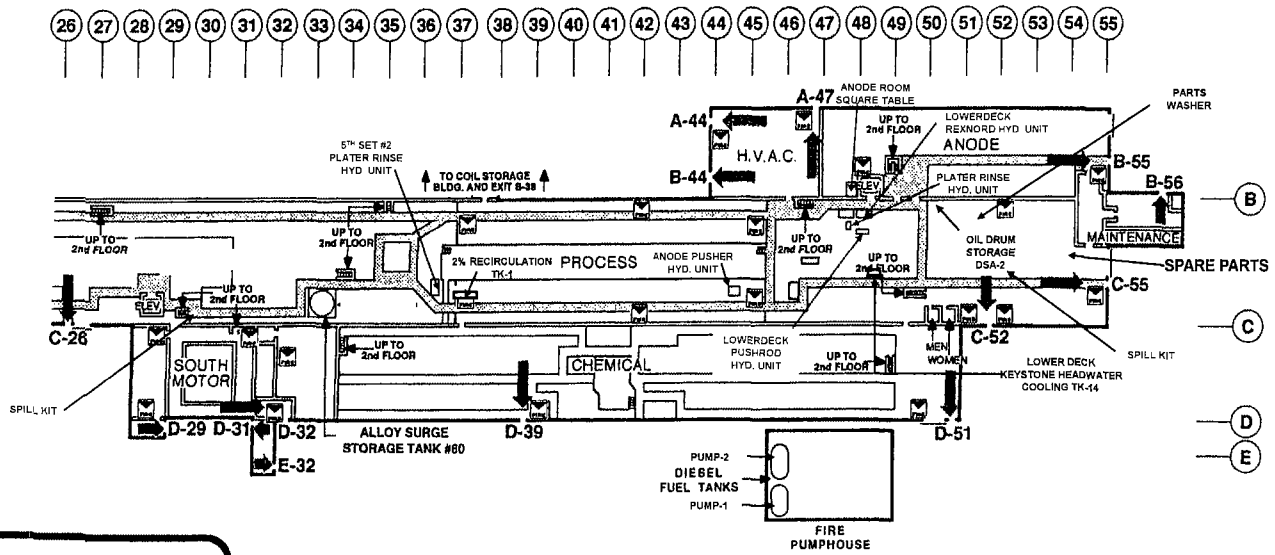
Double Eagle Steel Coating Company

Figure A-6

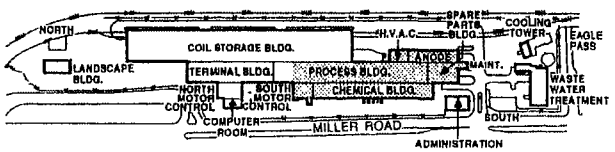
FIRST FLOOR PROCESS



NOTES:

BLUE FONT = HYDRAULIC TANKS
BLACK FONT = ALL OTHER TANKS

SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

DBE COP

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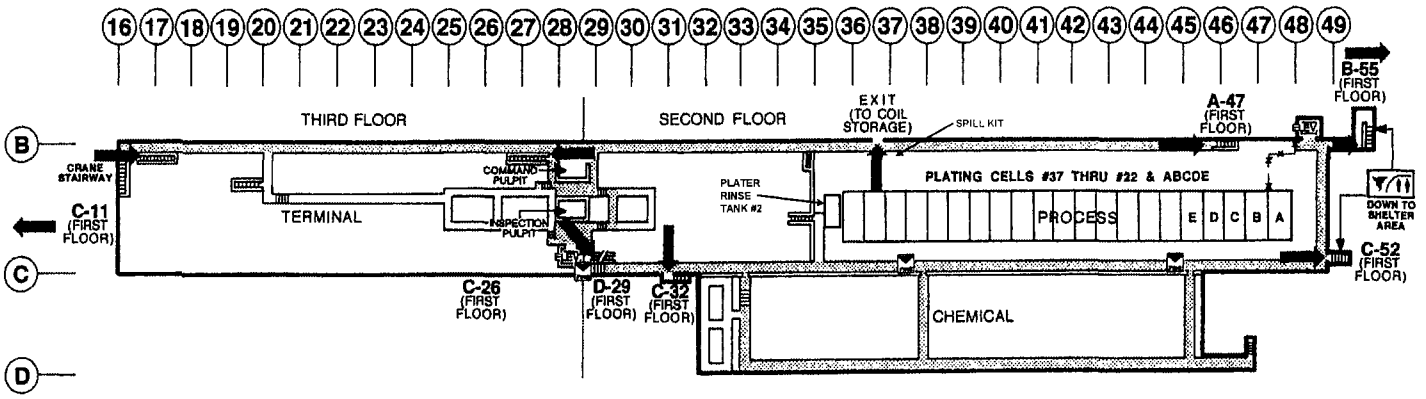
Double Eagle Steel Coating Company

Figure A-7

SECOND FLOOR PROCESS LINE

PLATER RINSE TANK #2 AND PLATER CELLS #22 THRU #37 & ABCDE



NOTES:

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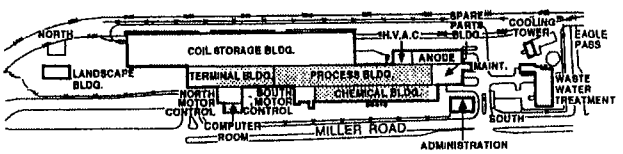
SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE

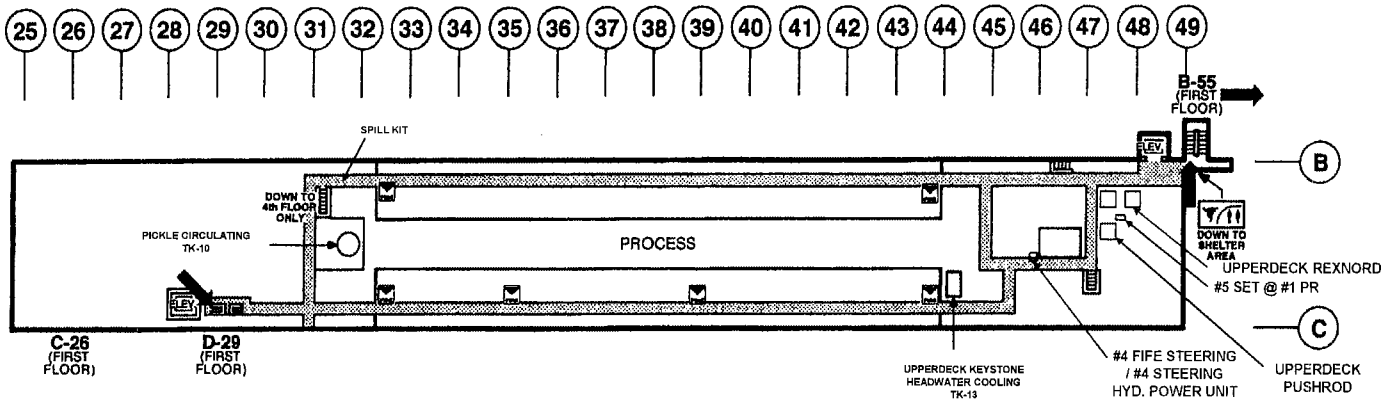
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure A-8

FIFTH FLOOR PROCESS BUILDING

PICKLE RECERT. & KEYSTONE COOLING WATER



NOTES:

BLUE FONT = HYDRAULIC TANKS
BLACK FONT = ALL OTHER TANKS

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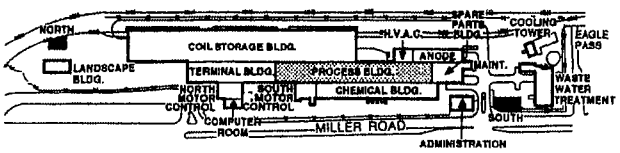
SITE PLAN



KEY

FIRE ALARM PULL BOX

A-1 etc. EXIT LOCATION

MAIN AISLE

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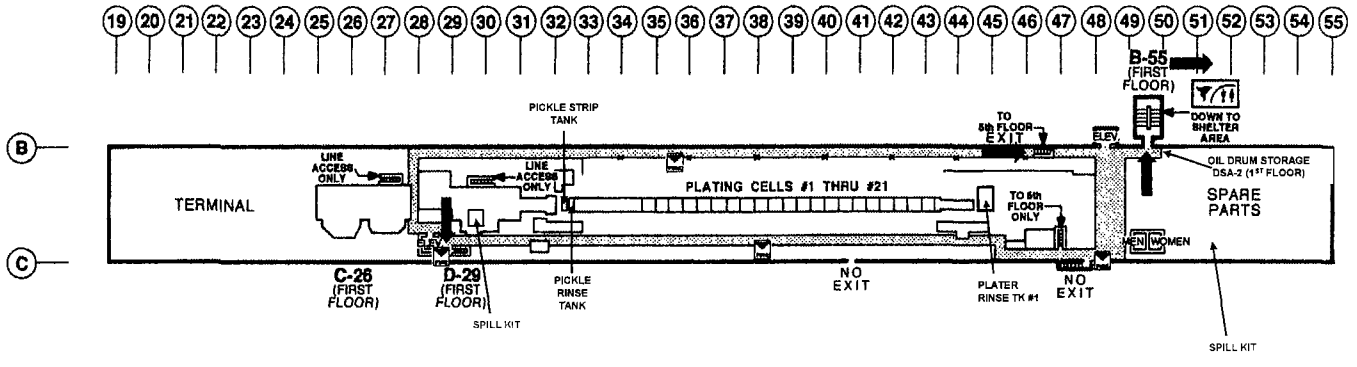
Double Eagle Steel Coating Company

Figure A-9

SIXTH FLOOR PROCESS LINE

CHEMICAL STORAGE AND PLATER CELLS (1 THRU 21)



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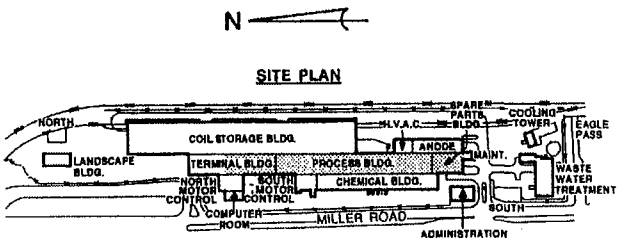

KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE

REVISED JUNE 2012

Figure A-10

Double Eagle Steel Coating Company

WASTE WATER TREATMENT

WWT TANK LOCATIONS - GROUND LEVEL

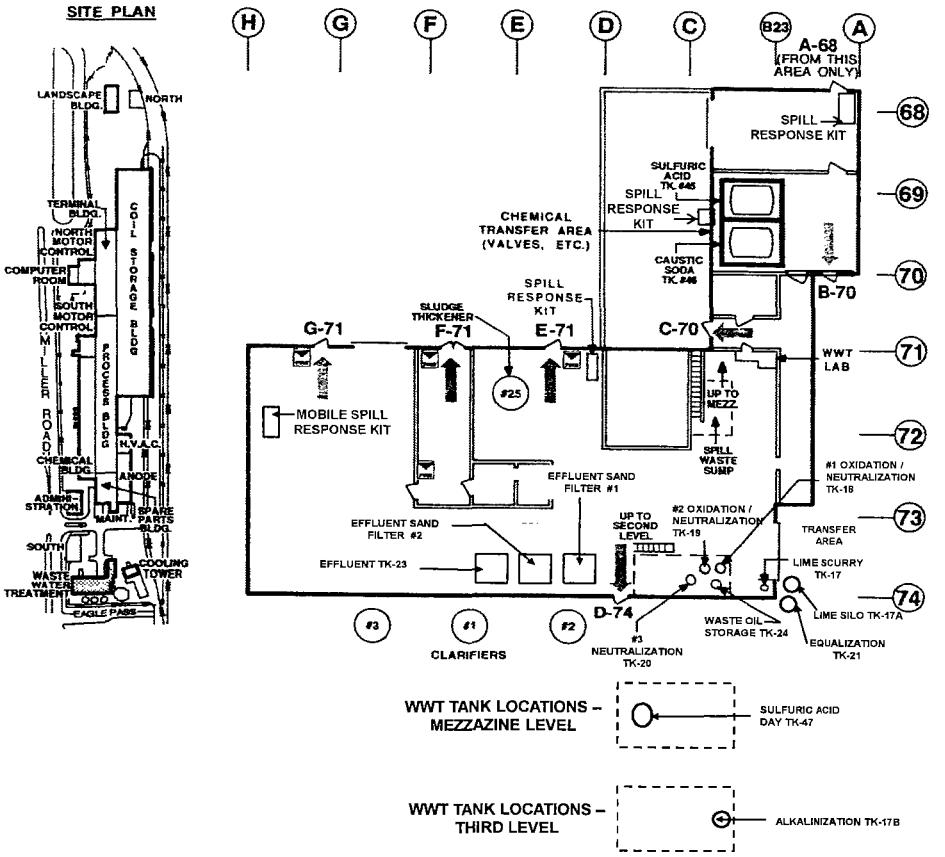

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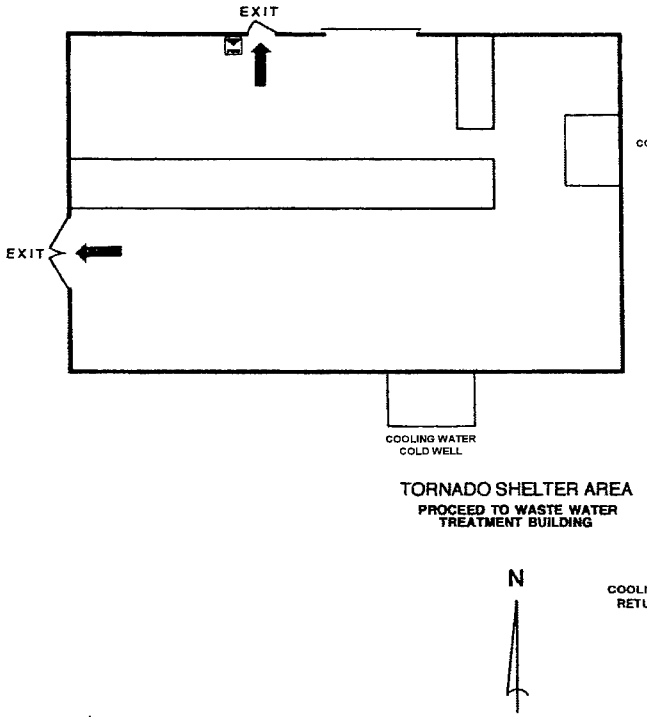
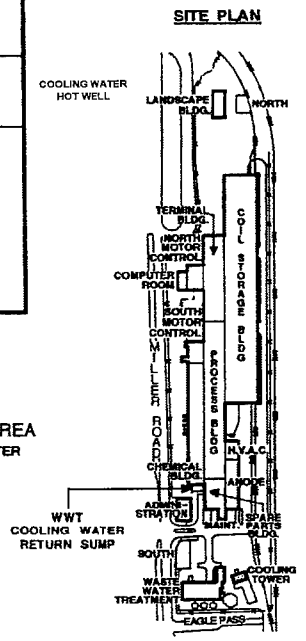
Figure A-11

Double Eagle Steel Coating Company

COOLING TOWER

WWT / COOLING TOWER TANK LOCATIONS





NOTES:

KEY

FIRE ALARM PULL BOX

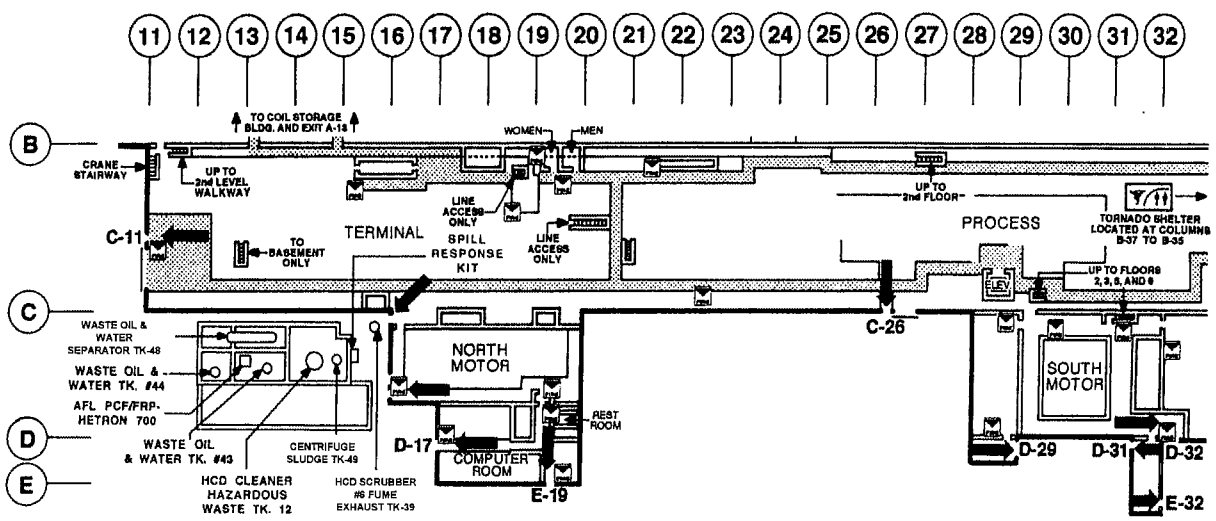
TO OUTSIDE EXIT

REVISED JUNE 2012

Figure A-12

Double Eagle Steel Coating Company

HAZARDOUS WASTE TANK FARM



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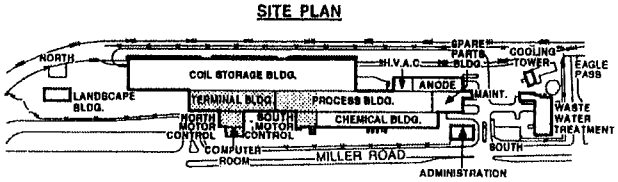
SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1 etc. EXIT LOCATION
- MAIN AISLE
- CONTAINMENT BURM

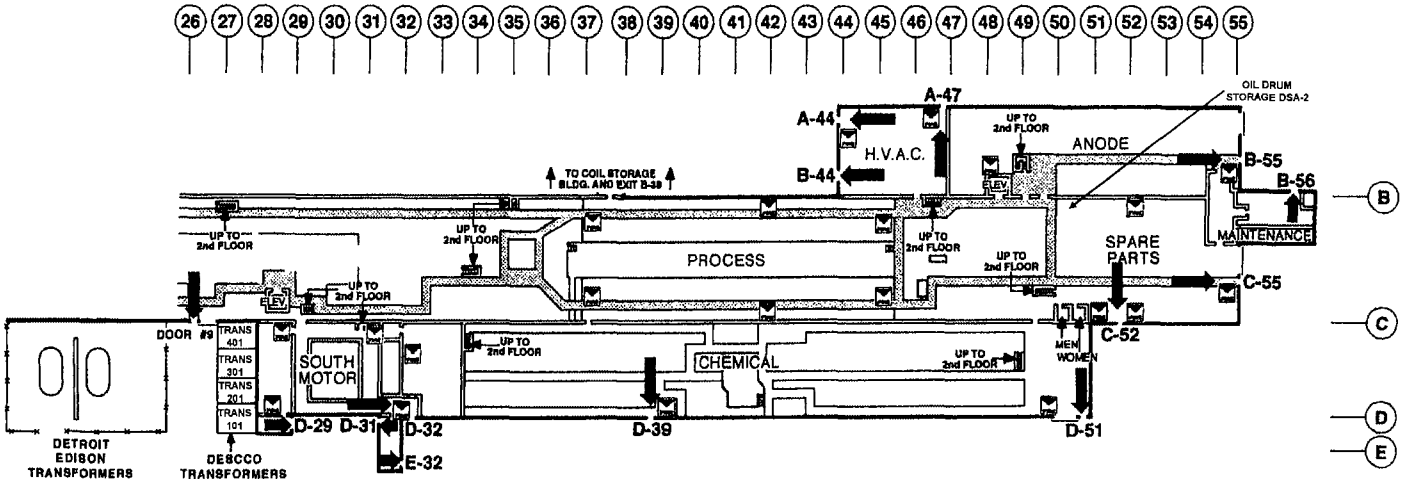
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure A-13

DETROIT EDISON

DESCCO TRANSFORMERS (MINERAL OIL)



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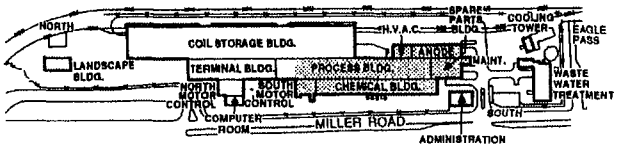
SITE PLAN



KEY

FIRE ALARM PULL BOX

A-1etc. EXIT LOCATION

MAIN AISLE

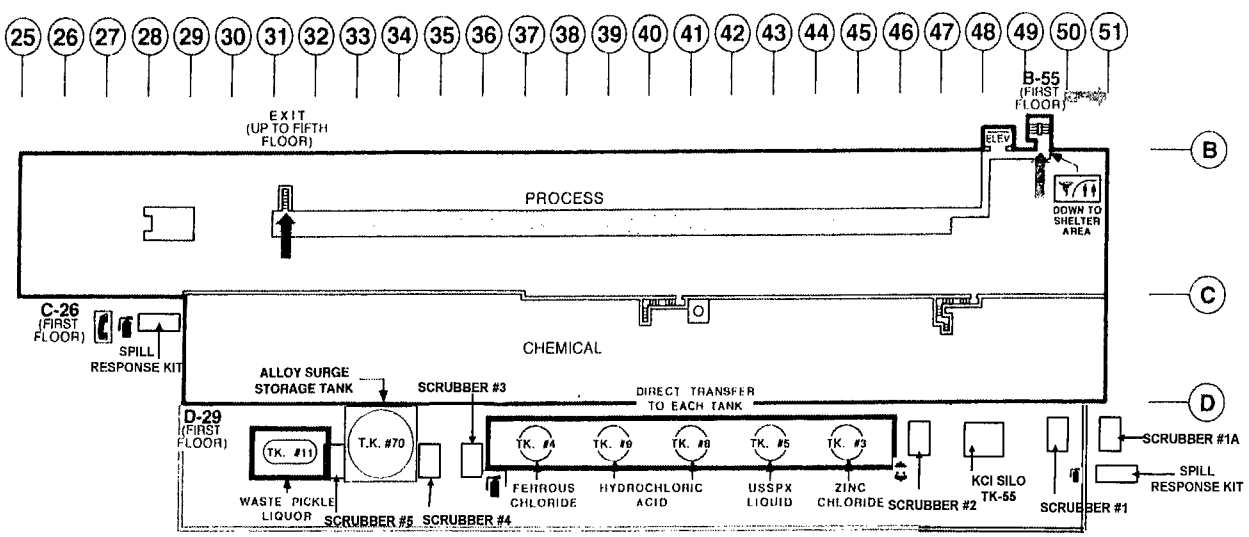
REVISED JUNE 2012

Figure A-14

Double Eagle Steel Coating Company

TANK FARM WEST OF CHEMICAL BUILDING

LIQUID STORAGE / PROCESS TANKS BY LOCATION



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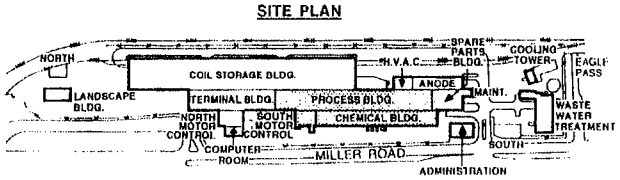
SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

CONTAINMENT BURM

FIRE EXTINGUISHER

EYE WASH / SHOWER

P.A. / PHONE LOCATION

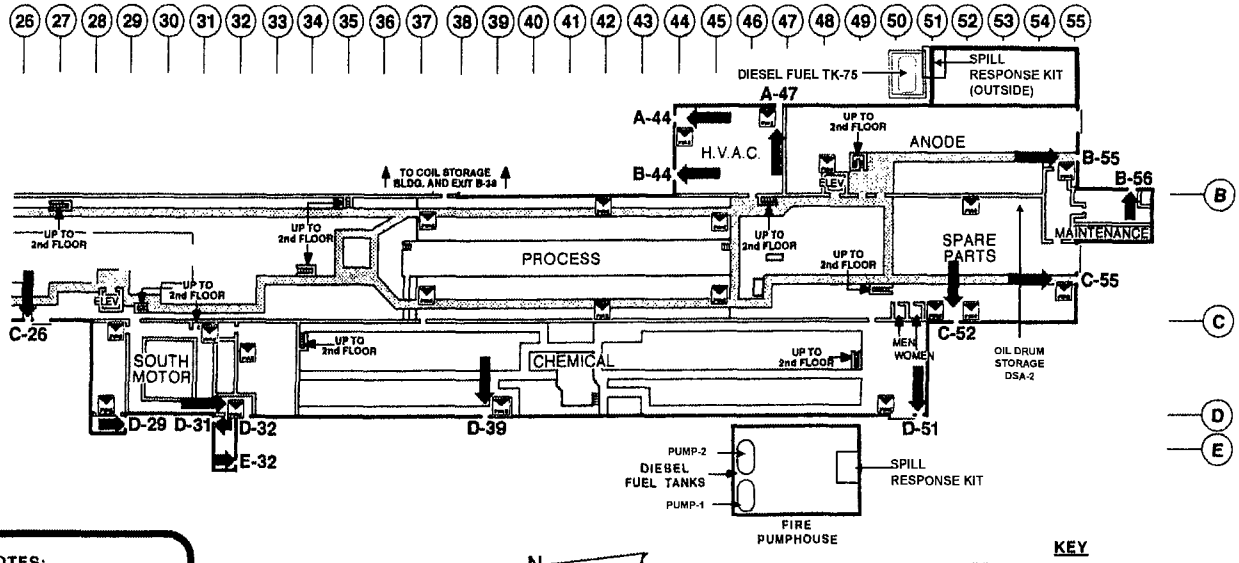
REVISED JUNE 2012

Double Eagle Steel Coating Company

LIQUID STORAGE TANK LOCATION

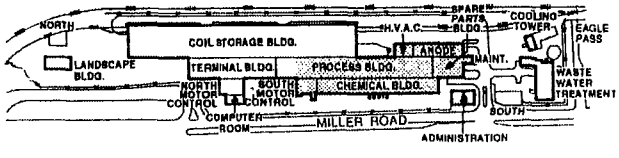
(DIESEL FUEL)

Figure A-15



NOTES:

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- CONTAINMENT BURM

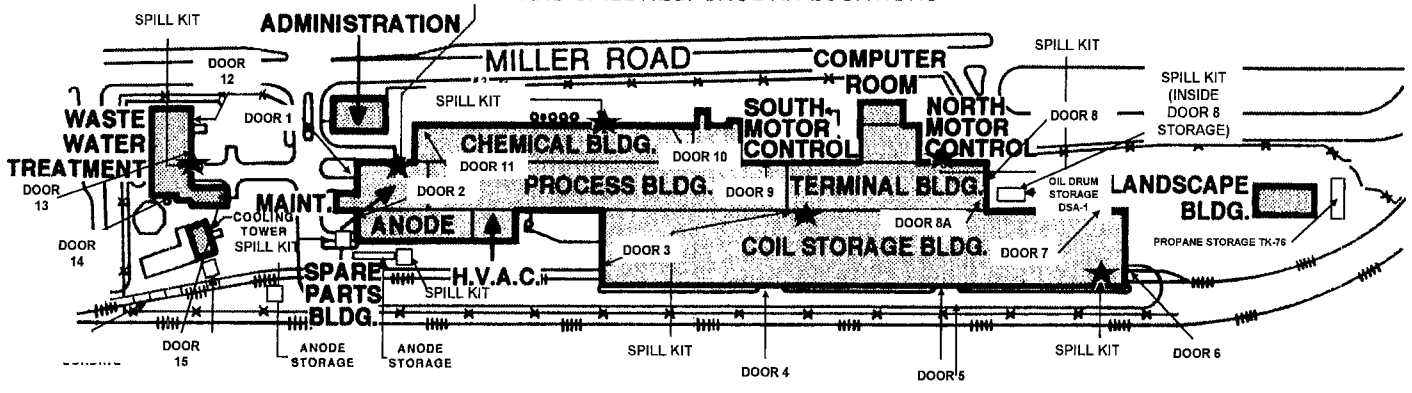
REVISED JUNE 2012

Figure A-16

Double Eagle Steel Coating Company

Dearborn, Michigan

OUTSIDE STORAGE OF MATERIALS
(INCLUDING HAZARDOUS MATERIALS)
AND SPILL RESPONSE KIT LOCATIONS



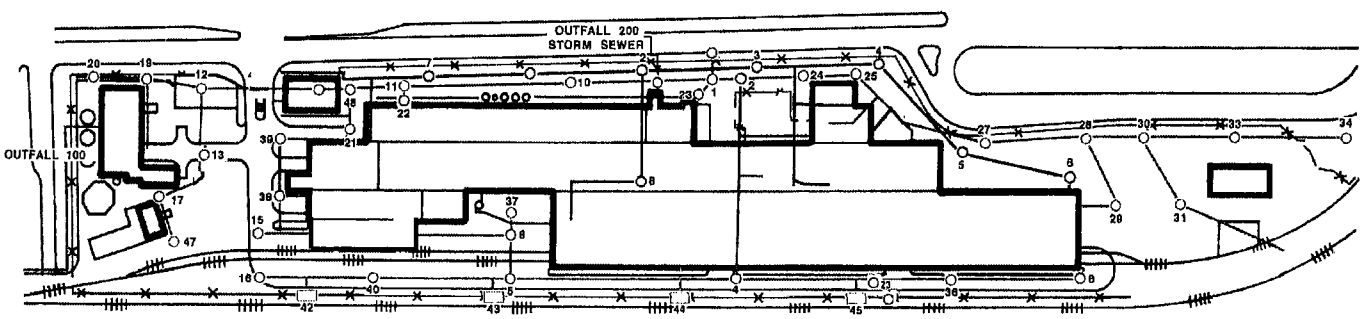
REVISED JUNE 2012

Figure B-1

Double Eagle Steel Coating Company

Dearborn, Michigan

CATCH BASINS AND MANHOLES



KEY

CATCH BASIN

SANITARY MANHOLE

STORM SEWER MANHOLE

N

DBE550 1-800-854-FIRE(3473)

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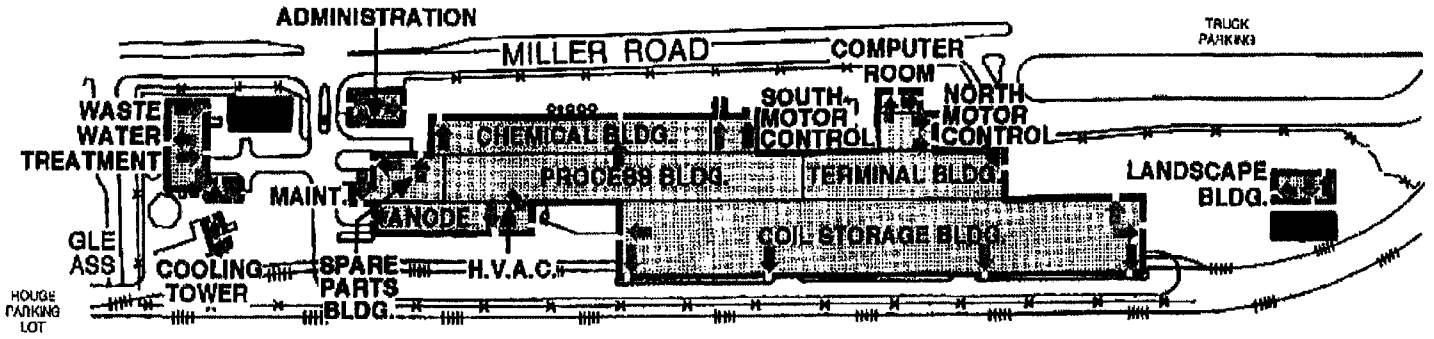
Double Eagle Steel Coating Company

Dearborn, Michigan

EVACUATION EGRESS DOOR LOCATIONS & EVACUATION ASSEMBLY LOCATIONS



KEY

TO EVACUATION EGRESS DOOR LOCATION

EVACUATION ASSEMBLY LOCATION

N

DBES50 1-800-854 FIRE(3473)

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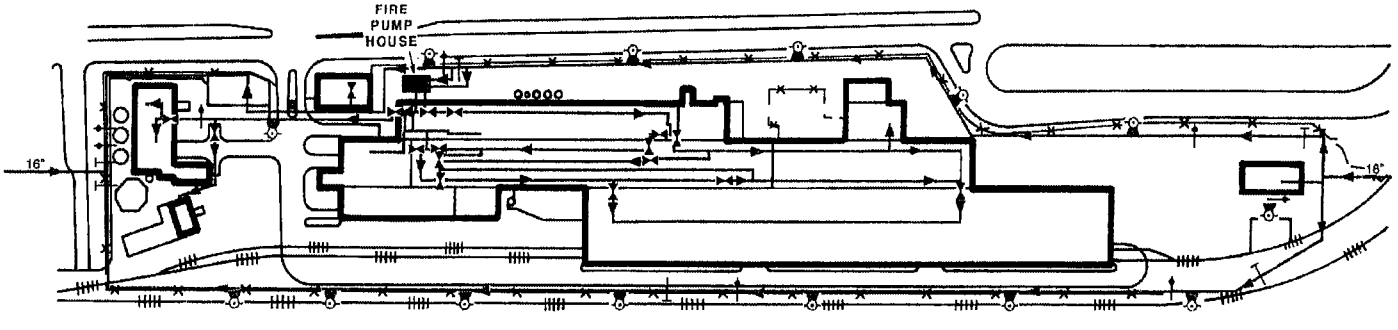
Figure D-1

Double Eagle Steel Coating Company

Dearborn, Michigan

FIRE LOOP



KEY

- FIRE LOOP
- FIRE HYDRANT
- POST INDICATOR VALVE
- SECTIONAL CONTROL VALVE
- OS & Y VALVE

N

DBE550 1-800-654-FIRE(3473)

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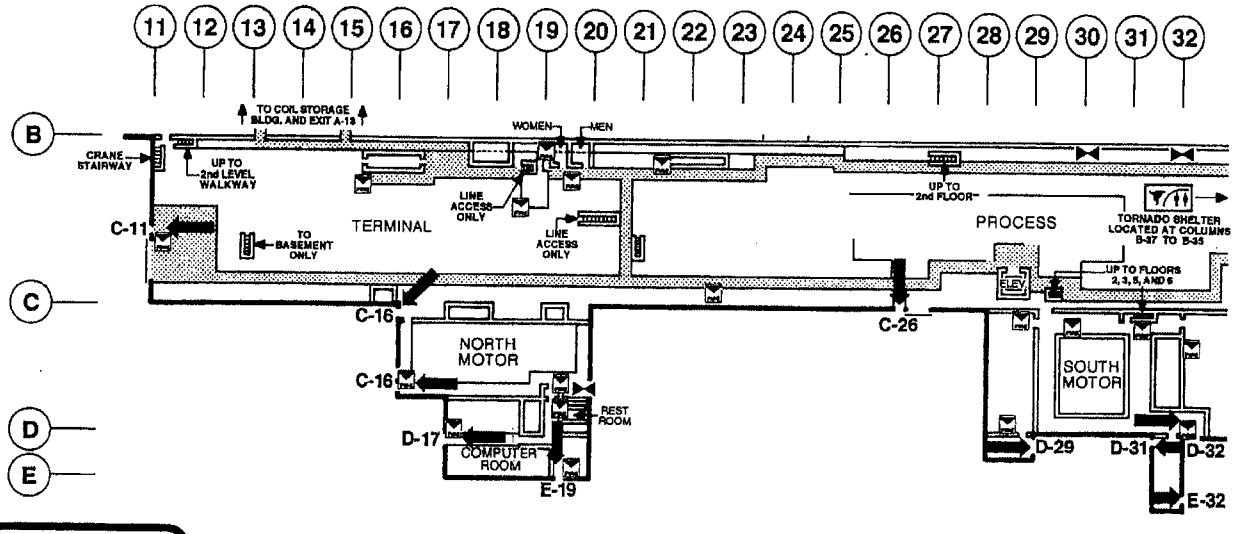
Figure D-2

Double Eagle Steel Coating Company

FIRST FLOOR - NORTH SECTION

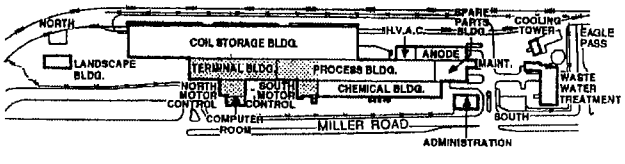
OS & Y VALVES



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- OS & Y VALVES

DBE550 1-800-854-FIRE(3473)

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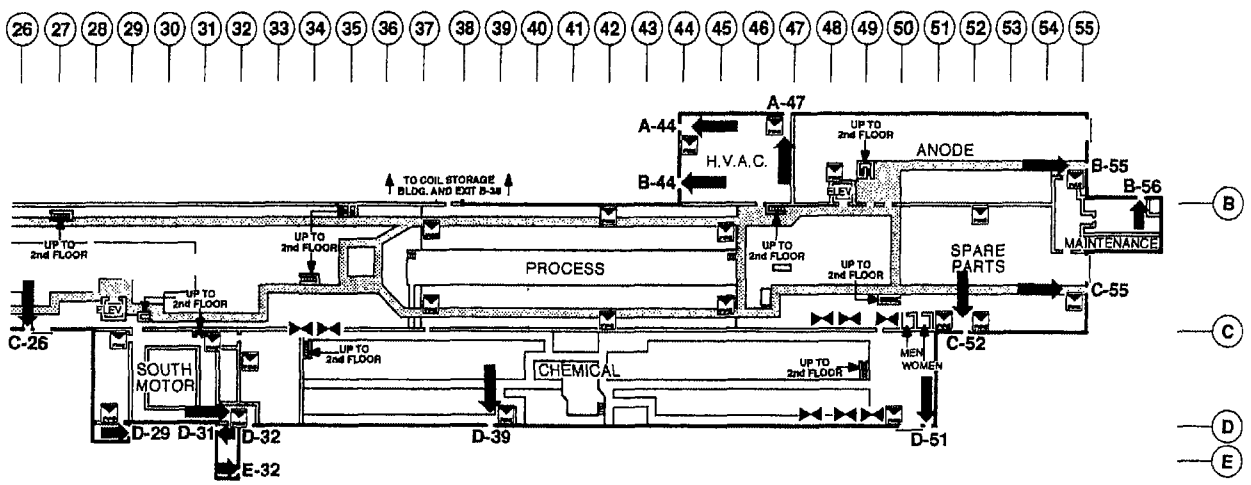
Double Eagle Steel Coating Company

Figure D-3

FIRST FLOOR - SOUTH SECTION

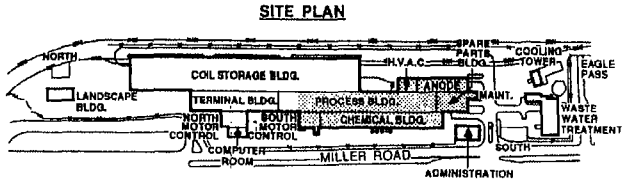
OS & Y VALVES



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- OS & Y VALVES

DBE550 1-800-854-FIRE(3473)

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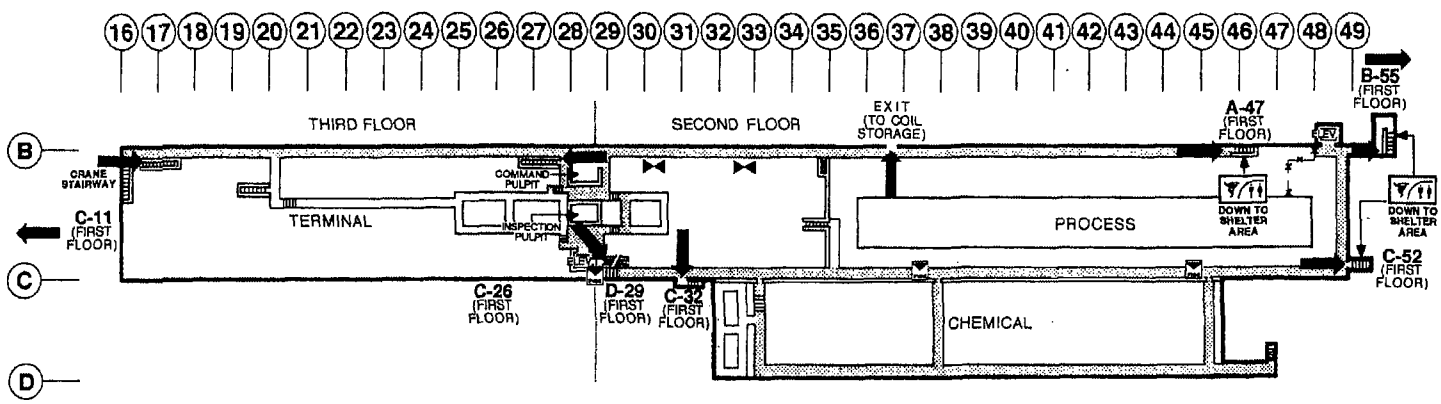
Double Eagle Steel Coating Company

Figure D-4

SECOND AND THIRD FLOOR

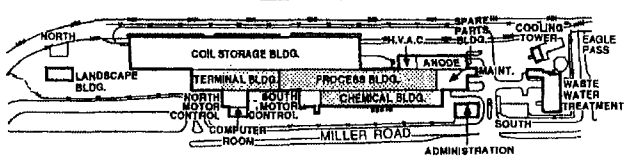
OS & Y VALVES



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- OS & Y VALVES

DBE550 1-800-854-FIRE(3473)

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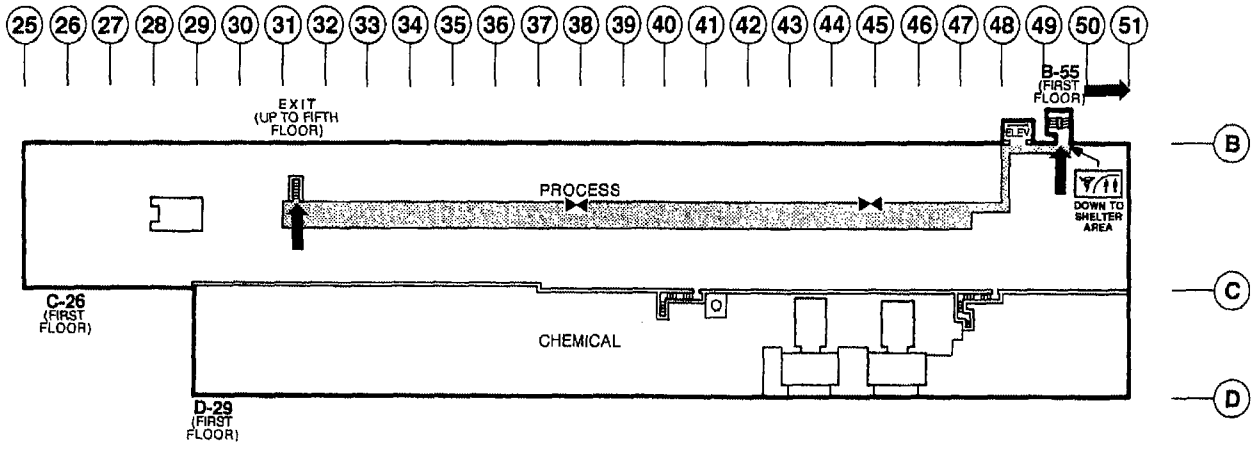
Double Eagle Steel Coating Company

Figure D-5

FOURTH FLOOR

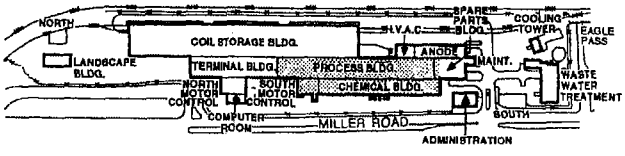
OS & Y VALVES



NOTES:

N

SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

OS & Y VALVES

DBE550 1-800-854-FIRE(3473)

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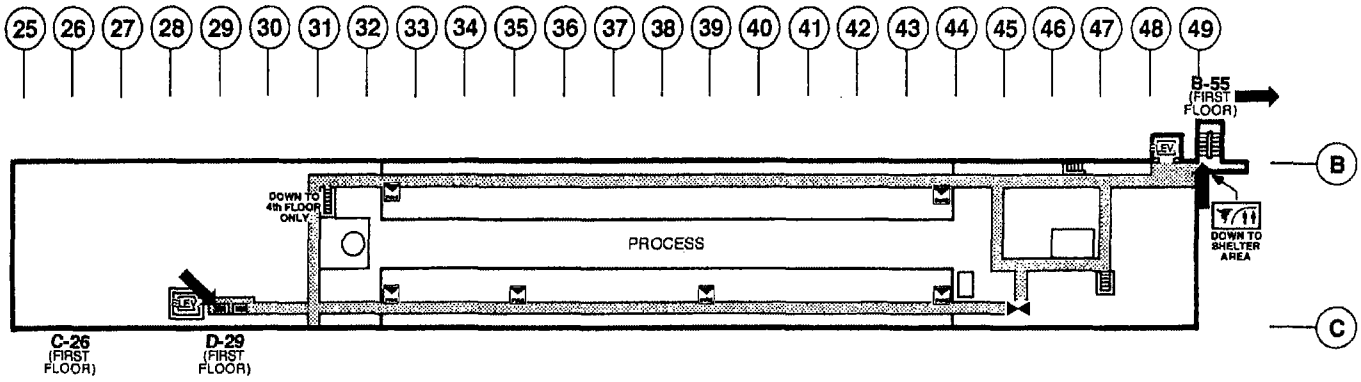
Double Eagle Steel Coating Company

Figure D-6

FIFTH FLOOR

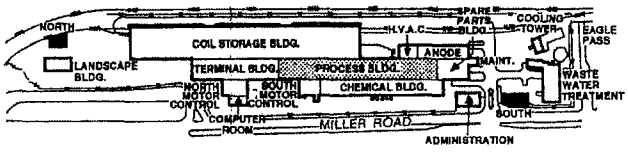
OS & Y VALVES



NOTES:

N

SITE PLAN



KEY

FIRE ALARM PULL BOX

A-1etc. EXIT LOCATION

MAIN AISLE

OS & Y VALVES

DBE550 1-800-854-FIRE(3473)

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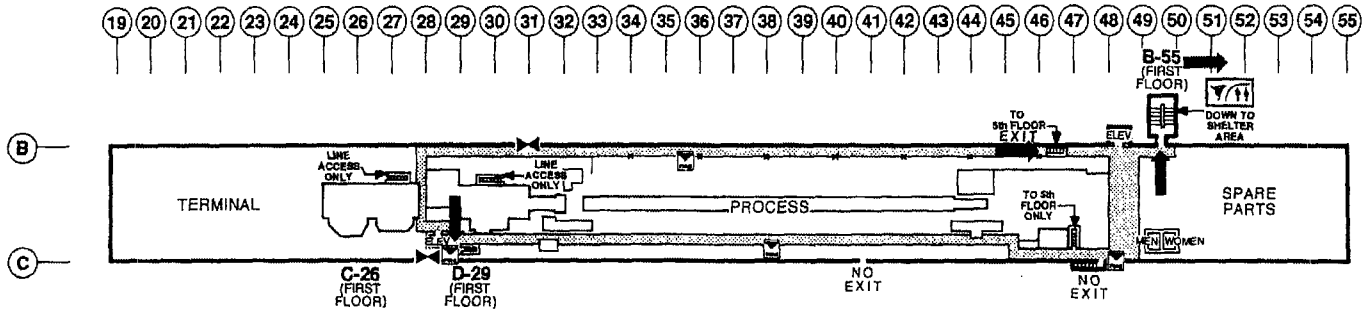
Figure D-7

Double Eagle Steel Coating Company

SIXTH FLOOR

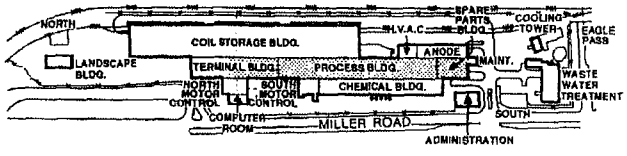
OS & Y VALVES



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- OS & Y VALVES

DBE350 1-800-854-FIRE(3473)

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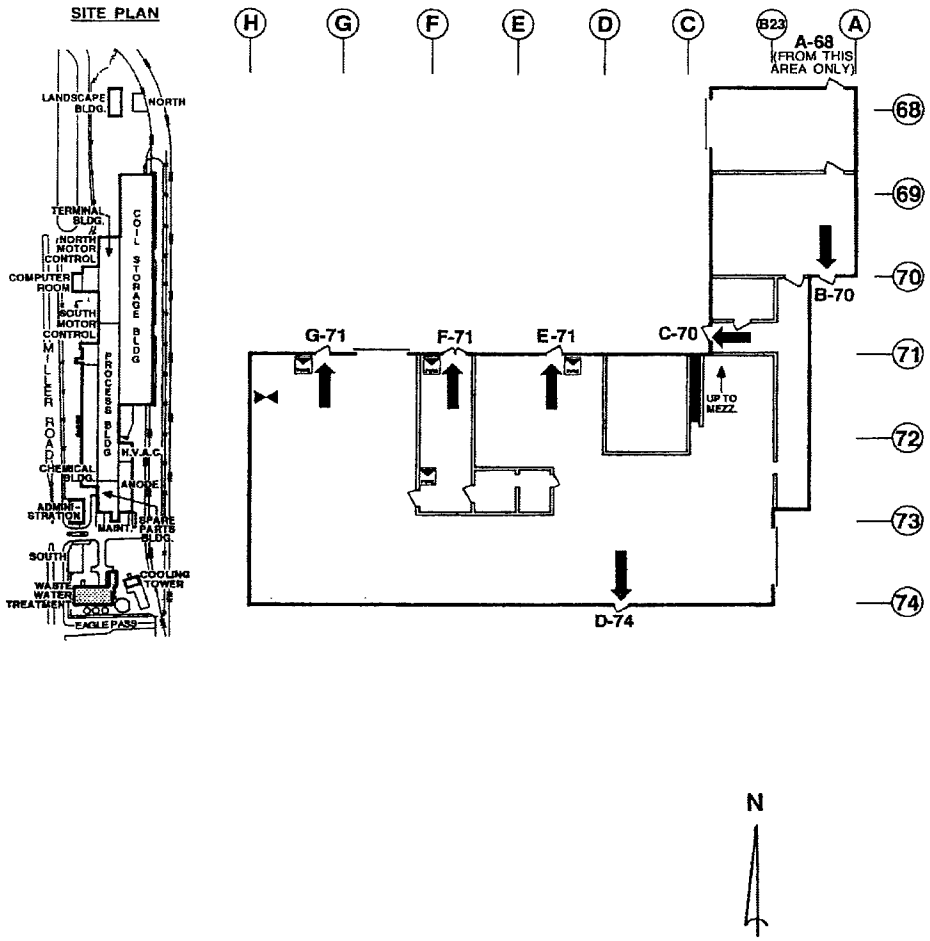
Figure D-8

Double Eagle Steel Coating Company

WASTE WATER TREATMENT

OS & Y VALVES



NOTES:

KEY

FIRE ALARM PULL BOX

A-1etc. EXIT LOCATION

OS & Y VALVES

DBE560 1-800-854-FIRE(3473)

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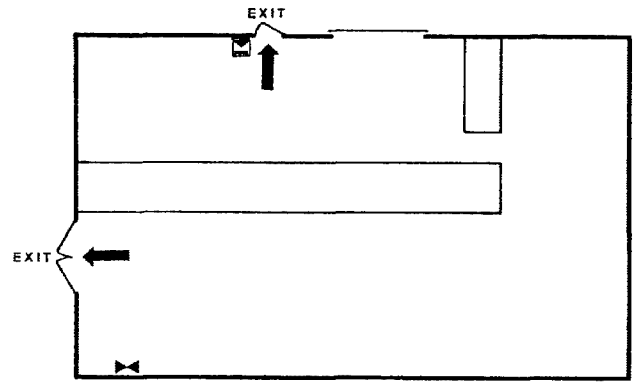
Figure D-9

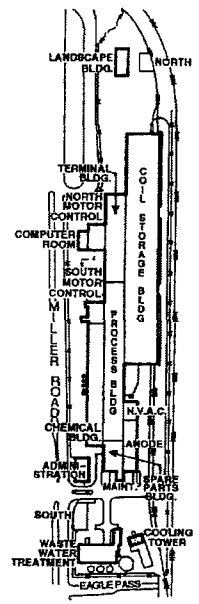
Double Eagle Steel Coating Company

COOLING TOWER

OS & Y VALVES



SITE PLAN



N

NOTES:

KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- OS & Y VALVES

DBE650 1-800-854-FIRE(3473)

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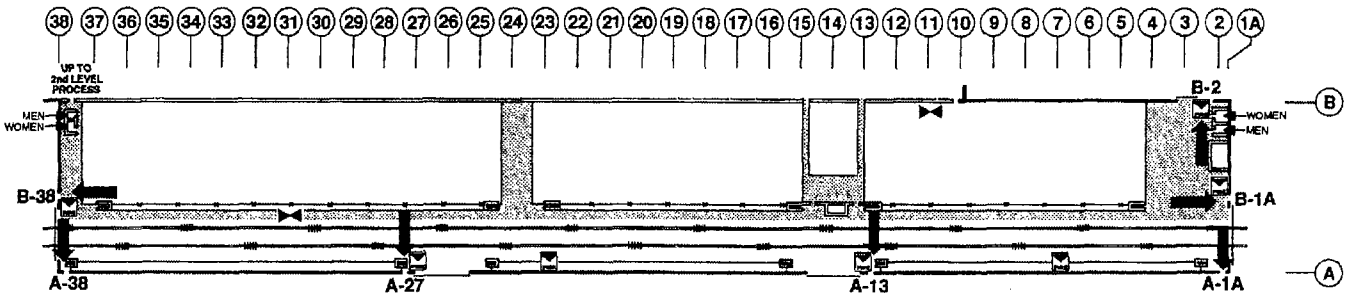
Double Eagle Steel Coating Company

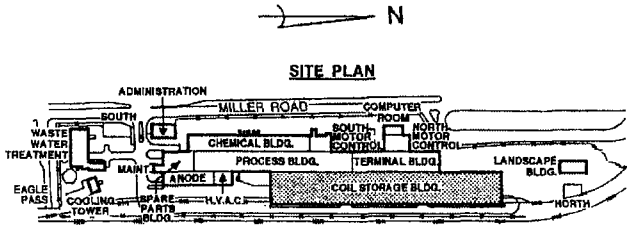
Figure D-10

COIL STORAGE

OS & Y VALVES



NOTES:



KEY

- FIRE ALARM PULL BOX
- A-1 etc. EXIT LOCATION
- MAIN AISLE
- OS & Y VALVES

DBE550 1-800-854-FIRE(3473)

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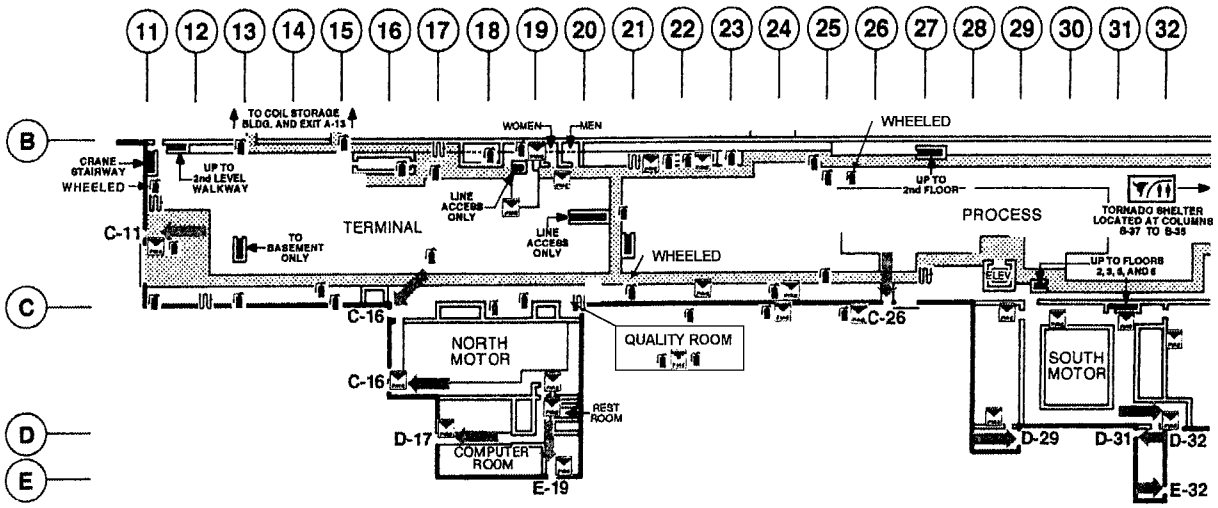
Double Eagle Steel Coating Company

Figure E-1

TERMINAL BUILDING

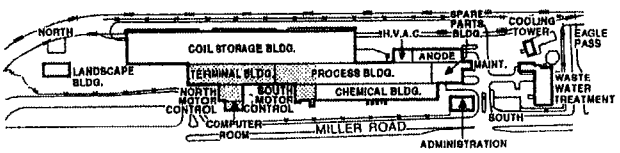
FIRST FLOOR - FIRE PROTECTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- FIRE HOSE

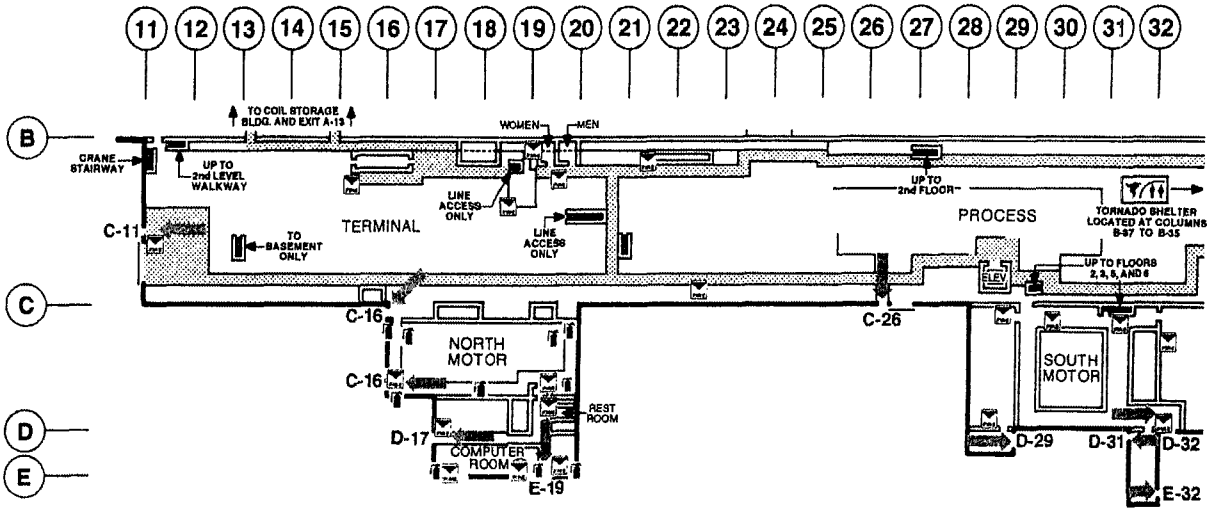
REVISED JUNE 2012

Figure E-2

Double Eagle Steel Coating Company

NORTH MOTOR ROOM & COMPUTER ROOM

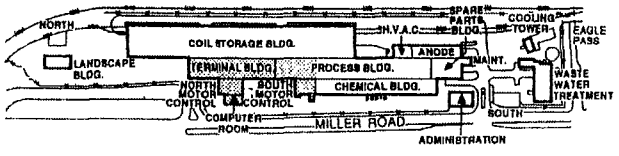
FIRST FLOOR - FIRE PROTECTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1 etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- SMOKE DETECTOR

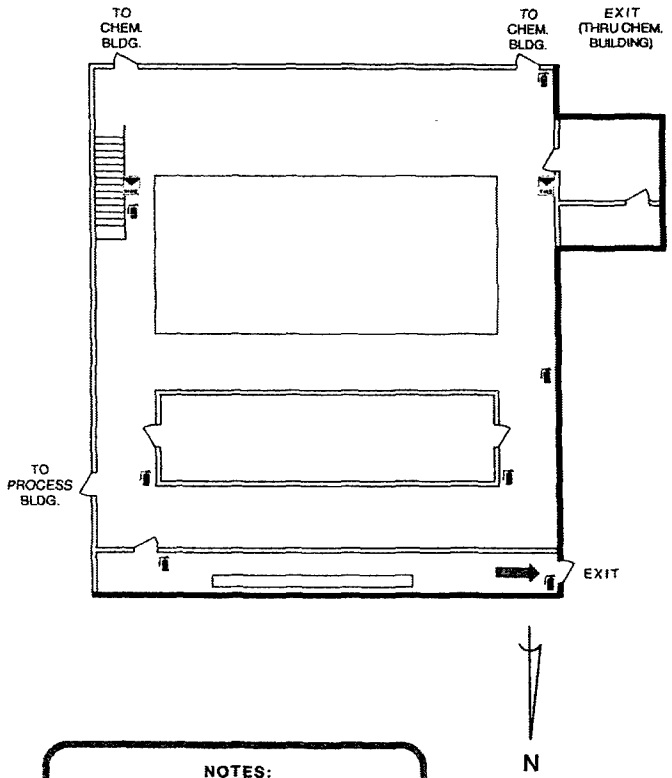
REVISED JUNE 2012

Figure E-3

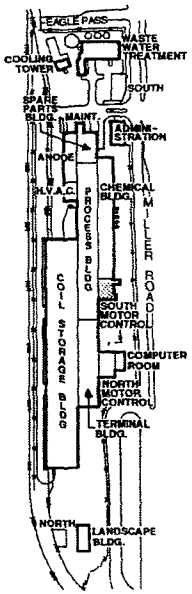
Double Eagle Steel Coating Company

SOUTH MOTOR ROOM - FIRST FLOOR

FIRE PROTECTION



SITE PLAN



NOTES:

KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- FIRE EXTINGUISHER
- SMOKE DETECTOR

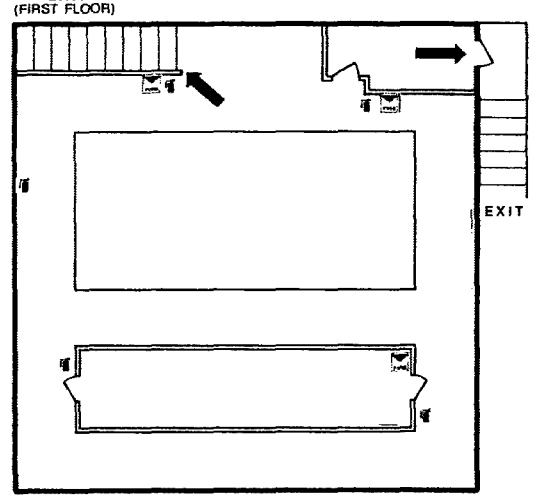
REVISED JUNE 2012

Figure E-4

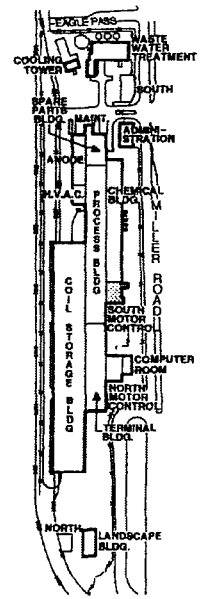
Double Eagle Steel Coating Company

SOUTH MOTOR ROOM - SECOND FLOOR

FIRE PROTECTION



SITE PLAN



N

NOTES:

KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- FIRE EXTINGUISHER
- SMOKE DETECTOR

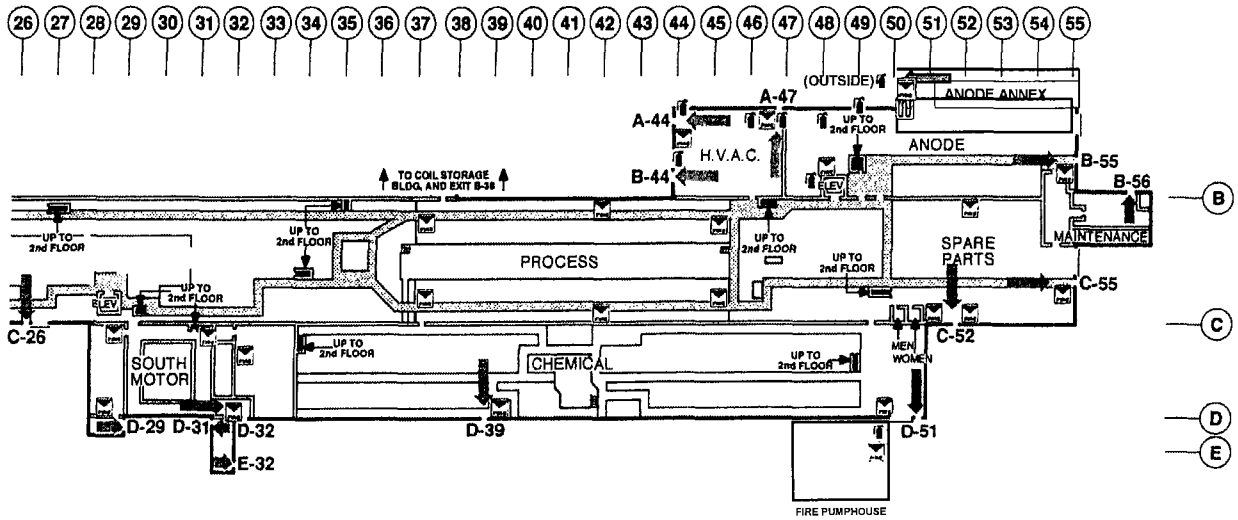
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure E-5

H.V.A.C. & ANODE BUILDINGS

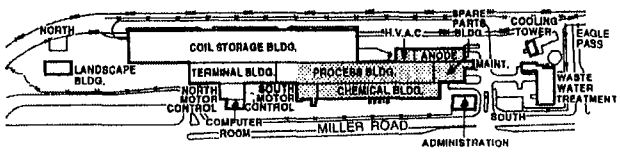
FIRST FLOOR - FIRE PROTECTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- FIRE HOSE

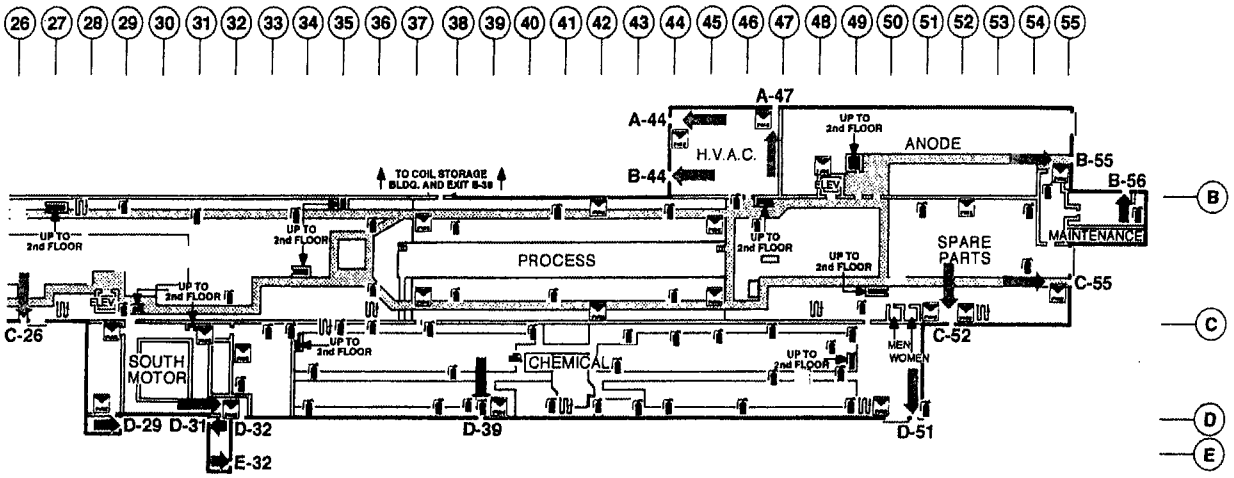
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure E-6

PROCESS & CHEMICAL BUILDINGS

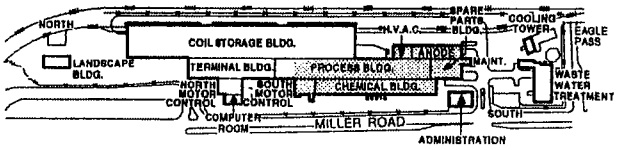
FIRST FLOOR - FIRE PROTECTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- FIRE HOSE

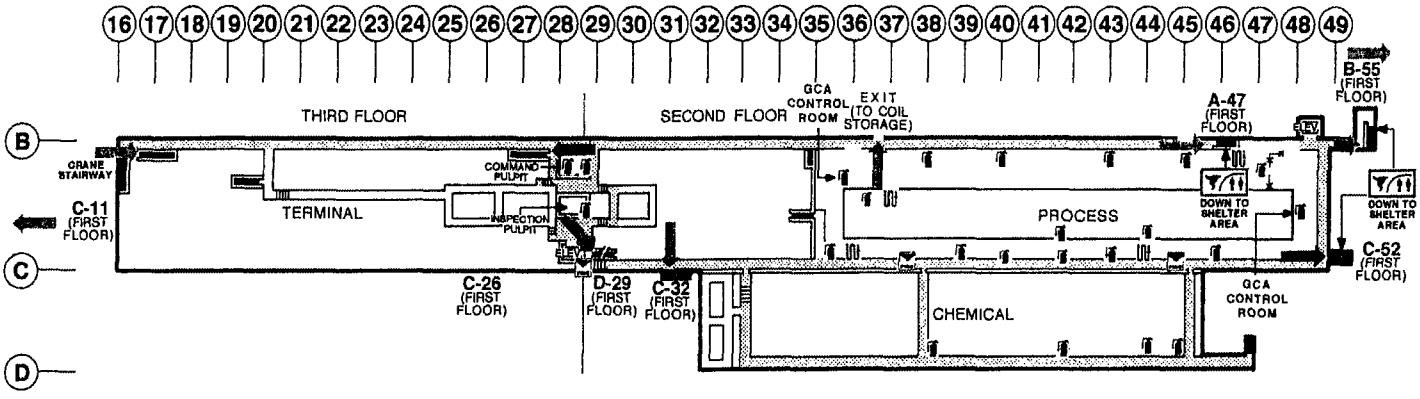
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure E-7

PROCESS & CHEMICAL BUILDINGS

SECOND & THIRD FLOOR - FIRE PROTECTION

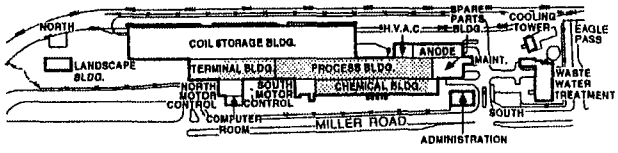


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- FIRE HOSE

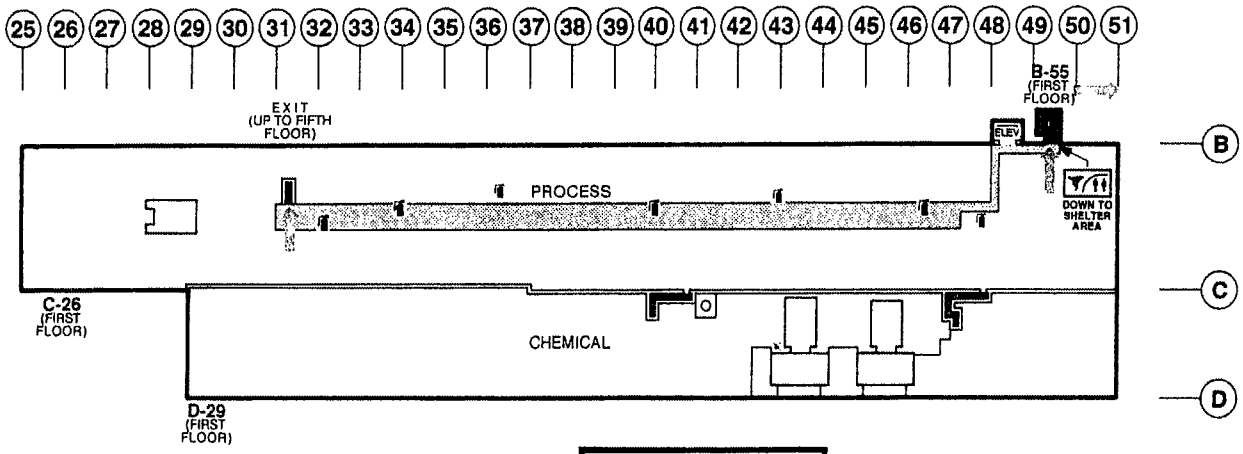
REVISED JUNE 2012

Figure E-8

Double Eagle Steel Coating Company

PROCESS & CHEMICAL BUILDINGS

FOURTH FLOOR - FIRE PROTECTION

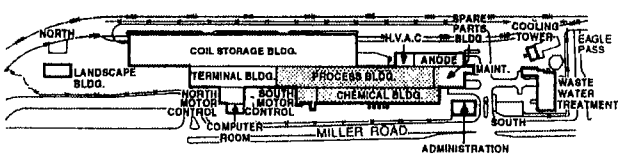


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

A-1etc. EXIT LOCATION

MAIN AISLE

FIRE EXTINGUISHER

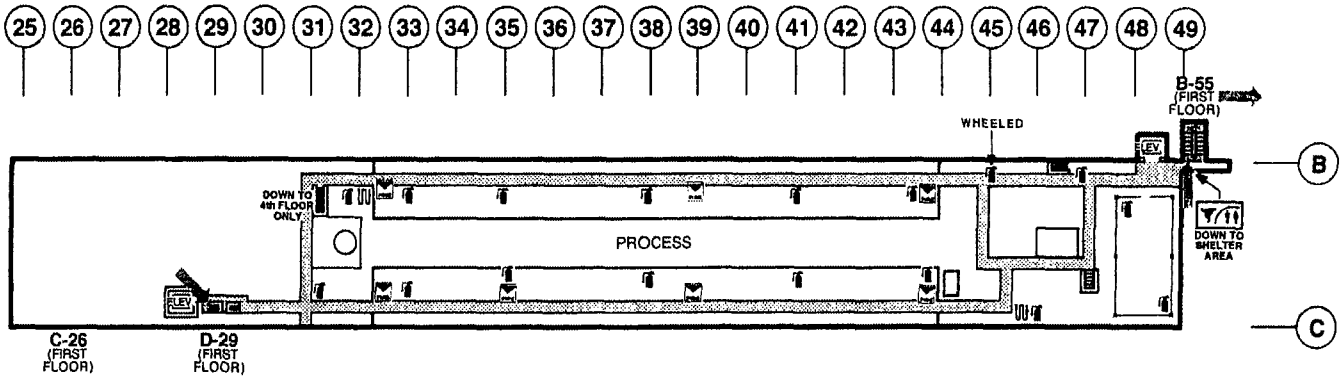
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure E-9

PROCESS BUILDING

FIFTH FLOOR - FIRE PROTECTION

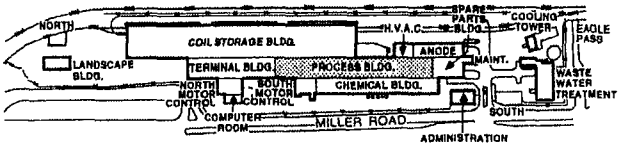


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- FIRE HOSE

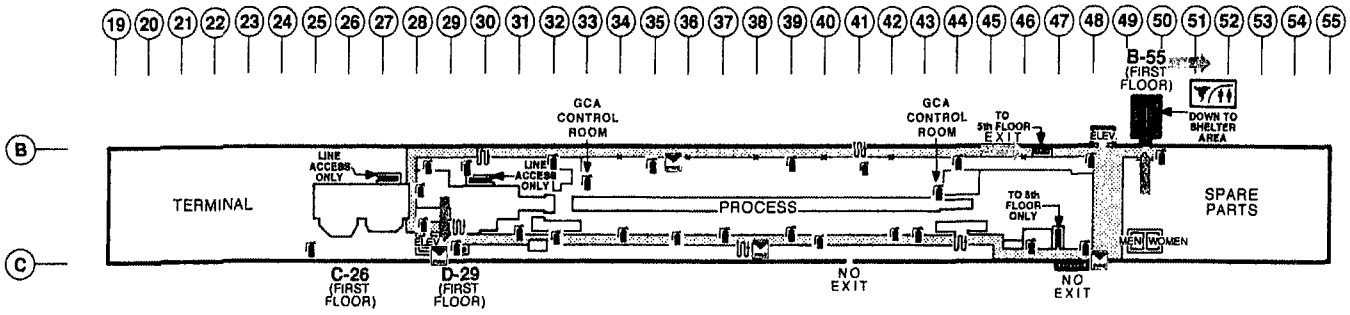
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure E-10

PROCESS BUILDING

SIXTH FLOOR - FIRE PROTECTION

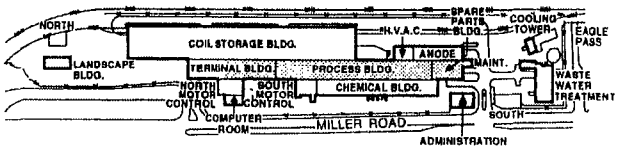


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- FIRE HOSE

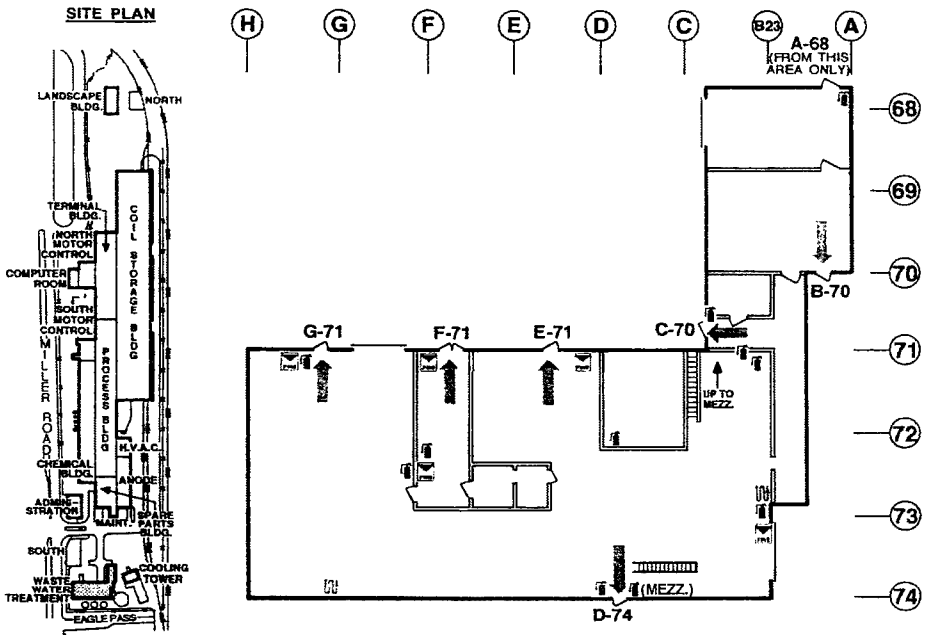
REVISED JUNE 2012

Figure E-11

Double Eagle Steel Coating Company

WASTE WATER TREATMENT

FIRE PROTECTION



N

NOTES:

KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- FIRE EXTINGUISHER
- FIRE HOSE

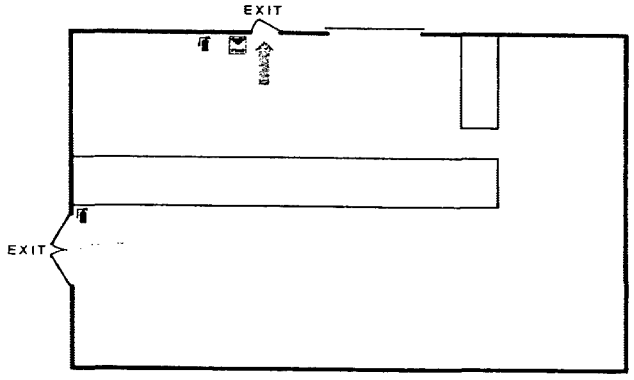
REVISED JUNE 2012

Figure E-12

Double Eagle Steel Coating Company

COOLING TOWER

FIRE PROTECTION

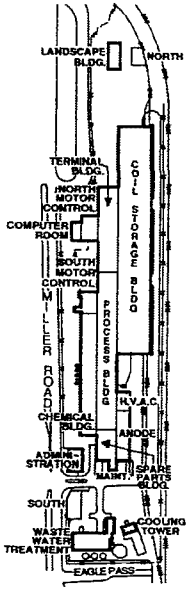


TORNADO SHELTER AREA

PROCEED TO WASTE WATER TREATMENT BUILDING

N

SITE PLAN



NOTES:

KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- FIRE EXTINGUISHER

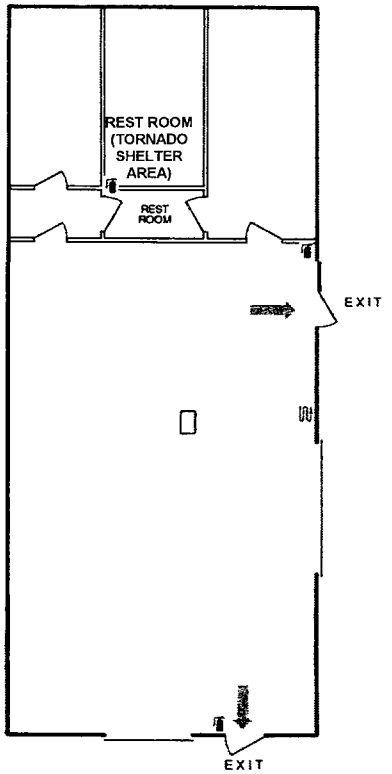
REVISED JUNE 2012

Figure E-13

Double Eagle Steel Coating Company

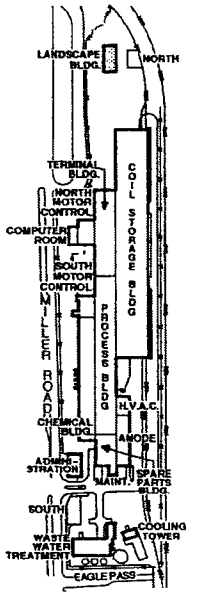
LANDSCAPE BUILDING

FIRE PROTECTION



NOTES:

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE E X I T
- FIRE EXTINGUISHER
- FIRE HOSE

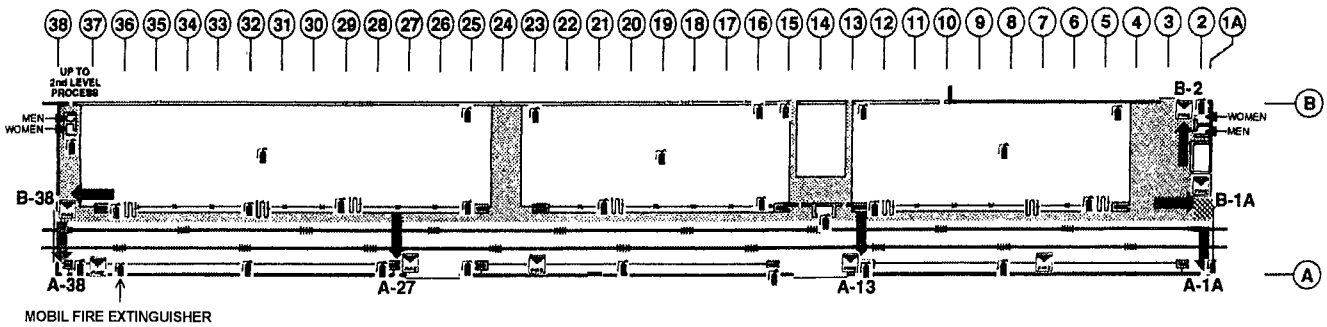
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure E-14

COIL STORAGE

FIRE PROTECTION



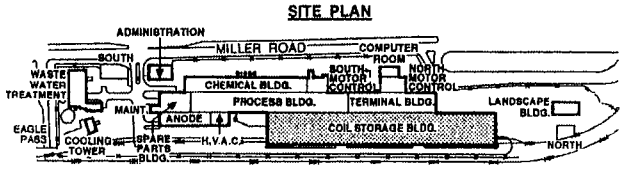
TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-49 TO 46 AND C-49 TO 46

NOTES:

CEC did not verify items located within the fenced coil storage area.

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- FIRE EXTINGUISHER
- FIRE HOSE

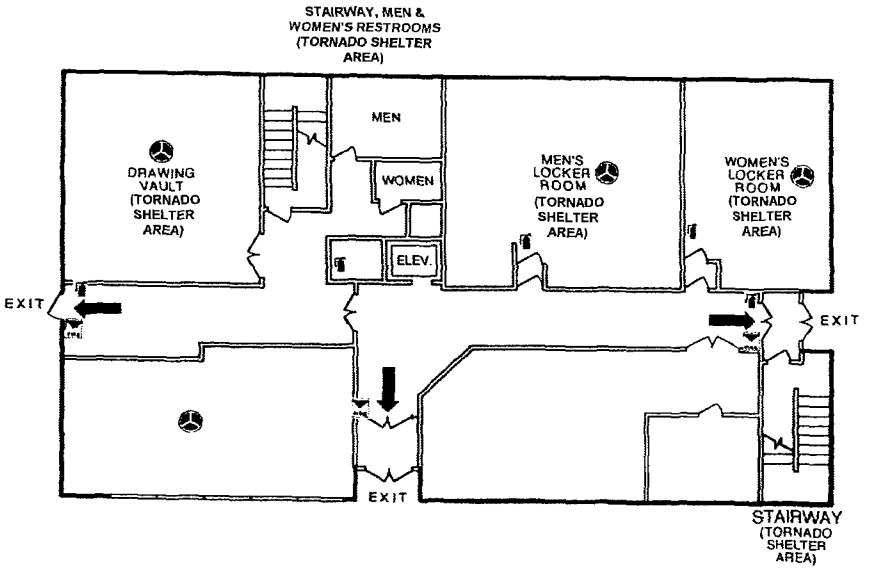
REVISED JUNE 2012

Figure E-15

Double Eagle Steel Coating Company

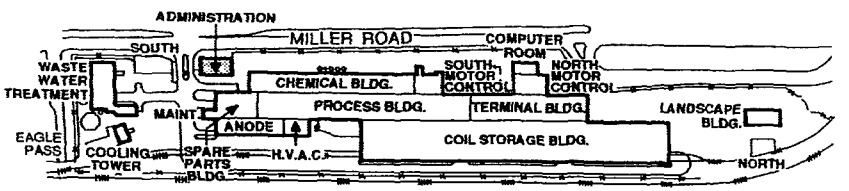
ADMINISTRATION BUILDING

FIRST FLOOR - FIRE PROTECTION



N

SITE PLAN



NOTES:

KEY

- TO OUTSIDE EXIT
- FIRE EXTINGUISHER
- SMOKE DETECTOR
- FIRE ALARM PULL BOX

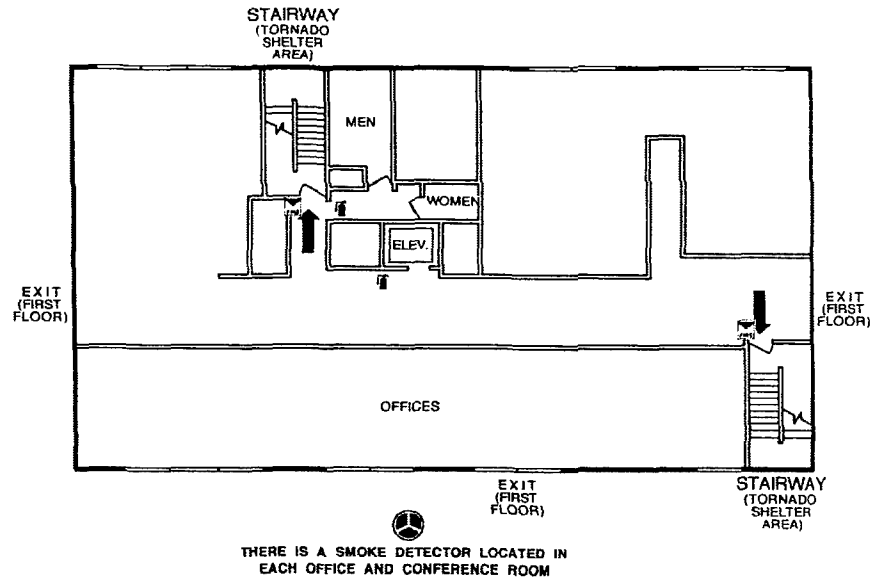
REVISED JUNE 2012

Figure E-16

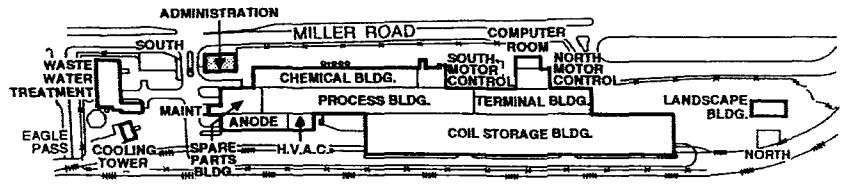
Double Eagle Steel Coating Company

ADMINISTRATION BUILDING

SECOND FLOOR - FIRE PROTECTION



SITE PLAN



NOTES:

KEY

- TO OUTSIDE EXIT
- FIRE EXTINGUISHER
- SMOKE DETECTOR
- FIRE ALARM PULL BOX

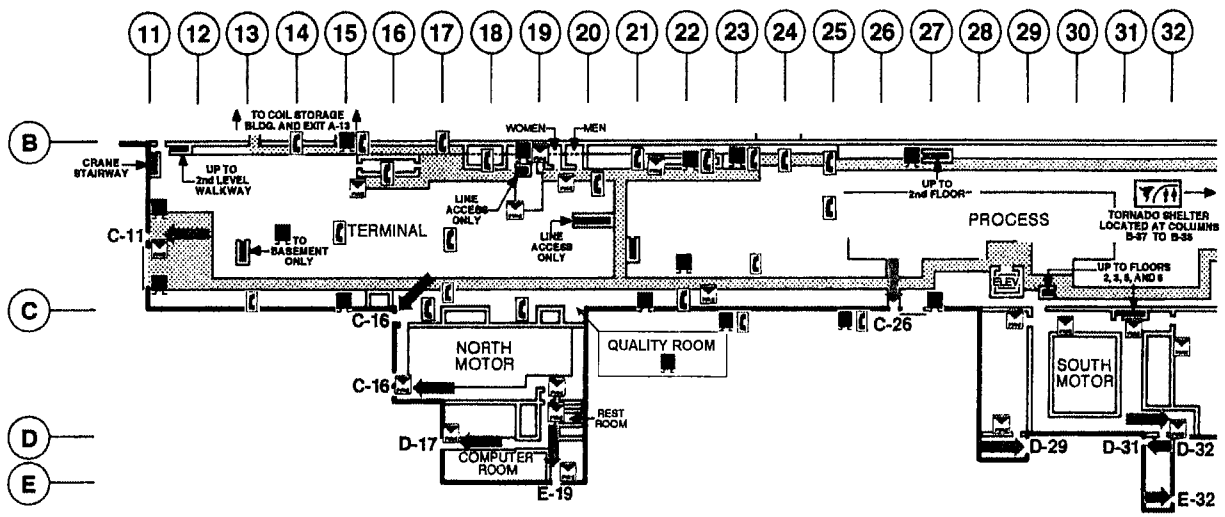
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure F-1

TERMINAL BUILDING

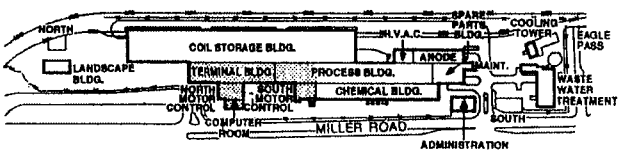
FIRST FLOOR - EMERGENCY ACTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

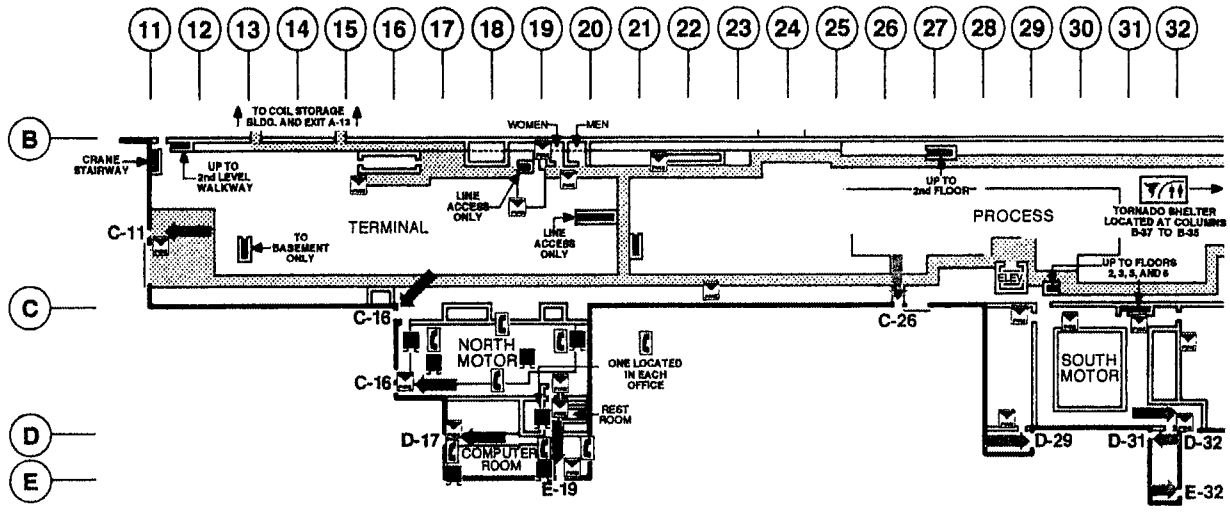
REVISED JUNE 2012

Figure F-2

Double Eagle Steel Coating Company

NORTH MOTOR ROOM & COMPUTER ROOM

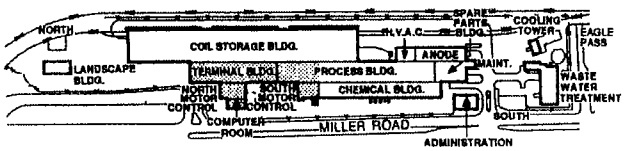
FIRST FLOOR - EMERGENCY ACTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1 etc. EXIT LOCATION
- MAIN AISLE
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

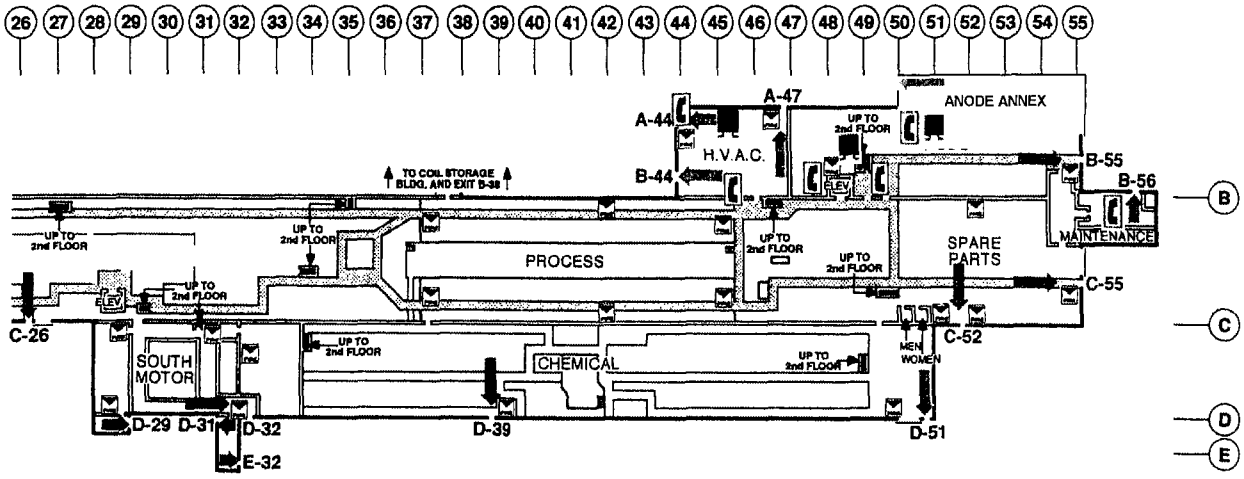
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure F-3

H.V.A.C. & ANODE BUILDINGS

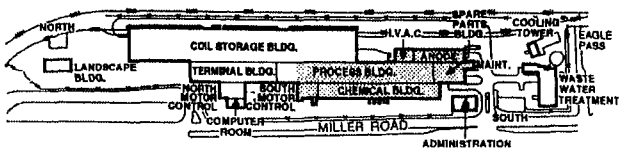
FIRST FLOOR - EMERGENCY ACTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

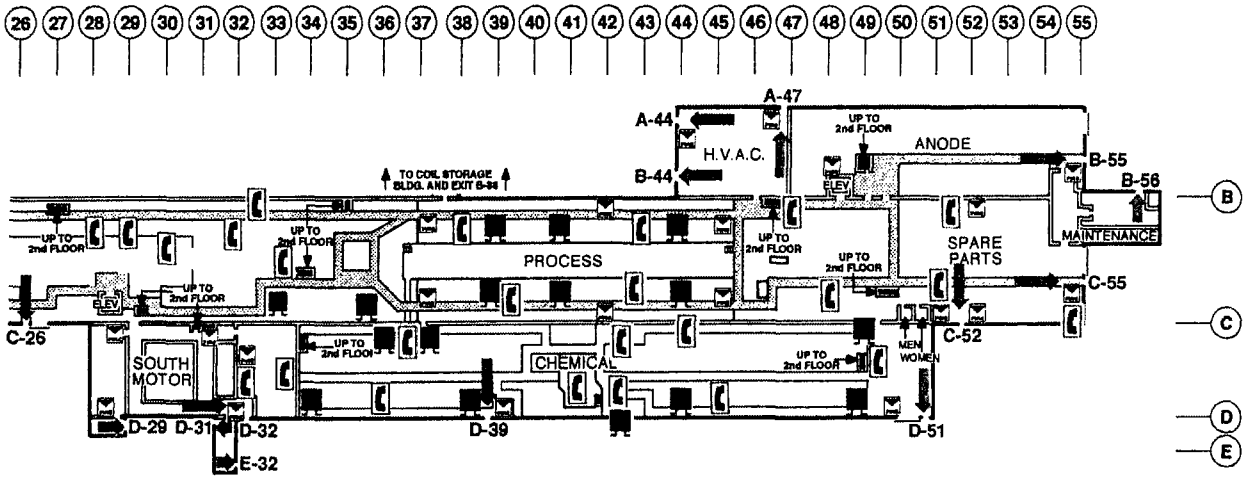
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure F-4

PROCESS & CHEMICAL BUILDINGS

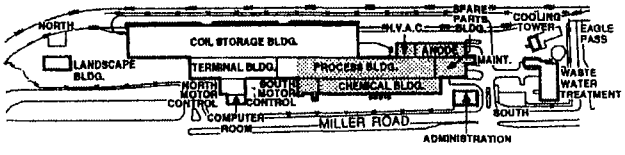
FIRST FLOOR - EMERGENCY ACTION



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

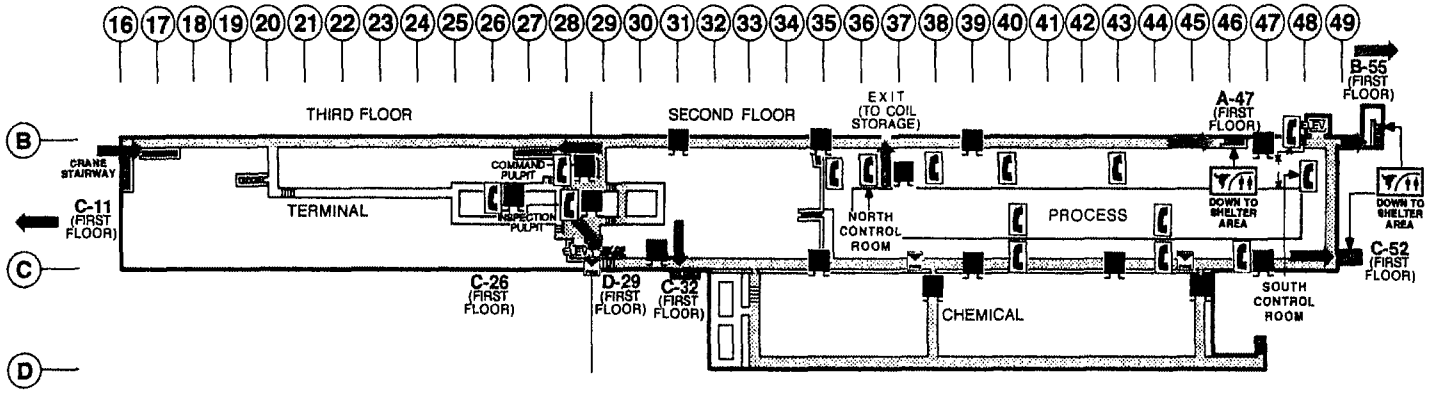
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure F-5

PROCESS & CHEMICAL BUILDINGS

SECOND & THIRD FLOOR - EMERGENCY ACTION

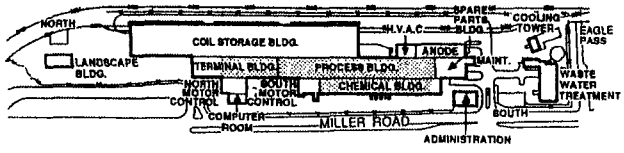


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

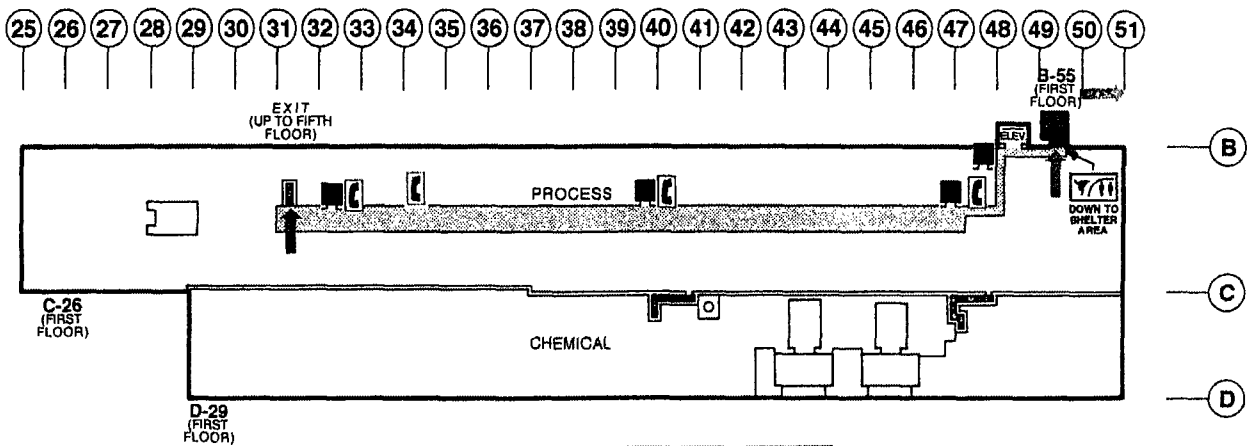
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure F-6

PROCESS & CHEMICAL BUILDINGS

FOURTH FLOOR - EMERGENCY ACTION

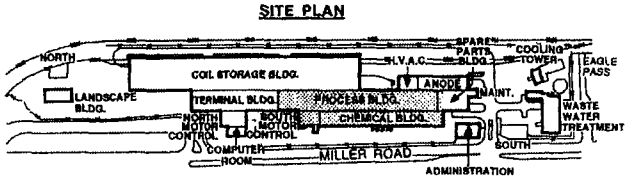


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

N

NOTES:

SITE PLAN



KEY

A-1etc.	EXIT LOCATION
	MAIN AISLE
	P.A. / PHONE LOCATION
	EMERGENCY LIGHTING

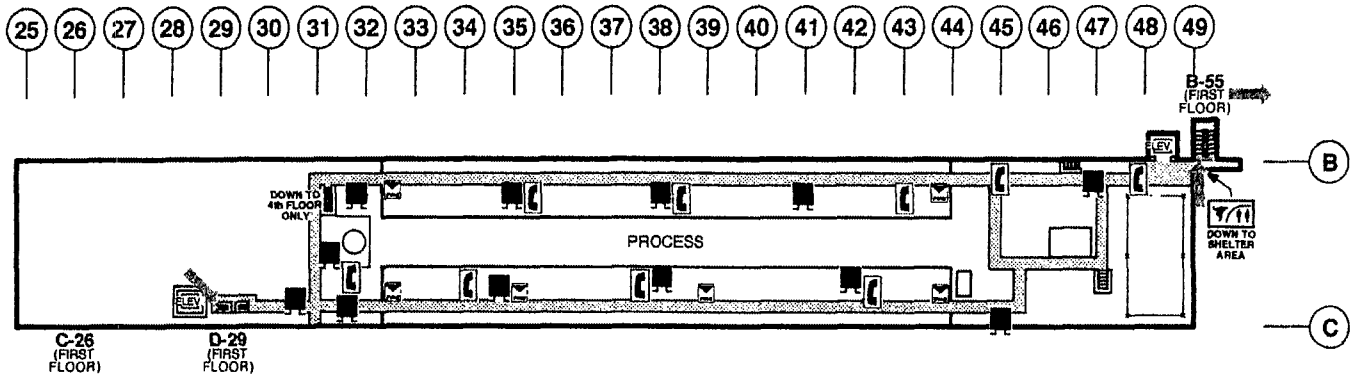
REVISED JUNE 2012

Figure F-7

Double Eagle Steel Coating Company

PROCESS BUILDING

FIFTH FLOOR - EMERGENCY ACTION

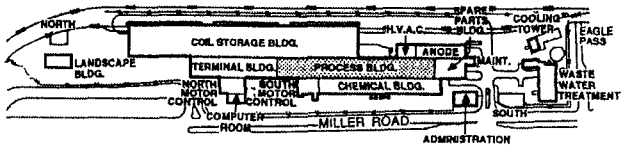


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

FIRE	FIRE ALARM PULL BOX
A-1etc.	EXIT LOCATION
	MAIN AISLE
	P.A. / PHONE LOCATION
	EMERGENCY LIGHTING

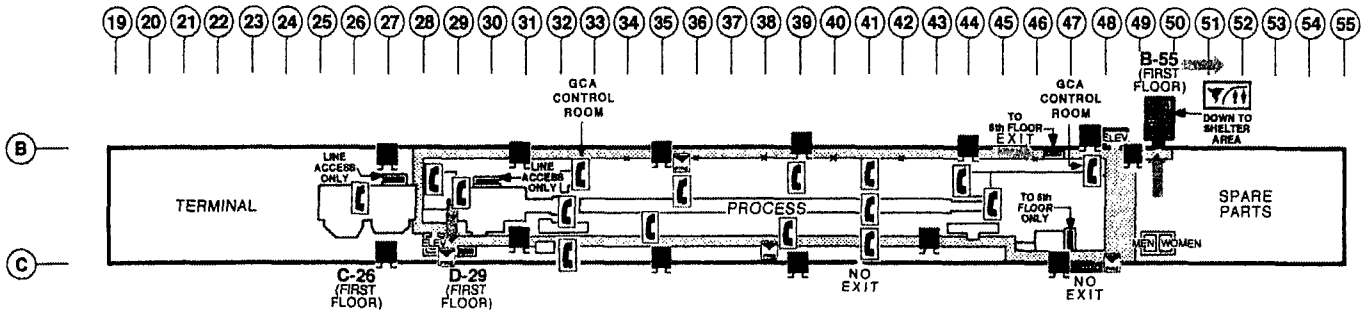
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure F-8

PROCESS BUILDING

SIXTH FLOOR - EMERGENCY ACTION

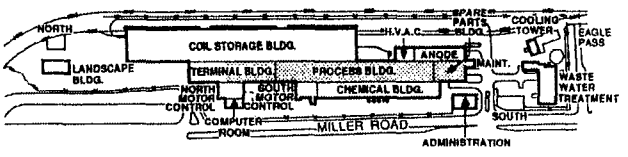


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

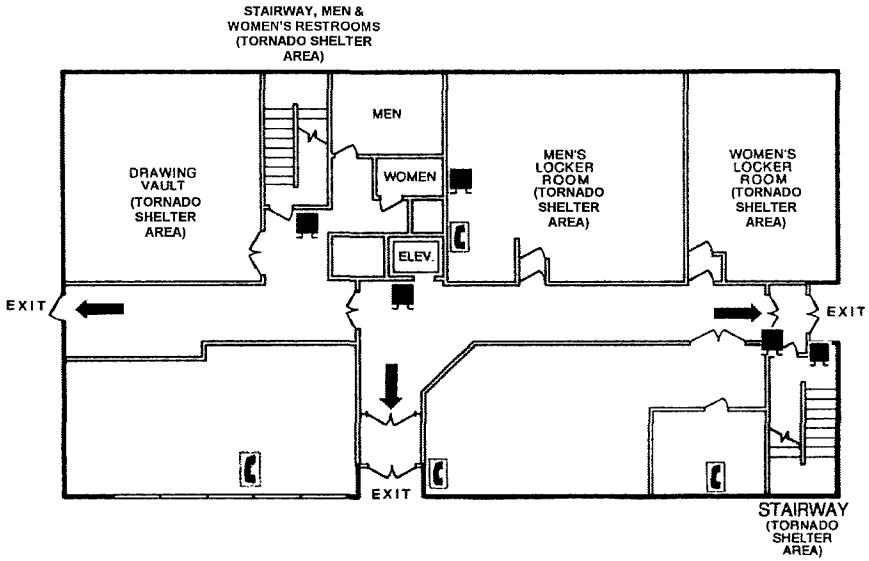
REVISED JUNE 2012

Figure F-9

Double Eagle Steel Coating Company

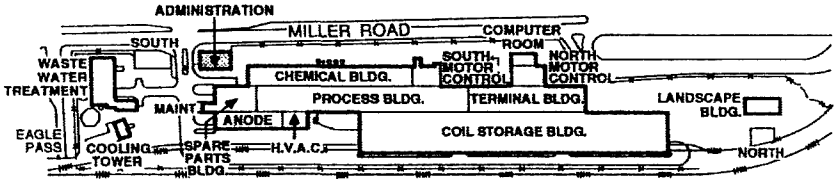
ADMINISTRATION BUILDING

FIRST FLOOR - EMERGENCY ACTION



N

SITE PLAN



NOTES:

KEY

- TO OUTSIDE EXIT
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

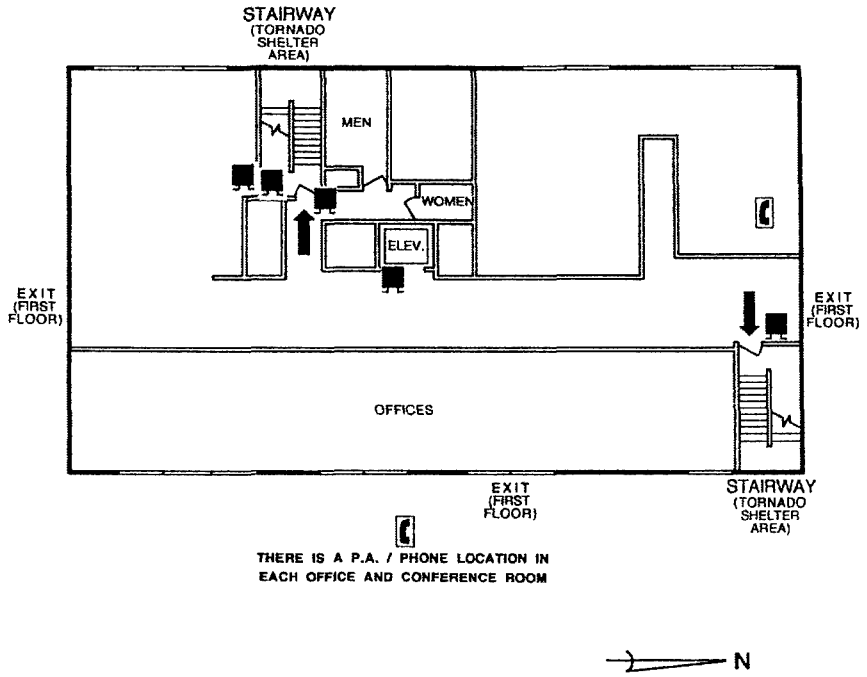
REVISED JUNE 2012

Figure F-10

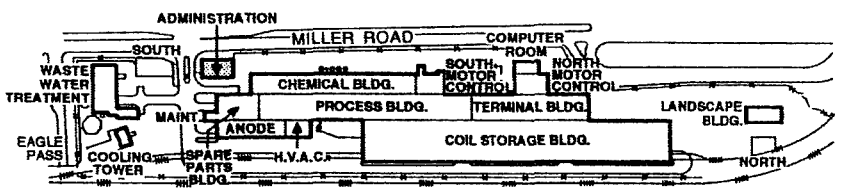
Double Eagle Steel Coating Company

ADMINISTRATION BUILDING

SECOND FLOOR - EMERGENCY ACTION



SITE PLAN



NOTES:

KEY

- TO OUTSIDE E X I T
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

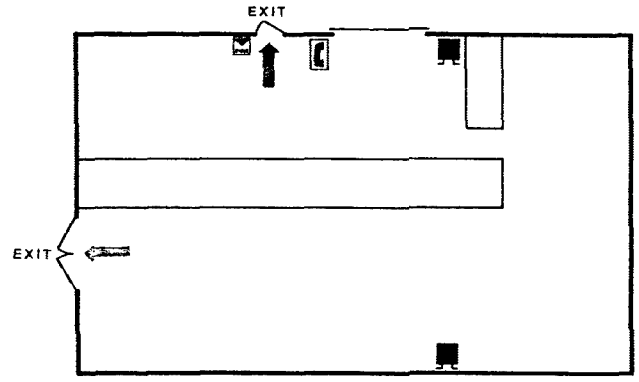
REVISED JUNE 2012

Figure F-11

Double Eagle Steel Coating Company

COOLING TOWER

EMERGENCY ACTION

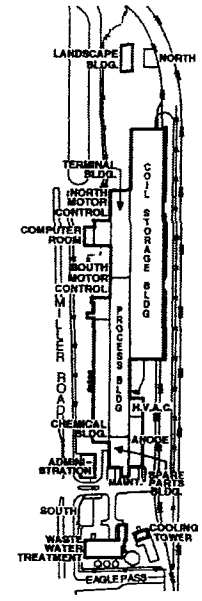


TORNADO SHELTER AREA

PROCEED TO WASTE WATER TREATMENT BUILDING

N

SITE PLAN



NOTES:

KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

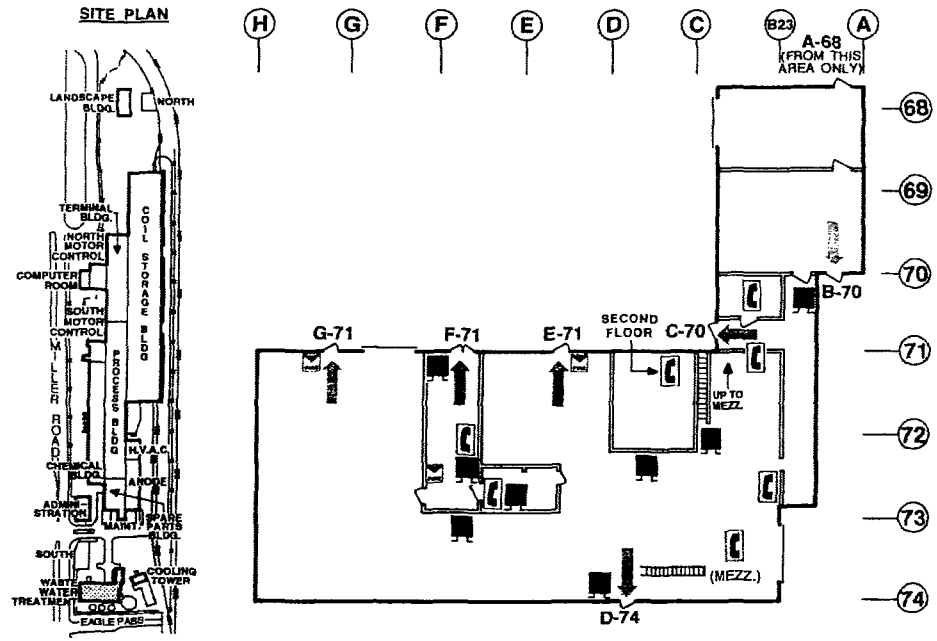
REVISED JUNE 2012

Figure F-12

Double Eagle Steel Coating Company

WASTE WATER TREATMENT

EMERGENCY ACTION



N

NOTES:

KEY

FIRE ALARM PULL BOX

A-1etc. EXIT LOCATION

P.A. / PHONE LOCATION

EMERGENCY LIGHTING

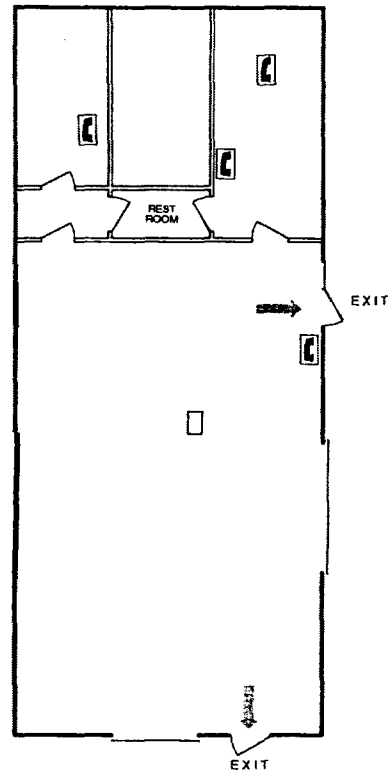
REVISED JUNE 2012

Figure F-13

Double Eagle Steel Coating Company

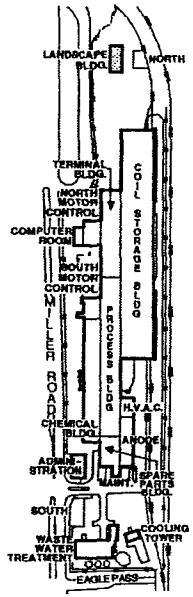
LANDSCAPE BUILDING

EMERGENCY ACTION



NOTES:

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- P.A. / PHONE LOCATION

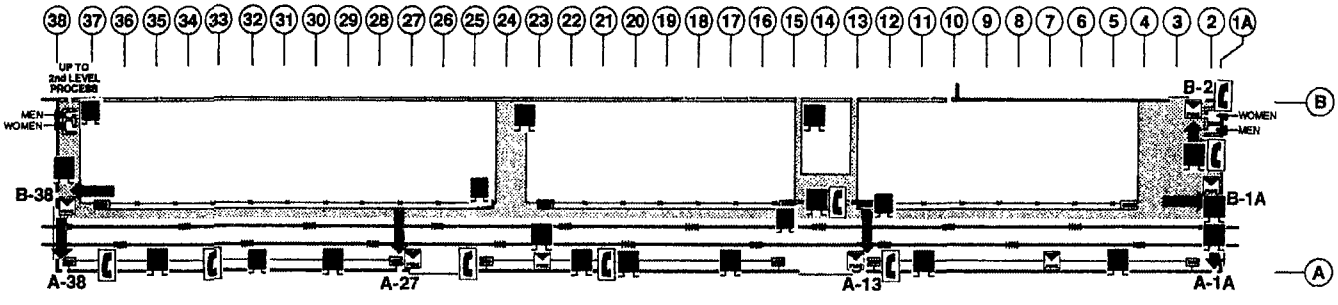
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure F-14

COIL STORAGE

EMERGENCY ACTION



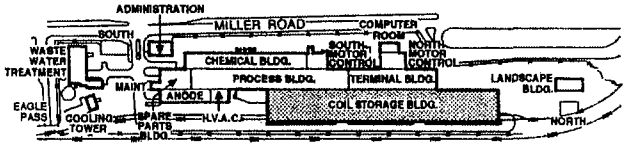
TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-49 TO 46 AND C-49 TO 46

NOTES:

CEC did not verify items located within the fenced coil storage area.

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

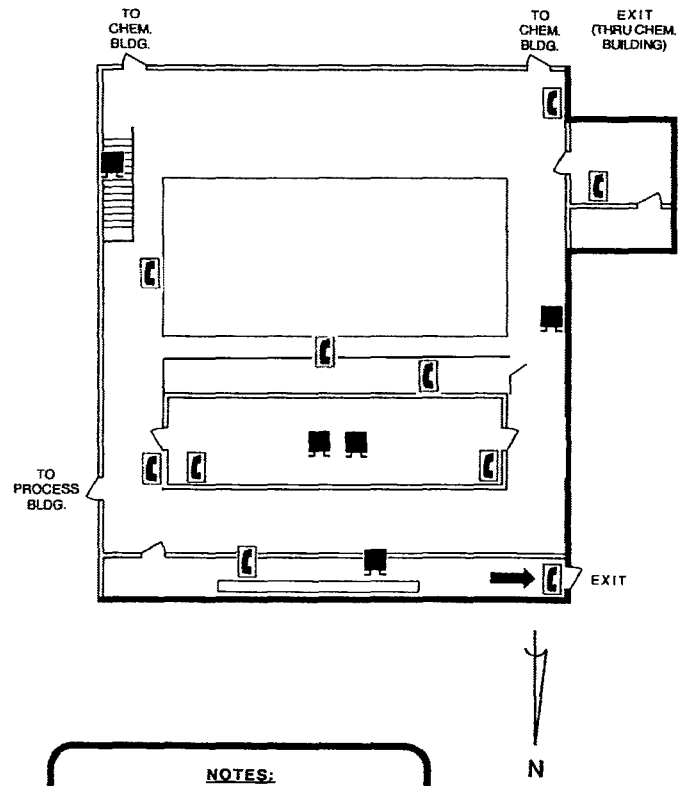
REVISED JUNE 2012

Figure F-15

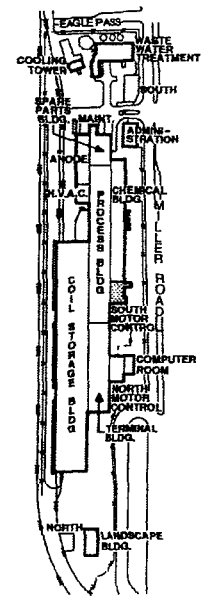
Double Eagle Steel Coating Company

SOUTH MOTOR ROOM - FIRST FLOOR

EMERGENCY ACTION



SITE PLAN



NOTES:

KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

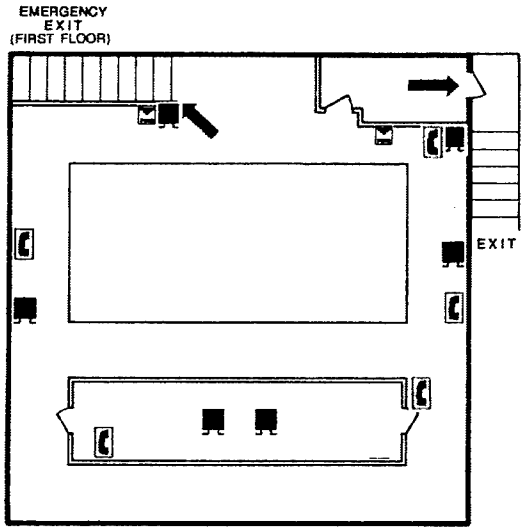
REVISED JUNE 2012

Figure F-16

Double Eagle Steel Coating Company

SOUTH MOTOR ROOM - SECOND FLOOR

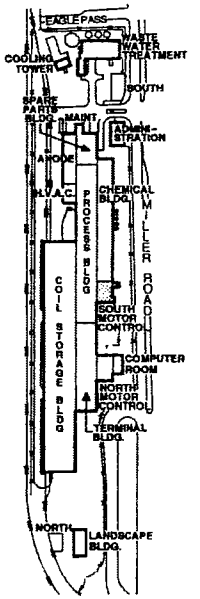
EMERGENCY ACTION



TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

N

SITE PLAN



NOTES:

KEY

- FIRE ALARM PULL BOX
- TO OUTSIDE EXIT
- P.A. / PHONE LOCATION
- EMERGENCY LIGHTING

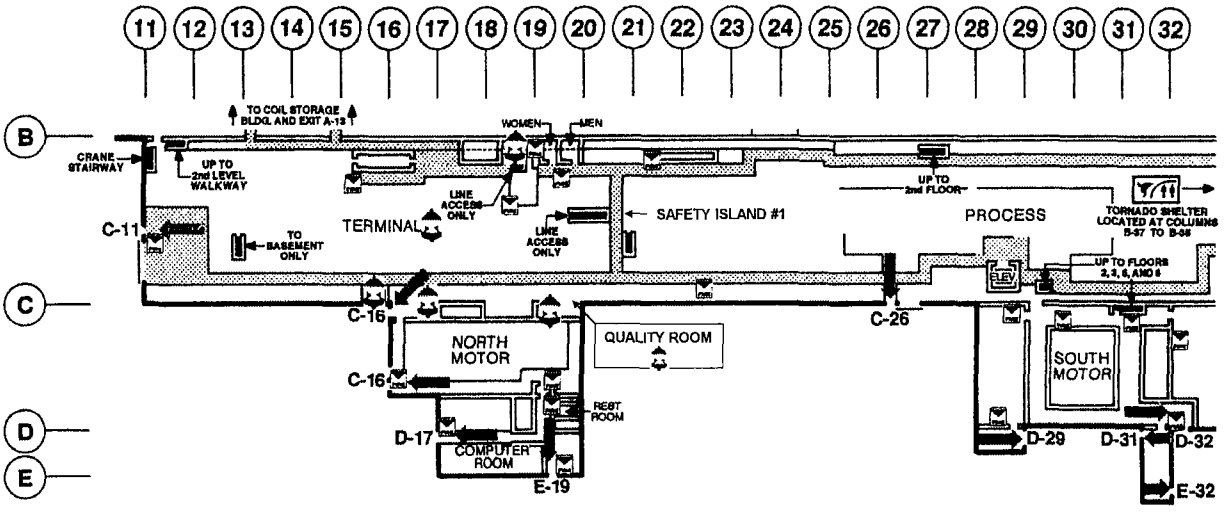
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure G-1

TERMINAL BUILDING

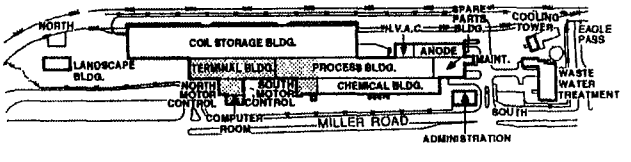
FIRST FLOOR - EMERGENCY EQUIPMENT



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- EYEWASH / SHOWER

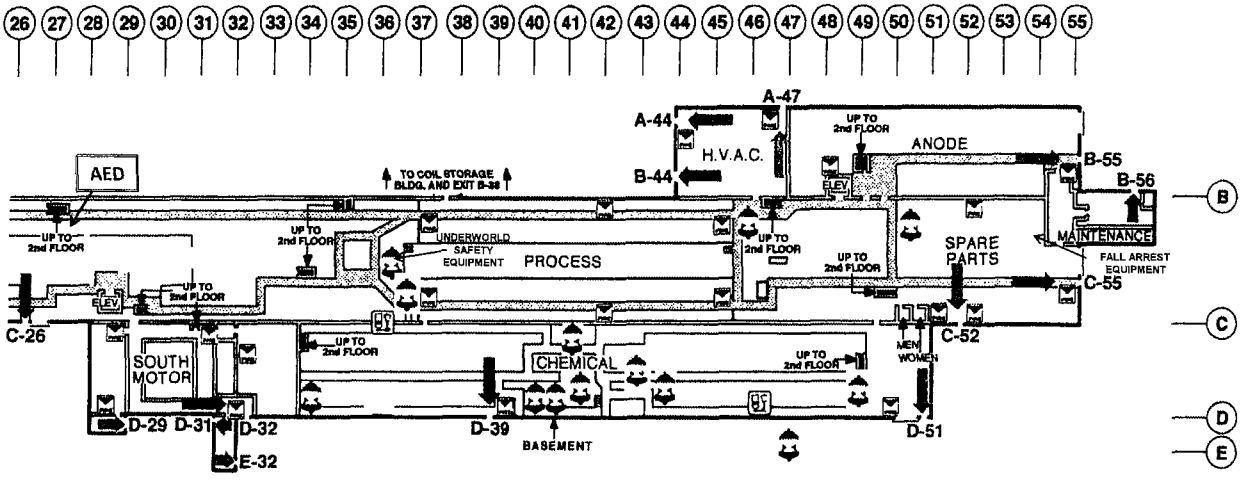
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure G-2

PROCESS & CHEMICAL BUILDINGS

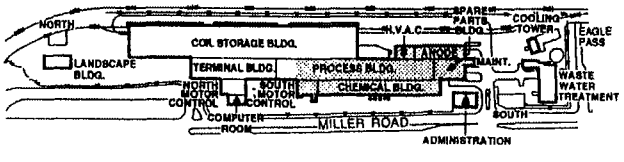
FIRST FLOOR - EMERGENCY EQUIPMENT



NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- EYEWASH / SHOWER
- S.C.B.A.

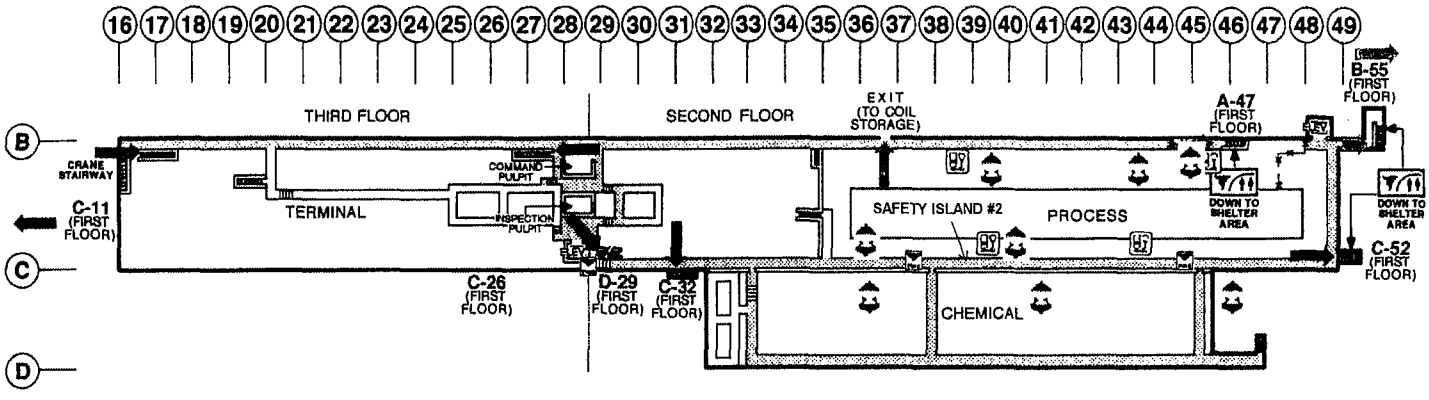
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure G-3

PROCESS & CHEMICAL BUILDINGS

SECOND & THIRD FLOOR - EMERGENCY EQUIPMENT

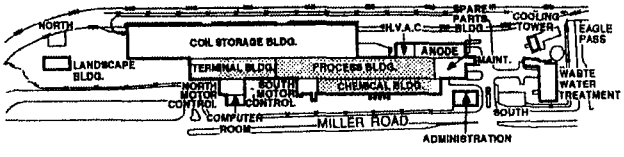


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1etc. EXIT LOCATION
- MAIN AISLE
- EYEWASH / SHOWER
- S.C.B.A.

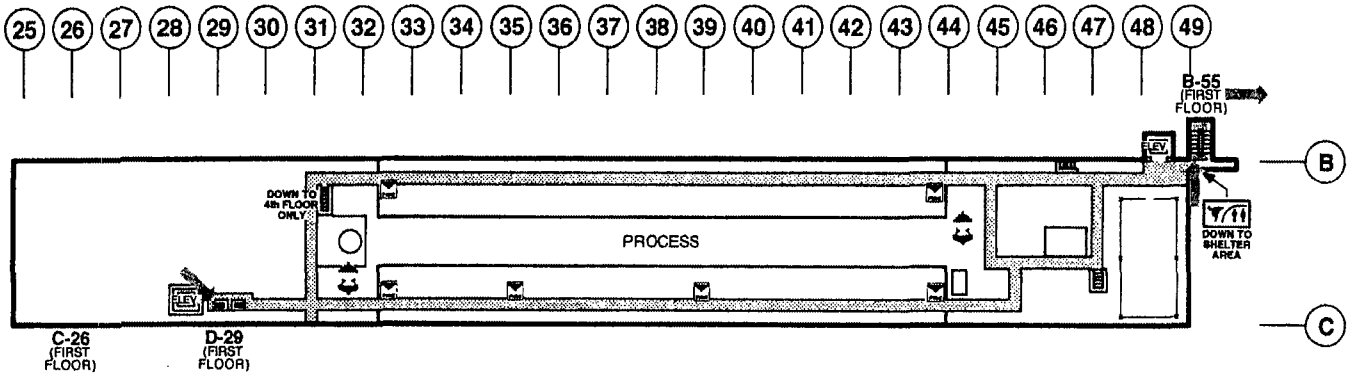
REVISED JUNE 2012

Double Eagle Steel Coating Company

Figure G-4

PROCESS BUILDING

FIFTH FLOOR - EMERGENCY EQUIPMENT

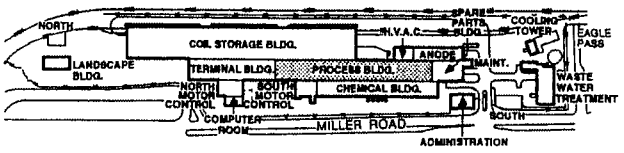


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-36

NOTES:

N

SITE PLAN



KEY

- FIRE ALARM PULL BOX
- A-1 etc. EXIT LOCATION
- MAIN AISLE
- EYEWASH / SHOWER

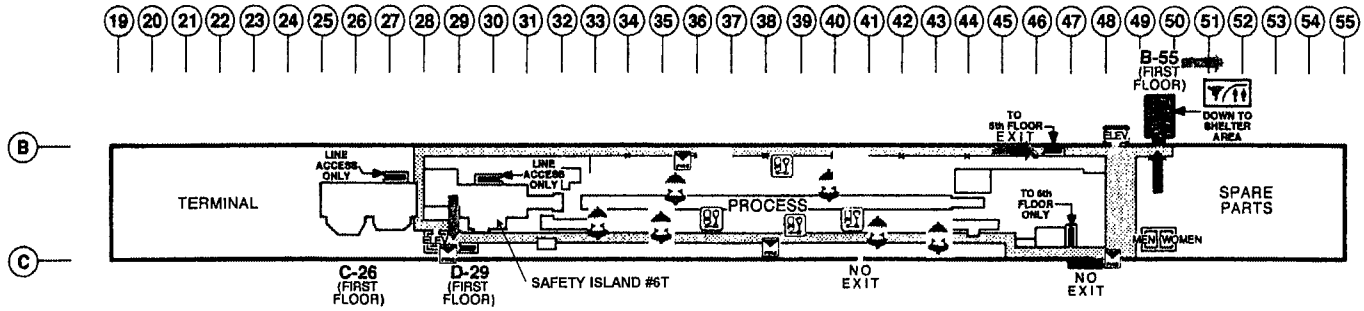
REVISED JUNE 2012

Figure G-5

Double Eagle Steel Coating Company

PROCESS BUILDING

SIXTH FLOOR - EMERGENCY EQUIPMENT

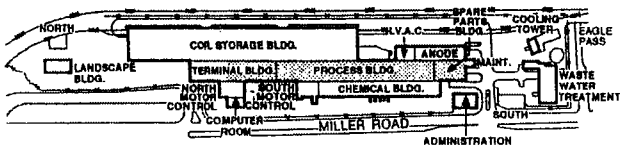


TORNADO SHELTER AREA
LOCATED AT FIRST FLOOR
COLUMNS B-37 TO B-35

NOTES:

N

SITE PLAN



KEY

FIRE ALARM PULL BOX	FIRE
A-1 etc.	EXIT LOCATION
MAIN AISLE	
EYEWASH / SHOWER	
S.C.B.A.	

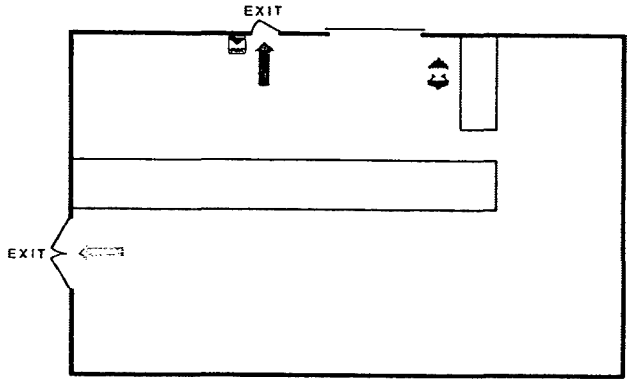
REVISED JUNE 2012

Figure G-6

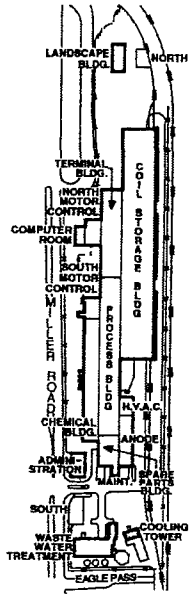
Double Eagle Steel Coating Company

COOLING TOWER

EMERGENCY EQUIPMENT



SITE PLAN



TORNADO SHELTER AREA

PROCEED TO WASTE WATER TREATMENT BUILDING

N

NOTES:

KEY

FIRE ALARM PULL BOX

TO OUTSIDE EXIT

EYEWASH / SHOWER

REVISED JUNE 2012

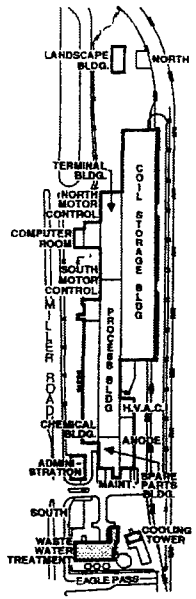
Figure G-7

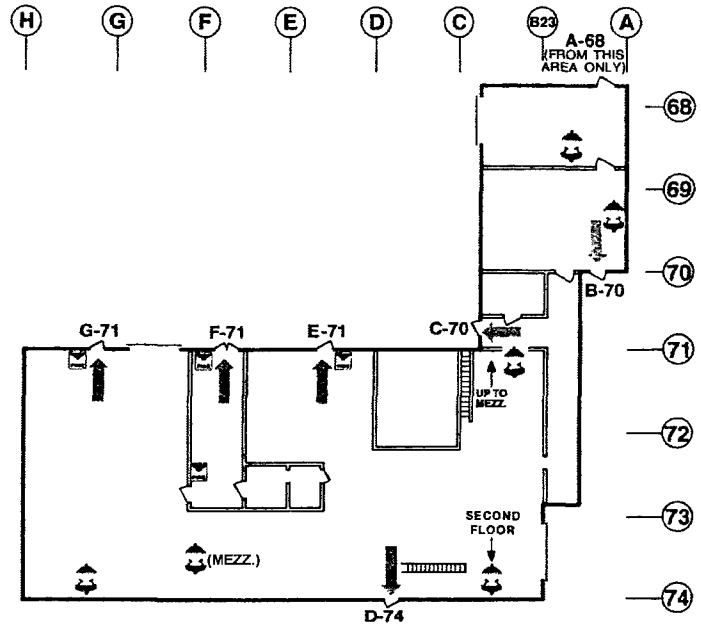
Double Eagle Steel Coating Company

WASTE WATER TREATMENT

EMERGENCY EQUIPMENT

SITE PLAN





N

NOTES:

KEY

FIRE ALARM PULL BOX

A-1etc. EXIT LOCATION

EYEWASH / SHOWER

REVISED JUNE 2012

Appendix H – Quick Cards
Index

H-1 Alloy Plating Solution, Tank 60 – Alloy Surge Tank

H-2 Alloy Plating Solution, Tank 70 – Alloy Surge Tank

H-3 Alloy Plating Solution, Tank 100 – Alloy Surge Tank

H-4 Caustic Soda, Tank 15 – Formula 618 DE

H-5 Caustic Soda, Tank 46 – Sodium Hydroxide, Waste Water Treatment

H-6 Citric Acid – Chemical Building

H-7 Ferrous Chloride, Tank 4 – Inside Dike

H-8 Hydrated Lime Silo – Outside of Waste Water Treatment

H-9 Hydrochloric Acid, Tanks 8 and 9

H-10 Hydrochloric Acid (6% - 16%), Pickle Recirculating Tank 10

H-11 Potassium Chloride (KCL), Tank 55 – Outside Chemical Building

H-12 Sulfuric Acid, Tank 45 – Waste Water Treatment

H-13 USS-P Mixture – Chemical Building

H-14 USSPXP 9010, Tank 5 – Grain Refiner

H-15 Waste Pickle Dump Holding Tank 11

H-16 Zinc Chloride (62.5%) Solution, Tank 3

H-17 Zinc Plating Solution, Tank 200 – Zinc Recirculation Tank

DOUBLE EAGLE
STEEL COATING COMPANY

Alloy Plating Solution
TANK 60 – Alloy Surge Tank

Tank 60 is located inside the plant at Column C-33 inside a dike inside the Process Building. Tank is filled with a mixture of chemicals listed below:

Hydrochloric Acid	Potassium Chloride
Citric Acid	Ferrous Chloride Solution
USSP- 435-254	Zinc Chloride – Technical Grade
Zinc Metal High Grade Anodes	Iron Anodes

Alloy Plating Solution is rusty colored aqueous liquid with a pungent odor. Ph range is 1.9 to 4.0 (typically 3.6 to 3.8). Fumes irritate the eyes and mucous membranes. Very corrosive to metals and tissue. This solution is used in the cells of the plating line and pumped throughout the plant in FRP pipe. **This tank is used to receive and store excess alloy plating solution only at times of need.**

HEALTH HAZARDS
TOXIC; inhalation, ingestion or contact (skin, eyes) with vapors, dusts or substance may cause severe injury, burns, or death. Reaction with water or moist air will release toxic, corrosive or flammable gases. Reaction with water may generate much heat, which will increase the concentration of fumes in the air. Fire will produce irritating, corrosive and/or toxic gases. Runoff from fire control or dilution water may be corrosive and/or toxic and cause pollution.

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
HYDROCHLORIC ACID, SOLUTION is an aqueous solution of hydrogen chloride, an acidic gas, Reacts exothermically with organic bases (amines, amides) and inorganic bases (oxides and hydroxides of metals). Reacts exothermically with carbonates (including limestone and building materials containing limestone) and hydrogen carbonates to generate carbon dioxide. Reacts with sulfides, carbides, borides, and phosphides to generate toxic or flammable gases. Reacts with many metals (including aluminum, zinc, calcium, magnesium, iron, tin and all of the alkali metals) to generate flammable hydrogen gas. Reacts violently with acetic anhydride, 2-aminoethanol, ammonium hydroxide, calcium phosphide, chlorosulfonic acid, 1,1-difluoroethylene, ethylenediamine, ethyleneimine, oleum, perchloric acid, b-propiolactone, propylene oxide, silver perchlorate/carbon tetrachloride mixture, sodium hydroxide, uranium(IV) phosphide, vinyl acetate, calcium carbide, rubidium carbide, cesium acetylide, rubidium acetylide, magnesium boride, mercury(II) sulfate [Lewis]. Mixtures with concentrated sulfuric acid can evolve toxic hydrogen chloride gas at a dangerous rate. Undergoes a very energetic reaction with calcium phosphide [Mellor 8:841(1946-1947)].

REACTIVE GROUPS:
Acids, Inorganic Non-oxidizing (Reactivity, 2001)
Move victim to fresh air. Call 911 or emergency medical service. Apply artificial respiration if victim is not breathing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult. Remove and isolate contaminated clothing and shoes. In case of contact with substance, immediately flush skin or eyes with running water for at least 30 minutes. For minor skin contact, avoid spreading material on unaffected skin. Keep victim warm and quiet. Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. (DOT, 2000)

Avoid breathing vapors. Keep upwind. Avoid bodily contact with the material. Wear appropriate chemical protective gloves, boots and goggles. Do not handle broken packages unless wearing appropriate personal protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water. If contact with the material anticipated, wear appropriate chemical protective clothing. (© AAR, 1999)

Personal Protective Equipment-

Full Face Piece Air Purifying Respirator or Self Contained Breathing Apparatus
Chemical Splash Goggles and Full Face Splash Shield
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

MATERIAL RATINGS

NAT RUB
GLOVES > 3 hours

NEOP
GLOVES > 3 hours

NITRILE
GLOVES > 3 hours

NITRILE+PVC
FABRIC > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

PVC
FABRIC > 3 hours
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

ALLOY PLATING SOLUTION
TANK 60

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 157 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or Self Contained Breathing Apparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

4. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks.
   NEUTRALIZE WITH LIME SLURRY (Available at WWT, near Door 14).
   DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager.

   Ampho-Mag® neutralizer is available in Fire Pump House

Information derived from Hydrochloric Acid MSDS
Revision #5

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn. Move victim to fresh air. If the victim has difficult breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Eye: Immediately flush eyes with large amounts of water for at least 15 minutes, by the clock, while holding eyelids open. Transport to the nearest medical facility for additional treatment. **Do not rub eyes.**

Skin: Remove contaminated clothing. Immediately flush with large amounts of water for at least 15 minutes, by the clock, and follow by washing with soap if available. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with water, then drink sips of water to remove taste from mouth. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. Transport to nearest medical facility for additional treatment.

DOUBLE EAGLE
STEEL COATING COMPANY

Alloy Plating Solution
TANK 70 – Alloy Surge Tank

Tank 70 is located inside the west side of the plant at Column D-37 inside an addition that protrudes from the main Chemical Building. Tank 70 has a capacity of 33,000 gallons

Tank is filled with a mixture of chemicals listed below:

Hydrochloric Acid	< 1%	Potassium Chloride ≈550g/l
Citric Acid	< 0.1%	Ferrous Chloride Solution <0.5%
USSP- 435-254	< 2.5ml/l	Zinc Chloride – Technical Grade
Zinc Metal High Grade Anodes	< 70g/l	Iron Anodes (Sludge)

Alloy Plating Solution is rusty colored aqueous liquid with a pungent odor. pH range is 1.9 to 4.0 (typically 3.6 to 3.8). Fumes irritate the eyes and mucous membranes. Very corrosive to metals and tissue. This solution is used in the cells of the plating line and pumped throughout the plant in FRP pipe. **This tank is used to receive and store excess alloy plating solution only at times of need.**

HEALTH HAZARDS
TOXIC; inhalation, ingestion or contact (skin, eyes) with vapors, dusts or substance may cause severe injury, burns, or death. Reaction with water or moist air will release toxic, corrosive or flammable gases. Reaction with water may generate much heat, which will increase the concentration of fumes in the air. Fire will produce irritating, corrosive and/or toxic gases. Runoff from fire control or dilution water may be corrosive and/or toxic and cause pollution.

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
HYDROCHLORIC ACID, SOLUTION is an aqueous solution of hydrogen chloride, an acidic gas, Reacts exothermically with organic bases (amines, amides) and inorganic bases (oxides and hydroxides of metals). Reacts exothermically with carbonates (including limestone and building materials containing limestone) and hydrogen carbonates to generate carbon dioxide. Reacts with sulfides, carbides, borides, and phosphides to generate toxic or flammable gases. Reacts with many metals (including aluminum, zinc, calcium, magnesium, iron, tin and all of the alkali metals) to generate flammable hydrogen gas. Reacts violently with acetic anhydride, 2-aminoethanol, ammonium hydroxide, calcium phosphide, chlorosulfonic acid, 1,1-difluoroethylene, ethylenediamine, ethyleneimine, oleum, perchloric acid, b-propiolactone, propylene oxide, silver perchlorate/carbon tetrachloride mixture, sodium hydroxide, uranium(IV) phosphide, vinyl acetate, calcium carbide, rubidium carbide, cesium acetylide, rubidium acetylide, magnesium boride, mercury(II) sulfate [Lewis]. Mixtures with concentrated sulfuric acid can evolve toxic hydrogen chloride gas at a dangerous rate. Undergoes a very energetic reaction with calcium phosphide [Mellor 8:841(1946-1947)].

REACTIVE GROUPS:
Acids, Inorganic Non-oxidizing (Reactivity, 2001)
Move victim to fresh air. Call 911 or emergency medical service. Apply artificial respiration if victim is not breathing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult. Remove and isolate contaminated clothing and shoes. In case of contact with substance, immediately flush skin or eyes with running water for at least 30 minutes. For minor skin contact, avoid spreading material on unaffected skin. Keep victim warm and quiet. Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. (DOT, 2000)

Avoid breathing vapors. Keep upwind. Avoid bodily contact with the material. Wear appropriate chemical protective gloves, boots and goggles. Do not handle broken packages unless wearing appropriate personal protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water. If contact with the material anticipated, wear appropriate chemical protective clothing. (© AAR, 1999)

Personal Protective Equipment-

Full Face Piece Air Purifying Respirator or Self Contained Breathing Apparatus
Chemical Splash Goggles and Full Face Splash Shield
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

MATERIAL RATINGS

NAT RUB
GLOVES > 3 hours

NEOP
GLOVES > 3 hours

NITRILE
GLOVES > 3 hours

NITRILE+PVC
FABRIC > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

PVC
FABRIC > 3 hours
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

ALLOY PLATING SOLUTION
TANK 70

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 157 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or **S**elf **C**ontained **B**reathing **A**pparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

4. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks. NEUTRALIZE WITH LIME SLURRY (Available at WWT, near Door 14). DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager. Ampho-Mag® neutralizer is available in Fire Pump House

Information derived from Hydrochloric Acid MSDS

Revision #6

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn. Move victim to fresh air. If the victim has difficult breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Eye: Immediately flush eyes with large amounts of water for at least 15 minutes, by the clock, while holding eyelids open. Transport to the nearest medical facility for additional treatment. **Do not rub eyes.**

Skin: Remove contaminated clothing. Immediately flush with large amounts of water for at least 15 minutes, by the clock, and follow by washing with soap if available. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with water, then drink sips of water to remove taste from mouth. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. Transport to nearest medical facility for additional treatment.

DOUBLE EAGLE
STEEL COATING COMPANY

Alloy Plating Solution
TANK 100 – Alloy Recirculation Tank

Tank 100 is located in the north end of the Chemical Building. It is a rubber lined concrete tank with pumps located on its top. The capacity of Tank 100 is 270,000 gallons.

Tank is filled with a mixture of chemicals listed below:

Hydrochloric Acid	< 1%	Potassium Chloride ≈550g/l
Citric Acid	< 0.1%	Ferrous Chloride Solution <0.5%
USSP- 435-254	< 2.5ml/l	Zinc Chloride – Technical Grade
Zinc Metal High Grade Anodes	< 70g/l	Iron Anodes (Sludge)

Alloy Plating Solution is rusty colored aqueous liquid with a pungent odor. pH range is 1.9 to 4.0 (typically 3.6 to 3.8). Fumes irritate the eyes and mucous membranes. Very corrosive to metals and tissue. This solution is used in the cells of the plating line and pumped throughout the plant in FRP pipe. **This tank is used to receive and store alloy plating solution.**

HEALTH HAZARDS
TOXIC; inhalation, ingestion or contact (skin, eyes) with vapors, dusts or substance may cause severe injury, burns, or death. Reaction with water or moist air will release toxic, corrosive or flammable gases. Reaction with water may generate much heat, which will increase the concentration of fumes in the air. Fire will produce irritating, corrosive and/or toxic gases. Runoff from fire control or dilution water may be corrosive and/or toxic and cause pollution.

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
HYDROCHLORIC ACID, SOLUTION is an aqueous solution of hydrogen chloride, an acidic gas, Reacts exothermically with organic bases (amines, amides) and inorganic bases (oxides and hydroxides of metals). Reacts exothermically with carbonates (including limestone and building materials containing limestone) and hydrogen carbonates to generate carbon dioxide. Reacts with sulfides, carbides, borides, and phosphides to generate toxic or flammable gases. Reacts with many metals (including aluminum, zinc, calcium, magnesium, iron, tin and all of the alkali metals) to generate flammable hydrogen gas. Reacts violently with acetic anhydride, 2-aminoethanol, ammonium hydroxide, calcium phosphide, chlorosulfonic acid, 1,1-difluoroethylene, ethylenediamine, ethyleneimine, oleum, perchloric acid, b-propiolactone, propylene oxide, silver perchlorate/carbon tetrachloride mixture, sodium hydroxide, uranium(IV) phosphide, vinyl acetate, calcium carbide, rubidium carbide, cesium acetylide, rubidium acetylide, magnesium boride, mercury(II) sulfate [Lewis]. Mixtures with concentrated sulfuric acid can evolve toxic hydrogen chloride gas at a dangerous rate. Undergoes a very energetic reaction with calcium phosphide [Mellor 8:841(1946-1947)].

REACTIVE GROUPS:
Acids, Inorganic Non-oxidizing (Reactivity, 2001)
Move victim to fresh air. Call 911 or emergency medical service. Apply artificial respiration if victim is not breathing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult. Remove and isolate contaminated clothing and shoes. In case of contact with substance, immediately flush skin or eyes with running water for at least 30 minutes. For minor skin contact, avoid spreading material on unaffected skin. Keep victim warm and quiet. Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. (DOT, 2000)

Avoid breathing vapors. Keep upwind. Avoid bodily contact with the material. Wear appropriate chemical protective gloves, boots and goggles. Do not handle broken packages unless wearing appropriate personal protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water. If contact with the material anticipated, wear appropriate chemical protective clothing. (© AAR, 1999)

Personal Protective Equipment-

Full Face Piece Air Purifying Respirator or Self Contained Breathing Apparatus
Chemical Splash Goggles and Full Face Splash Shield
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

MATERIAL RATINGS

NAT RUB
GLOVES > 3 hours

NEOP
GLOVES > 3 hours

NITRILE
GLOVES > 3 hours

NITRILE+PVC
FABRIC > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

PVC
FABRIC > 3 hours
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

ALLOY PLATING SOLUTION
TANK 100

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 157 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or Self Contained Breathing Apparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

4. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks. NEUTRALIZE WITH LIME SLURRY (Available at WWT, near Door 14). DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager. Ampho-Mag® neutralizer is available in Fire Pump House.

Information derived from Hydrochloric Acid MSDS
Revision #2

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn. Move victim to fresh air. If the victim has difficult breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Eye: Immediately flush eyes with large amounts of water for at least 15 minutes, by the clock, while holding eyelids open. Transport to the nearest medical facility for additional treatment. **Do not rub eyes.**

Skin: Remove contaminated clothing. Immediately flush with large amounts of water for at least 15 minutes, by the clock, and follow by washing with soap if available. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with water, then drink sips of water to remove taste from mouth. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. Transport to nearest medical facility for additional treatment.

DOUBLE EAGLE
STEEL COATING COMPANY

CAUSTIC SODA
Formula 618 - DE
TANK 15

Tank 15 is located inside the building at column C-17, just inside the door near the waste oil dike. Tank 15 has a capacity of 6,000 gallons.
Tank is filled from a truck pumping from outside into a fitting in a cabinet east of the entry door.

Formula 618-DE is a dark, thick liquid. More dense than water. Contact may severely irritate skin, eyes, and mucous membranes. Toxic by ingestion. Corrosive to metals and tissue. Density 13 lb / gal (© AAR, 1999).

Formula 618-DE is a brand name of Quaker Chemical product for Caustic Soda, Sodium Hydroxide, Lye.

HEALTH HAZARDS
Causes severe burns of eyes, skin, and mucous membranes. (USCG, 1999)

AIR AND WATER REACTIONS:
Slowly absorbs carbon dioxide from the air to give solid products as crusts or precipitates. Water soluble. Dilution with water liberates heat, possibly enough to cause local boiling and spattering.

CHEMICAL PROFILE:
CAUSTIC SODA, SOLUTION refers to an aqueous solution of sodium hydroxide. Strongly basic. Reacts rapidly and exothermically with organic and inorganic acids, with organic and inorganic acid anhydrides, including oxides of nonmetals such as sulfur dioxide, sulfur trioxide, phosphorus trioxide, phosphorus pentaoxide, and with organic and inorganic acid chlorides. May react explosively with maleic anhydride [MCA Case History 622 1960]. Attacks aluminum and zinc with evolution of hydrogen, a flammable gas. May initiate polymerization in polymerizable organic materials: a violent polymerization results if acetaldehyde contacts alkaline materials such as sodium hydroxide; an extremely violent polymerization results from contact of acrolein with alkaline materials such as sodium hydroxide [Chem. Safety Data Sheet SD-85 1961]. A violent explosion resulted when a quantity of pentol was accidentally brought in contact with a caustic cleaning solution chemically similar to aqueous sodium hydroxide [MCA Case History 363 1964]. Aqueous solutions of reducing sugars other than sucrose, when heated (above 84°C.), evolve toxic levels of carbon monoxide in the presence of alkalis or alkaline salts, such as sodium phosphate (also potassium hydroxide, sodium hydroxide, calcium hydroxide, etc.) [Bretherick 5th ed. 1995].

REACTIVE GROUPS:
Bases (Reactivity, 2001)

FIRST AID

Eye: If this chemical contacts the eyes, immediately wash the eyes with large amounts of water, occasionally lifting the lower and upper lids. Get medical attention immediately. Contact lenses should not be worn when working with this chemical.

Skin: If this chemical contacts the skin, immediately flush the contaminated skin with water. If this chemical penetrates the clothing, immediately remove the clothing and flush the skin with water. Get medical attention promptly.

Breathing: If a person breathes large amounts of this chemical, move the exposed person to fresh air at once. If breathing has stopped, perform mouth-to-mouth resuscitation. Keep the affected person warm and at rest. Get medical attention as soon as possible.

Swallow: If this chemical has been swallowed, get medical attention immediately. Do not induce vomiting. (NIOSH, 1997)

Personal Protective Equipment-

Skin: Wear appropriate personal protective clothing to prevent skin contact.
Eyes: Wear appropriate eye protection to prevent eye contact.
Wash skin: The worker should immediately wash the skin when it becomes contaminated.
Remove: Work clothing that becomes wet or significantly contaminated should be removed and replaced.
Change: Workers whose clothing may have become contaminated should change into uncontaminated clothing before leaving the work premise.
Provide: Eyewash, Quick drench (NIOSH, 1997)

MATERIAL RATINGS

NAT RUB+NEOP
GLOVES > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

CAUSTIC SODA - Formula 618 - DE
TANK 15

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 25 to 50 meters for "Hot Zone" (Guide 157 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or Self Contained Breathing Apparatus

* items not needed if wearing full face respirator.

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately remove all contaminated clothing as soon as possible.

3. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. Nearest sewer is near corner of Computer Building.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

4. Apply water spray or mist to cool a container. Water will create heat if applied directly to Caustic.

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks. Sawdust is also acceptable for soaking up material.
   DO NOT ATTEMPT TO NEUTRALIZE WITHOUT A GOOD KNOWLEDGE OF REACTION. DISPOSE OF MATERIAL IN SUITABLE CONTAINERS. Notify Environmental Manager.

Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

Take off all contaminated clothing immediately. Rinse immediately with plenty of water and seek medical advice.

Eye: Rinse immediately with plenty of water, also under the eyelids, for at lest 15 minutes. Consult a physician.

Skin: Rinse immediately with plenty of water for at lest 15 minutes. Remove and wash contaminated clothing before re-use. Consult a physician.

Inhalation: Move to fresh air in case of accidental inhalation of vapors. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Consult a physician.

Ingestion: If swallowed, get medical attention immediately, and show this container or label. DO NOT induce vomiting. Never give anything by mouth to an unconscious person.

Note to Physician: This product contains sodium hydroxide.

DOUBLE EAGLE
STEEL COATING COMPANY

CAUSTIC SODA
Sodium Hydroxide – Waste Water Treatment
TANK 46

Tank 46 is located inside the building at Waste Water Treatment, North Wing.
Capacity of tank is 12,000 gallons, goal is to keep 7,500 gallons.
Tank is filled from a truck pumping from outside into a fitting in a cabinet west of the door.

Caustic Soda is a colorless, odorless, thick liquid. More dense than water. Contact may cause burns to the respiratory tract, skin, eyes and gastrointestinal tract. May cause permanent eye damage. Density 13 lb / gal max.

This product is used to remove metals from the waste water stream by raising the pH to 9.0 or above.

Caustic Soda may be called by other names, Sodium Hydroxide, Lye.

HEALTH HAZARDS
Causes severe burns of eyes, skin, and mucous membranes. (USCG, 1999)

AIR AND WATER REACTIONS:
Slowly absorbs carbon dioxide from the air to give solid products as crusts or precipitates. Water soluble. Dilution with water liberates heat, possibly enough to cause local boiling and spattering.

CHEMICAL PROFILE:
CAUSTIC SODA, SOLUTION refers to an aqueous solution of sodium hydroxide. Strongly basic. Reacts rapidly and exothermically with organic and inorganic acids, with organic and inorganic acid anhydrides, including oxides of nonmetals such as sulfur dioxide, sulfur trioxide, phosphorus trioxide, phosphorus pentaoxide, and with organic and inorganic acid chlorides. May react explosively with maleic anhydride [MCA Case History 622 1960]. Attacks aluminum and zinc with evolution of hydrogen, a flammable gas. May initiate polymerization in polymerizable organic materials: a violent polymerization results if acetaldehyde contacts alkaline materials such as sodium hydroxide; an extremely violent polymerization results from contact of acrolein with alkaline materials such as sodium hydroxide [Chem. Safety Data Sheet SD-85 1961]. A violent explosion resulted when a quantity of pentol was accidentally brought in contact with a caustic cleaning solution chemically similar to aqueous sodium hydroxide [MCA Case History 363 1964]. Aqueous solutions of reducing sugars other than sucrose, when heated (above 84°C.), evolve toxic levels of carbon monoxide in the presence of alkalis or alkaline salts, such as sodium phosphate (also potassium hydroxide, sodium hydroxide, calcium hydroxide, etc.) [Bretherick 5th ed. 1995].

REACTIVE GROUPS:
Bases (Reactivity, 2001)

FIRST AID
Eye: If this chemical contacts the eyes, immediately flush the eyes with large amounts of water for at least 15 minutes, forcibly holding the lower and upper eyelids to ensure complete irrigation. GET MEDICAL ATTENTION IMMEDIATELY.

Skin: If this chemical contacts the skin, immediately flush the contaminated skin with water. If this chemical penetrates the clothing, immediately remove the clothing and flush Athe skin with water. Remove jewelry and shoes. GET MEDICAL ATTENTION IMMEDIATELY.

Breathing: If a person breathes large amounts of this chemical, move the exposed person to fresh air at once. If breathing has stopped, perform mouth-to-mouth resuscitation. Keep the affected person warm and at rest. GET MEDICAL ATTENTION IMMEDIATELY.

Swallow: If this chemical has been swallowed, GET MEDICAL ATTENTION IMMEDIATELY. Do not induce vomiting. Give large amounts of water. If vomiting occurs spontaneously, keep airway clear. Give more water when vomiting stops.

Personal Protective Equipment-

Skin: Wear appropriate personal protective clothing to prevent skin contact.
Eyes: Wear appropriate eye protection to prevent eye contact.
Wash skin: The worker should immediately wash the skin when it becomes contaminated.
Remove: Work clothing that becomes wet or significantly contaminated should be removed and replaced.
Change: Workers whose clothing may have become contaminated should change into uncontaminated clothing before leaving the work premise.
Provide: Eyewash, Quick drench (NIOSH, 1997)

MATERIAL RATINGS

NAT RUB+NEOP
GLOVES > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

CAUSTIC SODA

Sodium Hydroxide – Waste Water Treatment

TANK 46

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 25 to 50 meters for "Hot Zone" (Guide 154 – DOT/ERG)

Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or **S**elf **C**ontained **B**reathing **A**pparatus

* items not needed if wearing full face respirator.

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately remove all contaminated clothing as soon as possible.

3. Keep material out of water sources and sewers, two (2) sewers are located directly outside east wall. Build dikes to contain or direct flow as necessary.
   USE SPILL BLOCKER TO COVER NEAREST SEWERS

4. Apply water spray or mist to cool a container. Water will create heat if applied directly to Caustic.

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks. Sawdust is also acceptable for soaking up material.
   DO NOT ATTEMPT TO NEUTRALIZE WITHOUT A GOOD KNOWLEDGE OF REACTION. DISPOSE OF MATERIAL IN SUITABLE CONTAINERS. Notify Environmental Manager.
   Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

Take off all contaminated clothing immediately. Rinse immediately with plenty of water and seek medical advice.

Eye: If this chemical contacts the eyes, immediately flush the eyes with large amounts of water for at least 15 minutes, forcibly holding the lower and upper eyelids to ensure complete irrigation. GET MEDICAL ATTENTION IMMEDIATELY.

Skin: If this chemical contacts the skin, immediately flush the contaminated skin with water. If this chemical penetrates the clothing, immediately remove the clothing and flush the skin with water. Remove jewelry and shoes. GET MEDICAL ATTENTION IMMEDIATELY.

Inhalation: If a person breathes large amounts of this chemical, move the exposed person to fresh air at once. If breathing has stopped, perform mouth-to-mouth resuscitation. Keep the affected person warm and at rest. GET MEDICAL ATTENTION IMMEDIATELY.

Ingestion: If this chemical has been swallowed, GET MEDICAL ATTENTION IMMEDIATELY. Do not induce vomiting. Give large amounts of water. If vomiting occurs spontaneously, keep airway clear. Give more water when vomiting stops.

Note to Physician: This product contains sodium hydroxide.

DOUBLE EAGLE
STEEL COATING COMPANY

CITRIC ACID
Chemical Building

CITRIC ACID is white, odorless crystals with an acid taste. Denser that water (USGC-1999). It is stored in 50-pound brown bags and white 500-pound bags and dumped into underground tank in chemical building. It is used in our plating solution. Excess 500# bags are stored on Coil Storage Building at the south end.

HEALTH HAZARDS
May cause irritation to eyes, skin, and respiratory system. Citric acid ingested or inhaled may cause nausea, vomiting and diarrhea. Citric acid decreases iron and calcium absorption.

AIR AND WATER REACTIONS:
The pure material is moisture sensitive (undergoes slow hydrolysis). Water-soluble

CHEMICAL PROFILE:
Citric Acid reacts with oxidizing agents, bases reducing agents and metal nitrates (NTP, 1992)
Reactions with metal nitrates are potentially explosive. Heating to the point of decomposition causes emission of acrid smoke and fumes.

Citric Acid is stable at room temperature in closed containers under normal storage and handling conditions. This crystalline material will evaporate the moisture in lungs when inhaled.

FIRST AID

Eye: First check the victim for contact lenses and remove if present. Flush victim's eyes with water or normal saline solution for 20 to 30 minutes while simultaneously calling a hospital or poison control center. Do not put any ointments, oils or medication in the victim's eyes without specific instructions from a physician. If symptoms (such as redness or irritation) develop, immediately transport to a hospital.

Skin: Immediately flush skin with plenty of soap and water for at least 15 minutes while removing contaminated clothing and shoes. Get medical aid if irritation develops or persists.

Breathing: Remove from exposure to fresh air immediately. Breath fresh air deeply. If breathing is difficult give oxygen. If necessary, give artificial respiration and seek medical attention.

Ingestion: If the victim is conscious and alert, give 2 to 4 cupfuls of milk or water. Never give anything by mouth to an unconscious or convulsing person. Get medical attention immediately.

Personal Protective Equipment-

Dust Mask, Splash goggles or full face shield, Safety Glasses, Protective Gloves.

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

CITRIC ACID
Chemical Building

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Personal Protective Equipment: Tyvek Suit
Hard Hat
Safety Glasses
Splash Goggles
Rubber Boots
Rubber Gloves
P-95 Dust Mask

Highlighted items in Spill Response Boxes

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE on before you enter the contaminated area to assist that person. The material is an irritant to skin and lungs.

3. Keep material out of water sources and sewers. This solid granular material should be kept dry when possible to eliminate water run-off. Build dikes to contain flow as necessary.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

4. Sweep or scoop bulk crystals into plastic container and contact Environmental Manager for proper disposal. Storage of collected materials should go to Door 15.

FIRST AID

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower lids. Get medical aid immediately.

Skin: Immediately flush skin with plenty of soap and water for at least 15 minutes while removing contaminated clothing and shoes. Get medical aid if irritation develops or persists.

Inhalation: Remove from exposure to fresh air immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical aid of cough or other symptoms appear.

Ingestion: If the victim is conscious and alert, give 2 to 4 cupfuls of milk or water. Never give anything by mouth to an unconscious or convulsing person. Get medical attention immediately.

DOUBLE EAGLE
STEEL COATING COMPANY

Ferrous chloride
Tank 4
INSIDE DIKE

Ferrous chloride, solution is the greenish-white crystalline solid dissolved in water. It is corrosive to metals and tissue. It is used in our plating solution. Tank 4 has a capacity of 20,000 gallons

AIR AND WATER REACTIONS:
Water-soluble

CHEMICAL PROFILE:
Inorganic reducing agents, such as FERROUS CHLORIDE, react with oxidizing agents to generate heat and products that may be flammable, combustible, or otherwise reactive. Their reactions with oxidizing agents may be violent.

FIRST AID

Eye: If this chemical contacts the eyes, immediately wash the eyes with large amounts of water, occasionally lifting the lower and upper lids. Get medical attention immediately. Contact lenses should not be worn when working with this chemical.

Skin: If this chemical contacts the skin, wash the contaminated skin with soap and water.

Breathing: If a person breathes large amounts of this chemical, move the exposed person to fresh air at once. If breathing has stopped, perform mouth-to-mouth resuscitation. Keep the affected person warm and at rest. Get medical attention as soon as possible.

Swallow: If this chemical has been swallowed, gets medical attention immediately. (NIOSH, 1997)

Keep material out of water sources and sewers. Build dikes to contain flow as necessary. Neutralize spilled material with crushed limestone, soda ash, or lime. Apply water spray or mist to knock down vapors. Land spill: Dig a pit, pond, lagoon, holding area to contain liquid or solid material Dike surface flow using soil, sand bags, foamed polyurethane, or foamed concrete. Absorb bulk liquid with fly ash, cement powder, or commercial sorbents. Neutralize with agricultural lime (CaO), crushed limestone ($CaCO_3$) or sodium bicarbonate ($NaHCO_3$). Water spill: Neutralize with agricultural lime (CaO) crushed limestone ($CaCO_3$), or sodium bicarbonate ($NaHCO_3$). Use mechanical dredges or lifts to remove immobilized masses of pollutants and precipitates. Adjust pH to neutral (pH=7). (© AAR, 1999)

Skin: Wear appropriate personal protective clothing to prevent skin contact.
Eyes: Wear appropriate eye protection to prevent eye contact.

Wash skin: The worker should wash daily at the end of each work shift.
Remove: No recommendation is made specifying the need for removing clothing that becomes wet or contaminated.
Change: Workers whose clothing may have become contaminated should change into uncontaminated clothing before leaving the work premise. (NIOSH, 1997)

MATERIAL RATINGS

BARRICADE	> 3 hrs[limited data]
BUTYL	> 3 hrs[limited data]
NAT RUB	> 3 hours
NAT RUB+NEOP	> 3 hours
NAT RUB+NEOP+NBR	> 3 hours
NEOP	> 3 hours
NEOP/BUTYL	> 3 hrs[limited data]
NEOP/NAT RUB	> 3 hours
NITRILE	> 3 hours
NITRILE+PVC	> 3 hrs[limited data]
PE	> 3 hrs[limited data]
PE/EVAL/PE	> 3 hours
PTFE TEFLON	> 3 hrs[limited data]
PVC	> 3 hrs[limited data]
RESPONDER	> 3 hours
SARANEX23P	> 3 hrs[limited data]

These protective clothing recommendations are based on experimental data for another chemical with similar chemical properties and structure. Because material recommendations for chemicals in the same classification will generally, but not always, be appropriate, use caution when following these recommendations.
(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

Ferrous chloride
Tank 4 - INSIDE DIKE

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 154 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items in	Safety Glasses
Spill Response Boxes	Splash Goggles
	Rubber Boots
	Rubber Gloves

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE on before you enter the contaminated area to assist that person.

3. Keep material out of water sources and sewers. Build dikes to contain or redirect flow as necessary. Consider first blocking diversion away from sewer, closer to spill.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

4. Apply water spray or mist to knock down vapors, if vapors are present.
   USE FIRE HOSE LOCATED INSIDE CHEMICAL BUILDING. 200 FEET WILL NOT REACH AREA, NEED TO ADD HOSE.

5. Absorb bulk liquid with commercial absorbents and Pink Mats or Socks. Neutralize using lime slurry or AMPHO-MAG from Wastewater Treatment.
   USE LIME SLURRY FROM WASTE WATER LIME SILO AREA. DRY LIME MAY ALSO BE USED TO COVER TOP OF MATERIAL.
   Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

In every case of overexposure seek medical attention. Move victim to fresh air

Skin: Remove contaminated clothing. Wash the affected areas with soap and water. If irritation persists, seek medical attention.

Eye: Flush immediately with water for 15 minutes. Seek immediate medical attention.

Inhalation: Move to fresh air. Administer oxygen or artificial respirations if required.

Ingestion: If conscious, give two (2) glasses of water. DO NOT INDUCE VOMITING. Do not give anything by mouth to an unconscious person. Seek immediate medical attention.

DOUBLE EAGLE
STEEL COATING COMPANY

HYDRATED LIME
Silo Outside
Waste Water Treatment

HYDRATED LIME is a white, odorless powdery substance stored in the 100-ton silo on the East Side of Waste Water Treatment. It is used in the treatment process.

Lime is delivered in a bulk transport vehicle and pumped into the silo.

Lime reacts with strong acids that produce heat and possible explosion in confined spaces.

HEALTH HAZARDS
May cause irritation to eyes, skin, and respiratory system.

AIR AND WATER REACTIONS:
Avoid contact with strong acids. It is slightly soluble in water.

CHEMICAL PROFILE:
Lime is a Non-Toxic material used in the treatment of our waste water. It reacts with water; acids; reactive fluoridated, brominated or phosphorous compounds; reactive powdered metals; organic acid anydrides; nitro-organic compounds; interhalogenated compounds. Lime is considered stable and not very slouble in water. Reactive with acids to form calcium salts while generating heat.

FIRST AID

Eye: If this chemical contacts the eyes, immediately wash the eyes with large amounts of lukewarm water for at least 15 minutes, lifting the lower and upper lids. Get medical attention immediately.

Skin: If this chemical contacts the skin, rinse exposed areas thoroughly flowing water, while removing contaminated clothing and shoes. Get medical attention if irritation persists.

Breathing: Breath fresh air deeply. If necessary, give artificial respiration and seek medical attention.

Swallow: If this chemical has been swallowed, drink water followed by diluted vinegar or fruit juice to neutralize. Never give anything by mouth to an unconscious or convulsing person. Get medical attention immediately. Do not induce vomiting

Personal Protective Equipment-

Skin: Wear appropriate personal protective clothing to prevent skin contact. Long sleeves. Trousers covering the top of boots. Clean dry gloves.

Eyes: Wear appropriate eye protection to prevent eye contact. Splash goggles

Respiratory: Use a mask in unventilated and dusty areas.

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

HYDRATED LIME
Silo Outside
Waste Water Treatment

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items in	Safety Glasses*
Spill Response Boxes	Splash Goggles
	Rubber Boots
	Rubber Gloves
	P-95 Dust Mask

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Avoid skin, eye, or breathing contact. Consider potential for IDLH before donning a respirator. Consider your own safety first. If a person needs medical assistance, put your PPE on before you enter the contaminated area to assist that person. The material is an irritant to skin and lungs.

3. Large spill of the dry powder should be cleaned using an industrial vacuum. Do not flush into sewer with water.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

4. Small spills can be swept or scooped into plastic container and contact Environmental Manager for proper disposal. Storage of collected materials should go to Door 15.

FIRST AID

Eyes: Turn up the eyelids and wash immediately and abundantly with lukewarm water for at least 15 minutes. DO NOT try to neutralize. Get medical attention immediately.

Skin: Remove contaminated clothing and rinse area with plenty of water.

Inhalation: Breath fresh air deeply. If necessary, give artificial respiration and seek medical attention.

Ingestion: Drink water followed by diluted vinegar (1 part vinegar in 2 parts water) or fruit juice to neutralize. DO NOT induce vomiting. Get medical attention immediately.

DOUBLE EAGLE
STEEL COATING COMPANY

HYDROCHLORIC ACID
TANK 8 and TANK 9

Tanks 8 & 9 are located outside the west side of the plant inside the dike on the West Road. Tanks are filled from a truck pumping into a flange at the edge of the tanks. Each tank has a capacity of 15,000 gallons.

Hydrochloric acid is a colorless to yellow aqueous liquid with a pungent odor. A 31 - 36.5% solution of hydrogen chloride (a gas). Density 10.1 lb. / gal. Fumes irritate the eyes and mucous membranes. Very corrosive to metals and tissue. Used for cleaning masonry and metals, manufacturing chemicals, in petroleum production (© AAR, 1999).

Hydrochloric acid is used in the plating solution.

HEALTH HAZARDS
TOXIC; inhalation, ingestion or contact (skin, eyes) with vapors, dusts or substance may cause severe injury, burns, or death. Reaction with water or moist air will release toxic, corrosive or flammable gases. Reaction with water may generate much heat, which will increase the concentration of fumes in the air. Fire will produce irritating, corrosive and/or toxic gases. Runoff from fire control or dilution water may be corrosive and/or toxic and cause pollution. (DOT, 2000) USCG, 1999)

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
HYDROCHLORIC ACID, SOLUTION is an aqueous solution of hydrogen chloride, an acidic gas, Reacts exothermically with organic bases (amines, amides) and inorganic bases (oxides and hydroxides of metals). Reacts exothermically with carbonates (including limestone and building materials containing limestone) and hydrogen carbonates to generate carbon dioxide. Reacts with sulfides, carbides, borides, and phosphides to generate toxic or flammable gases. Reacts with many metals (including aluminum, zinc, calcium, magnesium, iron, tin and all of the alkali metals) to generate flammable hydrogen gas. Reacts violently with acetic anhydride, 2-aminoethanol, ammonium hydroxide, calcium phosphide, chlorosulfonic acid, 1,1-difluoroethylene, ethylenediamine, ethyleneimine, oleum, perchloric acid, b-propiolactone, propylene oxide, silver perchlorate/carbon tetrachloride mixture, sodium hydroxide, uranium(IV) phosphide, vinyl acetate, calcium carbide, rubidium carbide, cesium acetylide, rubidium acetylide, magnesium boride, mercury(II) sulfate [Lewis]. Mixtures with concentrated sulfuric acid can evolve toxic hydrogen chloride gas at a dangerous rate. Undergoes a very energetic reaction with calcium phosphide [Mellor 8:841(1946-1947)].

REACTIVE GROUPS:
Acids, Inorganic Non-oxidizing (Reactivity, 2001)
Move victim to fresh air. Call 911 or emergency medical service. Apply artificial respiration if victim is not breathing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult. Remove and isolate contaminated clothing and shoes. In case of contact with substance, immediately flush skin or eyes with running water for at least 30 minutes. For minor skin contact, avoid spreading material on unaffected skin. Keep victim warm and quiet. Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. (DOT, 2000)

Avoid breathing vapors. Keep upwind. Avoid bodily contact with the material. Wear appropriate chemical protective gloves, boots and goggles. Do not handle broken packages unless wearing appropriate personal protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water. If contact with the material anticipated, wear appropriate chemical protective clothing. (© AAR, 1999)

Personal Protective Equipment-

Full Face Piece Air Purifying Respirator
Chemical Splash Goggles
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

MATERIAL RATINGS

NAT RUB
GLOVES > 3 hours

NEOP
GLOVES > 3 hours

NITRILE
GLOVES > 3 hours

NITRILE+PVC
FABRIC > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

PVC
FABRIC > 3 hours
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

HYDROCHLORIC ACID
TANK 8 and TANK 9

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 157 – DOT/ERG)

Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or Self Contained Breathing Apparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

4. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks.
   NEUTRALIZE WITH LIME SLURRY(Available at WWT, near Door 14).
   DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager.

Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn. Move victim to fresh air. If the victim has difficult breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Eye: Immediately flush eyes with large amounts of water for at least 15 minutes, by the clock, while holding eyelids open. Transport to the nearest medical facility for additional treatment.

Skin: Remove contaminated clothing. Immediately flush with large amounts of water for at least 15 minutes, by the clock, and follow by washing with soap if available. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with water, then drink sips of water to remove taste from mouth. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. Transport to nearest medical facility for additional treatment.

DOUBLE EAGLE
STEEL COATING COMPANY

Pickle Recirculating Tank
TANK 10

Hydrochloric Acid, Residuals from Strip, Clear liquid

Tank 10 is located inside the plant on the 5th floor, inside a dike on the North End of the floor. Tank is filled by gravity feed from Day Tank located on exterior of Sixth Floor. Manual valves are operated to fill tank and product is mixed with water to produce desired percentage.

Hydrochloric acid is a colorless to yellow aqueous liquid with a pungent odor. This tank contains variable amounts (6% to 16%) of hydrochloric acid and (94% to 84%)water. Fumes irritate the eyes and mucous membranes. Gases and liquid are very corrosive to metals and tissue.

Hydrochloric acid is used in the plating process at the Pickle Rinse tank on Sixth Floor.

HEALTH HAZARDS
TOXIC; inhalation, ingestion or contact (skin, eyes) with vapors, dusts or substance may cause severe injury, burns, or death. Reaction with water or moist air will release toxic, corrosive or flammable gases. Reaction with water may generate much heat, which will increase the concentration of fumes in the air. Fire will produce irritating, corrosive and/or toxic gases. Runoff from fire control or dilution water may be corrosive and/or toxic and cause pollution. (DOT, 2000) USCG, 1999)

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
HYDROCHLORIC ACID, SOLUTION is an aqueous solution of hydrogen chloride, an acidic gas, Reacts exothermically with organic bases (amines, amides) and inorganic bases (oxides and hydroxides of metals). Reacts exothermically with carbonates (including limestone and building materials containing limestone) and hydrogen carbonates to generate carbon dioxide. Reacts with sulfides, carbides, borides, and phosphides to generate toxic or flammable gases. Reacts with many metals (including aluminum, zinc, calcium, magnesium, iron, tin and all of the alkali metals) to generate flammable hydrogen gas. Reacts violently with acetic anhydride, 2-aminoethanol, ammonium hydroxide, calcium phosphide, chlorosulfonic acid, 1,1-difluoroethylene, ethylenediamine, ethyleneimine, oleum, perchloric acid, b-propiolactone, propylene oxide, silver perchlorate/carbon tetrachloride mixture, sodium hydroxide, uranium(IV) phosphide, vinyl acetate, calcium carbide, rubidium carbide, cesium acetylide, rubidium acetylide, magnesium boride, mercury(II) sulfate [Lewis]. Mixtures with concentrated sulfuric acid can evolve toxic hydrogen chloride gas at a dangerous rate. Undergoes a very energetic reaction with calcium phosphide [Mellor 8:841(1946-1947)].

REACTIVE GROUPS:
Acids, Inorganic Non-oxidizing (Reactivity, 2001)

First Aid

Move victim to fresh air. Call 911 or emergency medical service. Apply artificial respiration if victim is not breathing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult. Remove and isolate contaminated clothing and shoes. In case of contact with substance, immediately flush skin or eyes with running water for at least 15 minutes. For minor skin contact, avoid spreading material on unaffected skin. Keep victim warm and quiet. Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. (DOT, 2000)

Avoid breathing vapors. Keep upwind. Avoid bodily contact with the material. Wear appropriate chemical protective gloves, boots and goggles. Do not handle broken packages unless wearing appropriate personal protective equipment. Wash away any material that may have contacted the body with copious amounts of water or soap and water. If contact with the material anticipated, wear appropriate chemical protective clothing. (© AAR, 1999)

Personal Protective Equipment-

Full Face Piece Air Purifying Respirator
Chemical Splash Goggles
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

MATERIAL RATINGS

NAT RUB
GLOVES > 3 hours
NEOP
GLOVES > 3 hours
NITRILE
GLOVES > 3 hours
NITRILE+PVC
FABRIC > 3 hours
PE/EVAL/PE
GLOVES > 3 hours
PVC
FABRIC > 3 hours
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

HYDROCHLORIC ACID (6% to 16%)
TANK 10

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 157 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or **S**elf **C**ontained **B**reathing **A**pparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel. Consider 1st floor area.
2. Contact Main Gate with information regarding type of emergency and assistance is needed.
3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.
4. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel. Drains to Chemical Building may be the best solution. Solution is fed from Day Tank on exterior of 6th floor. Locate valves and close. Close doors to Rectifier Rooms.
5. Attempt to keep spill on the Fifth Floor. Fluid that makes the stairway or curb may injure someone below. If acid is already on first floor, block area from workers walking through acid.

   USE SPILL BLOCKER TO COVER NEAREST SEWER
6. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks.

   NEUTRALIZE WITH LIME SLURRY (Available at WWT, near Door 14).

   DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager.

Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn

Eye: Immediately flush eyes with large amounts of water for at least 15 minutes, by the clock, while holding eyelids open. Transport to the nearest medical facility for additional treatment.

Skin: Remove contaminated clothing. Immediately flush with large amounts of water for at least 15 minutes, by the clock, and follow by washing with soap if available. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with water, then drink sips of water to remove taste from mouth. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. Transport to nearest medical facility for additional treatment.

Inhalation: Move victim to fresh air. If the victim has difficult breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

DOUBLE EAGLE
STEEL COATING COMPANY

Potassium Chloride
KCl
Silo Outside
Chemical Building

Potassium Chloride is white colorless cubic crystals. Strong saline taste (NTP, 1992). It is used in our plating solution.

HEALTH HAZARDS
Avoid contact with eyes, skin and clothing. Wash thoroughly after handling. Potassium chloride is generally recognized as safe when used in accordance with good manufacturing practice.

AIR AND WATER REACTIONS:
Hygroscopic (readily taking up and absorbing moisture [Websters; tenth edition]). Water-soluble.

REACTIVE GROUPS:
Inorganic Compounds/Neither Reducing nor Oxidizing (Reactivity, 2001)
KCl is incompatible with hot nitric acid, Bromine trifloride, potassium permanganate mixture, most noble metals, dichloromaleic anhydride and urea.

CHEMICAL PROFILE:
POTASSIUM CHLORIDE is not in general strongly reactive. Violent reaction with BrF3 and with a mixture of sulfuric acid potassium permanganate mixture [NTP, 1992]. Reacts with concentrated sulfuric acid to generate fumes of hydrogen chloride.

FIRST AID

Eye: If irritation or redness develops, move victim away from exposure and into fresh air. Flush eyes with clean water. If symptoms persist, seek medical attention.

Skin: Cleanse affected area(s) thoroughly by washing with mild soap and water. If irritation or redness develops and persists, seek medical attention.

Breathing: If respiratory symptoms develop, move victim away source of exposure and into fresh air. If symptoms persist, seek medical attention. If victim is not breathing, clear airway and immediately begin artificial respiration. If breathing difficulties develop, Only qualified personnel should administer oxygen. Seek immediate medical attention.

Ingestion: If large amounts are swallowed seek medical attention. If victim is drowsy or unconscious and vomiting, place on left side with the head down and do not give anything by mouth. If victim is conscious and alert and ingestion occurred with the last hour, vomiting should be induced for ingestion of large amounts (more than 5 (five) ounces or a little more than ½ cup in an adult) preferably under direction from a physician or poison center. If possible, do not leave victim unattended and observe closely for adequate breathing.

Personal Protective Equipment-

P-95 respirator, Cloth or leather work gloves, long sleeves, safety glasses, possibly face shield.

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

Potassium Chloride
KCl
Chemical Building

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Personal Protective Equipment:	Tyvek Suit
	Hard Hat
Highlighted items in	Safety Glasses
Spill Response Boxes	Splash Goggles
	Rubber Boots
	Rubber Gloves
	P-95 Dust Mask

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE on before you enter the contaminated area to assist that person. The material is an irritant to skin and lungs.

3. Keep material out of water sources and sewers. This solid granular material should be kept dry when possible to eliminate water run-off. Build dikes to contain flow as necessary.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

4. Sweep or scoop bulk crystals into plastic container and contact Environmental Manager for proper disposal. Storage of collected materials should go to Door 15.

FIRST AID

Eye: If irritation or redness develops, move victim away from exposure and into fresh air. Flush eyes with clean water. If symptoms persist, seek medical attention.

Skin: Cleanse affected area(s) thoroughly by washing with mild soap and water. If irritation or redness develops and persists, seek medical attention.

Breathing: If respiratory symptoms develop, move victim away source of exposure and into fresh air. If symptoms persist, seek medical attention. If victim is not breathing, clear airway and immediately begin artificial respiration. If breathing difficulties develop, Only qualified personnel should administer oxygen. Seek immediate medical attention.

Ingestion: If large amounts are swallowed seek medical attention. If victim is drowsy or unconscious and vomiting, place on left side with the head down and do not give anything by mouth. If victim is conscious and alert and ingestion occurred with the last hour, vomiting should be induced for ingestion of large amounts (more than 5 (five) ounces or a little more than ½ cup in an adult) preferably under direction from a physician or poison center. If possible, do not leave victim unattended and observe closely for adequate breathing.

DOUBLE EAGLE
STEEL COATING COMPANY

SULFURIC ACID
Waste Water Treatment
TANK 45

Tank is located inside the Waste Water Treatment building North end, inside a dike. Capacity of tank is 5000 gallons. Tank is filled from a truck pumping into a flange at the West side of the building.

Sulfuric acid is a clear to amber colored, heavy oily liquid; a pungent odor may exist if certain impurities are present. Extremely Corrosive. Causes severe burn and eye damage. Reacts violently with water. Will react with many organic materials and may cause fire due to heat of the reaction. Sulfuric acid is not flammable, but reacts with most metals to form explosive / flammable hydrogen gas. Density 15 lb / gal

Sulfuric acid is used in the neutralization of water.

HEALTH HAZARDS
Corrosive to all body tissues. Inhalation of vapor may cause serious lung damage. Contact with eyes may result in total loss of vision. Skin contact may produce severe necrosis. Fatal amount for adult: between 1 teaspoonful and one-half ounce of the concentrated chemical. Even a few drops may be fatal if the acid gains access to the trachea. Chronic exposure may cause tracheobronchitis, stomatitis, conjunctivitis, and gastritis. Gastric perforation and peritonitis may occur and may be followed by circulatory collapse. Circulatory shock is often the immediate cause of death. Those with chronic respiratory, gastrointestinal, or nervous diseases and any eye and skin diseases are at greater risk. (EPA, 1998)

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
SULFURIC ACID is strongly acidic. Reacts violently with bromine pentafluoride Mellor 2 Supp. 1:172 1956]. Exploded with para-nitrotoluene at 80 °C [Chem. Eng. News 27:2504]. An explosion occurred when concentrated sulfuric acid was mixed with crystalline potassium permanganate in a vessel containing moisture. Manganese heptoxide was formed, which explodes at 70°C [Delhez 1967]. A mixture of acrylonitrile with concentrated sulfuric acid must be kept well chilled, otherwise a vigorous exothermic reaction occurs [Chem. Safety Data Sheet SD-31:8. 1949]. Mixing sulfuric acid (96%) in equal portions with any of the following substances in a closed container caused the temperature and pressure to increase: acetonitrile, acrolein, 2-aminoethanol, ammonium hydroxide (28%), aniline, n-butyraldehyde, chlorosulfonic acid, ethylene diamine, ethyleneimine, epichlorohydrin, ethylene cyanohydrin, hydrochloric acid (36%), hydrofluoric acid (48.7%), propiolactone, propylene oxide, sodium hydroxide, styrene monomer [NFPA 1991]. Sulfuric acid (concentrated) is extremely hazardous in contact with carbides, bromates, chlorates, fulminates, picrates, and powdered metals [Haz. Chem. Data 1966]. Allyl chloride may polymerize violently under conditions

involving an acid catalyst, such as sulfuric acid [Ventrone 1971]. React exothermically with sodium hypochlorite to produce chlorine gas.

REACTIVE GROUPS:

Acids, Inorganic Oxidizing (Reactivity, 2001)

Reactive Hazards

Strong Oxidizing Agent, Water-Reactive

Personal Protective Equipment-

Full Face Piece Air Purifying Respirator
Chemical Splash Goggles
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

MATERIAL RATINGS

AL PET/PVC
FABRIC > 3 hours
BUTYL
FABRIC > 3 hours
BUTYL/NEOP
FABRIC > 3 hours
CHEMREL
FABRIC > 3 hours
CPE
FABRIC > 3 hours
GLOVES > 3 hours
NAT RUB
GLOVES 1-3 hours
NEOP
FABRIC 1-3 hours
GLOVES > 3 hours
BOOTS > 3 hours
NEOP/BUTYL
GLOVES > 3 hours
NEOP+PVC
FABRIC 1-3 hours
NITRILE
GLOVES > 3 hours
NITRILE+PVC
FABRIC < 1 hour
GLOVES > 3 hours
PE
FABRIC > 3 hours
PTFE TEFLON
FABRIC > 3 hours
PVC
FABRIC < 1 hour
GLOVES 1-3 hours
SARANEX23P
FABRIC > 3 hours
VITON
FABRIC > 3 hours
VITON/CHLOROBUTYL
FABRIC > 3 hours
VITON/NEOP
FABRIC > 3 hours
(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

SULFURIC ACID
TANK 45

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 137 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or **S**elf **C**ontained **B**reathing **A**pparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible. EXPOSURE CAUSES CANCER.

4. Keep material out of water sources and sewers. Keep the acid inside the building if possible. This chemical reacts violently with water!

   Build dikes to contain flow as necessary. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel. Do Not allow persons to enter without proper protection. Consider first blocking diversion away from sewer, closer to spill.

   USE SPILL BLOCKER TO COVER NEAREST SEWER

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks.

   ONLY KNOWLEDGEABLE PERSONNEL SHOULD ATTEMPT TO NEUTRALIZE . IN PLACE NEUTRALIZATION IS RECOMMEDED. DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager.

   Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn.

Corrosive effects on the skin and ayes may be delayed, and damage may occur without the sensation or onset of pain. Strict adherence to first aid measures following any exposure is essential. SPEED IS ESSENTIAL. OBTAIN IMMEDIATE MEDICAL ATTENTION.

Eye: Immediately flush eyes with running water for at least 20 minutes, while holding eyelids open. If irritation persists, repeat flushing. Obtain medical attention immediately. DO NOT Transport victim until the recommended flushing period is completed unless flushing can be continued during transport.

Skin: Immediately flush skin with running water for a minimum of 20 minutes. Start flushing while removing contaminated clothing. If irritation persists, repeat flushing. If irritation persists, repeat flushing. Obtain medical attention immediately. DO NOT Transport victim until the recommended flushing period is completed unless flushing can be continued during transport.

Inhalation: Move victim to fresh air. Give artificial respiration ONLY if breathing has stopped. Do not use mouth-to-mouth method if victim ingested or inhaled the substance: Induce artificial respiration only with the aid of a pocket mask equipped with a one-way valve or other proper respiratory device.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with ½ to 1 glass of water to dilute material. If spontaneous vomiting occurs, have victim lean forward with head down to avoid breathing in of vomitus, Rinse mouth and administer more water. IMMEDIATELY contact local poison control center. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. IMMEDIATELY Transport to nearest medical facility for additional treatment.

DOUBLE EAGLE
STEEL COATING COMPANY

USS-P
MIXTURE
CHEMICAL BUILDING

USS-P is shipped and stored on site in 330-gallon metal containers. Most containers are stored and used in the chemical building. The mixture is pumped into the Alloy Solution.

USS-P is a clear to pale yellow liquid with a musty odor. It is a surfactant that is used in the plating solution. Contact may irritate skin, eyes, and mucous membranes.

USS-P is a proprietary chemical that is completely soluble in water.

HEALTH HAZARDS
May cause irritation to eyes, skin, and respiratory system.

AIR AND WATER REACTIONS:
Avoid contact with strong oxidizers. Water soluble.

CHEMICAL PROFILE:
USS-P is a surfactant that provides for smoother coating finishes. Materials to avoid are strong oxidizers (MSDS - 2004)

FIRST AID

Eye: If this chemical contacts the eyes, immediately wash the eyes with large amounts of water, occasionally lifting the lower and upper lids. Get medical attention if irritation persists.

Skin: If this chemical contacts the skin, wash exposed areas thoroughly with soap and flowing water, while removing contaminated clothing and shoes. Get medical attention if irritation persists.

Breathing: Remove the exposed person from source of exposure. If breathing is difficult, only certified persons may administer oxygen.. If breathing has stopped, perform mouth-to-mouth resuscitation. Get medical attention as soon as possible.

Swallow: If this chemical has been swallowed, give 1 or 2 glasses of water or milk. Never give anything by mouth to an unconscious or convulsing person. DO NOT Induce Vomiting unless directed by a physician. Get medical attention immediately. Do not induce vomiting

Personal Protective Equipment-

Skin: Wear appropriate personal protective clothing to prevent skin contact.
Eyes: Wear appropriate eye protection to prevent eye contact.
Wash skin: The worker should immediately wash the skin when it becomes contaminated.
Remove: Work clothing that becomes wet or significantly contaminated should be removed and replaced.

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

USS-P
MIXTURE
CHEMICAL BUILDING

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses
in Spill Response Boxes	Splash Goggles
	Rubber Boots
	Rubber Gloves

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, if necessary, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

3. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. Nearest sewer outside may be under a car parked at administration.

   USE SPILL BLOCKER TO COVER NEAREST SEWER

4. Absorb bulk liquid with commercial sorbents and Blue Mats or Socks. Sawdust is also acceptable for soaking up material. Transfer absorbed material to a suitable container for evaluation. Notify Environmental Manager.

FIRST AID

Eyes: Immediately flush eyes with flowing water for at least 15 minutes, while holding eyelids away from eyes. Seek medical attention if irritation persists.

Skin: Wash exposed areas thoroughly with soap and flowing water, while removing contaminated clothing and shoes. Get medical attention if irritation persists.

Inhalation: Remove the exposed person from source of exposure. If breathing is difficult, only certified persons may administer oxygen. If breathing has stopped, perform mouth-to-mouth resuscitation. Get medical attention as soon as possible.

Ingestion: Give 1 or 2 glasses of water or milk. Never give anything by mouth to an unconscious or convulsing person. DO NOT induce vomiting unless directed by a physician. Get medical attention immediately.

DOUBLE EAGLE
STEEL COATING COMPANY

USSPXP 9010

GRAIN REFINER
TANK 5

USS-PXP 9010 stored on site in the bulk storage tank in the tank farm on West Road and located inside the dike. The mixture is pumped into the Zinc Solution.

USS-PXP 9010 is anAmber to Brown liquid, weak Boric Acid solution. It is a surfactant that is used in the plating solution. Contact may irritate skin, eyes, and mucous membranes.

USS-PXP 9010 is a proprietary chemical that is completely soluble in water.

HEALTH HAZARDS
May cause irritation to eyes, skin, and respiratory system.

AIR AND WATER REACTIONS:
Avoid contact with strong oxidizers. Water soluble.

CHEMICAL PROFILE:
USS-PXP 9010 is a surfactant that provides for smoother coating finishes. Materials to avoid are strong oxidizers (MSDS – 10-May 2005)

FIRST AID

Eye: If this chemical contacts the eyes, immediately wash the eyes with large amounts of water, occasionally lifting the lower and upper lids. Get medical attention if irritation persists.

Skin: If this chemical contacts the skin, wash exposed areas thoroughly with soap and flowing water, while removing contaminated clothing and shoes. Get medical attention if irritation persists.

Breathing: Remove the exposed person to fresh air. If breathing is difficult, only certified persons may administer oxygen. If breathing has stopped, perform mouth-to-mouth resuscitation. Get medical attention as soon as possible.

Swallow: If this chemical has been swallowed, give 1 or 2 glasses of water or milk. Never give anything by mouth to an unconscious or convulsing person. DO NOT Induce Vomiting unless directed by a physician. Get medical attention immediately.

Personal Protective Equipment-

Skin: Wear appropriate personal protective clothing to prevent skin contact. Long sleeve clothing, gloves, chemical resistant apron and work boots.

Eyes: Chemical Splash Goggles and face shield.

Wash skin: The worker should immediately wash the skin when it becomes contaminated.

Remove: Work clothing that becomes wet or significantly contaminated should be removed washed prior to reuse.

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

USS-PXP 9010
MIXTURE
TANK 1

Two Basic Goals of Emergency Response:

1. To protect the life and well being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses
in Spill Response Boxes	Splash Goggles
	Face Shield
	Rubber Boots
	Rubber Gloves

1. Contact Main Gate with information regarding type of emergency and assistance is needed.

2. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, if necessary, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

3. Keep material out of water sources and sewers. Contain material inside dike where it is located.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

4. Absorb bulk liquid with commercial sorbents and Blue Mats or Socks. Sawdust is also acceptable for soaking up material. Transfer absorbed material to a suitable container for evaluation. Notify Environmental Manager.

FIRST AID

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes forcibly holding eyelids apart to ensure complete irrigation of all eye and lid tissue. Get immediate medical attention.

Skin: Immediately flush skin with plenty of water while removing contaminated clothing and shoes. Get immediate medical attention. Contaminated clothing should be taken off and removed in a manner, which limits further exposure.

Inhalation: Remove the exposed person to fresh air. If breathing is difficult, only certified persons may administer oxygen. If breathing has stopped, perform mouth-to-mouth resuscitation. Get immediate medical attention.

Ingestion: If this chemical has been swallowed, DO NOT induce vomiting. Give 1 or 2 glasses of water or milk. Never give anything by mouth to an unconscious or convulsing person. Get medical attention immediately.

FIRST AID

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes forcibly holding eyelids apart to ensure complete irrigation of all eye and lid tissue. Get immediate medical attention.

Skin: Immediately flush skin with plenty of water while removing contaminated clothing and shoes. Get immediate medical attention. Contaminated clothing should be taken off and removed in a manner, which limits further exposure.

Inhalation: Remove the exposed person to fresh air. If breathing is difficult, only certified persons may administer oxygen. If breathing has stopped, perform mouth-to-mouth resuscitation. Get immediate medical attention.

Ingestion: If this chemical has been swallowed, DO NOT induce vomiting. Give 1 or 2 glasses of water or milk. Never give anything by mouth to an unconscious or convulsing person. Get medical attention immediately.

DOUBLE EAGLE
STEEL COATING COMPANY

Waste Pickle Dump Holding Tank
Tank 11

Exterior on elevated platform
Outside of Door 10
Inside dike

Hydrochloric Acid, Residuals from Strip, Clear liquid

Tank 11 is located outside the plant, inside a dike on the West side of the site, outside Door 10. Gravity feed from Tank 10 (5th floor) by operation of manual valves, located at West side and base of Tank 10. Product is either bled to WWT or pumped from tank to tank truck to empty approximately one per month.

Hydrochloric acid is a colorless to yellow aqueous liquid with a pungent odor or odorless. This tank contains variable amounts (6% to 16%) of hydrochloric acid and (94% to 84%) water. Fumes irritate the eyes and mucous membranes. Gases and liquid are very corrosive to metals and tissue. Ph is normally 2 to 3.

Hydrochloric acid is used in the plating process and at the Pickle Rinse tank on Sixth Floor.

HEALTH HAZARDS
TOXIC; inhalation, ingestion or contact (skin, eyes) with vapors, dusts or substance may cause severe injury, burns, or death. Reaction with water or moist air will release toxic, corrosive or flammable gases. Reaction with water may generate much heat, which will increase the concentration of fumes in the air. Fire will produce irritating, corrosive and/or toxic gases. Runoff from fire control or dilution water may be corrosive and/or toxic and cause pollution. (DOT, 2000) USCG, 1999)

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
HYDROCHLORIC ACID, SOLUTION is an aqueous solution of hydrogen chloride, an acidic gas, Reacts exothermically with organic bases (amines, amides) and inorganic bases (oxides and hydroxides of metals). Reacts exothermically with carbonates (including limestone and building materials containing limestone) and hydrogen carbonates to generate carbon dioxide. Reacts with sulfides, carbides, borides, and phosphides to generate toxic or flammable gases. Reacts with many metals (including aluminum, zinc, calcium, magnesium, iron, tin and all of the alkali metals) to generate flammable hydrogen gas. Reacts violently with acetic anhydride, 2-aminoethanol, ammonium hydroxide, calcium phosphide, chlorosulfonic acid, 1,1-difluoroethylene, ethylenediamine, ethyleneimine, oleum, perchloric acid, b-propiolactone, propylene oxide, silver perchlorate/carbon tetrachloride mixture, sodium hydroxide, uranium(IV) phosphide, vinyl acetate, calcium carbide, rubidium carbide, cesium acetylide, rubidium acetylide, magnesium boride, mercury(II) sulfate [Lewis]. Mixtures with concentrated sulfuric acid can evolve toxic hydrogen chloride gas at a dangerous rate. Undergoes a very energetic reaction with calcium phosphide [Mellor 8:841(1946-1947)].
REACTIVE GROUPS:
Acids, Inorganic Non-oxidizing (Reactivity, 2001)

First Aid

Move victim to fresh air. Call 911 or emergency medical service. Apply artificial respiration if victim is not breathing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult. Remove and isolate contaminated clothing and shoes. In case of contact with substance, immediately flush skin or eyes with running water for at least 15 minutes. For minor skin contact, avoid spreading material on unaffected skin. Keep victim warm and quiet. Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. (DOT, 2000)

Avoid breathing vapors. Keep upwind. Avoid bodily contact with the material. Wear appropriate chemical protective gloves, boots and goggles. Do not handle broken packages unless wearing appropriate personal protective equipment. Wash away any material that may have contacted the body with copious amounts of water or soap and water. If contact with the material anticipated, wear appropriate chemical protective clothing. (© AAR, 1999)

Personal Protective Equipment-

Full Face Piece Air Purifying Respirator
Chemical Splash Goggles
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

PPE - MATERIAL RATINGS

NAT RUB
GLOVES > 3 hours

NEOP
GLOVES > 3 hours

NITRILE
GLOVES > 3 hours

NITRILE+PVC
FABRIC > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

PVC
FABRIC > 3 hours
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

Waste Pickle Dump Holding Tank
Tank 11

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 157 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or Self Contained Breathing Apparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

4. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel. Drains to Chemical Building may be the best solution.

5. Attempt to keep spill inside the dike. Use spill kits to redirect flow or to accumulate liquid. If overflow is problem, consider closing valve on 5th floor at Tank 10
   USE SPILL BLOCKER TO COVER NEAREST SEWER

6. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks.
   NEUTRALIZE WITH LIME SLURRY (Available at WWT, near Door 14).
   DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager.

   Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn

Eye: Immediately flush eyes with large amounts of water for at least 15 minutes, by the clock, while holding eyelids open. Transport to the nearest medical facility for additional treatment.

Skin: Remove contaminated clothing. Immediately flush with large amounts of water for at least 15 minutes, by the clock, and follow by washing with soap if available. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with water, then drink sips of water to remove taste from mouth. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. Transport to nearest medical facility for additional treatment.

Inhalation: Move victim to fresh air. If the victim has difficult breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

DOUBLE EAGLE
STEEL COATING COMPANY

62.5 % ZINC CHLORIDE SOLUTION TANK 3

Zinc Chloride stored on site in the bulk storage tank in the tank farm on West Road and located inside the dike. The mixture is pumped into the Zinc Solution. Tank 3 has a capacity of 15,000 gallons.

Zinc Chloride is a pale yellow colored solution containing zinc chloride and ammonia. The dissolved zinc ion is complexed by ammonia. Corrosive to both metals and tissue. Readily evolves toxic ammonia gas (© AAR, 1999).

CHEMICAL PROFILE
CORROSIVE LIQUIDS CONTAINING ZINC CHLORIDE AND Ammonia act as bases. Neutralize acids exothermically to produce water and ammonium salts, which, being generally water-soluble, stay in solution. The heat can cause evolution of quantities of unreacted ammonia as a corrosive, irritating gas. Mixing with strong bases and heating also cause evolution of gaseous ammonia. Form salts with oxidizing acids (such as ammonium chlorate) that may explode if obtained in dry or nearly dry form [Kirk-Othmer, 3rd ed., Vol. 2, 1978, p. 470]. React with fluorine, chlorine, bromine and iodine and some of the interhalogen compounds (bromine pentafluoride, chlorine trifluoride) Mixing of bleaching powder (hypochlorite solution) with ammonia solutions produces toxic/explosive ammonia trichloride vapors.

REACTIVE GROUPS:
Bases, Salts, Acidic Inorganic/Organic (Reactivity, 2001)

Zinc Chloride is not compatible with potassium, strong oxidizing agents, or strong caustic compounds

HEALTH HAZARDS
This material may be harmful to if swallowed, inhaled, or injected into skin. This solution can cause irritation to eyes, skin, and respiratory system.

Inhalation: may lead to irritation of the nose and throat. Inhalation of material in concentrations above the TLV or PEL may lead to headaches, hoarseness, coughing, chest pains, cyanosis, fever, nausea, vomiting, shortness of breath, pneumonia.

Eyes: can lead to irritations of the eye and corneal burns.

Skin: can lead to severe burns or dermatitis and ulceration, depending upon concentration and duration of exposure.

Ingestion: can lead to stomach pains, nausea, vomiting, bloody diarrhea, accumulations of fluid in the respiratory system, blood in urine and shock.

FIRST AID

Move victim to fresh air; call emergency medical care. Remove and isolate contaminated clothing and shoes at the site. Take extra care not to contaminate the eyes. In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes. Keep victims quiet and maintain normal body temperature. (© AAR, 1999)

Eye: If this chemical contacts the eyes, immediately wash the eyes with large amounts of water, occasionally lifting the lower and upper lids. Have the victim "roll: eyes. Get medical attention immediately.

Skin: If this chemical contacts the skin, decontaminate with flowing water, while removing contaminated clothing and shoes. Get medical attention immediately.

Swallow: **If this chemical has been swallowed, Contact physician or Poison Control Center Immediately**. Never give anything by mouth to an unconscious or convulsing person. DO NOT Induce Vomiting. Get medical attention immediately.

Personal Protective Equipment-

Skin: Wear appropriate personal protective clothing to prevent skin contact. Chemical resistant suit, rubber gloves, apron and rubber boots.

Eyes: Chemical Splash Goggles and face shield.

Skin: Chemical Resistant Suit or Rubber suit.The worker should immediately flush the skin immediately when it becomes contaminated.

Respiratory: Full-face piece respirator with air purifying filter. Self-Contained Breathing Apparatus if concentration >50mg/m^3.

Remove: All contaminated clothing immediately and keep in an area that avoids further contamination of persons or environment.

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

62.5 % ZINC CHLORIDE SOLUTION TANK 3

Two Basic Goals of Emergency Response:

1. To protect the life and well being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 25 to 50 meters for "Hot Zone" (Guide 154 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or Self Contained Breathing Apparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

4. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks.
   NEUTRALIZE WITH LIME SLURRY (Available at WWT, near Door 14).
   DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager.

Ampho-Mag® neutralizer is available in Fire Pump House

FIRST AID

Move victim to fresh air; call emergency medical care. Remove and isolate contaminated clothing and shoes at the site. Take extra care not to contaminate the eyes. In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes. Keep victims quiet and maintain normal body temperature.

Eyes: If this chemical contacts the eyes, immediately wash the eyes with large amounts of water, occasionally lifting the lower and upper lids. Have the victim "roll: eyes. Get medical attention immediately.

Skin: If this chemical contacts the skin, decontaminate with flowing water, while removing contaminated clothing and shoes. Get medical attention immediately.

Inhalation: Remove victim to fresh air and use artificial respiration if necessary. Remove gross contaminated items to protect rescuers.

Ingestion: **If this chemical has been swallowed, Contact physician or Poison Control Center Immediately**. Never give anything by mouth to an unconscious or convulsing person. DO NOT Induce Vomiting. Get medical attention immediately.

DOUBLE EAGLE
STEEL COATING COMPANY

Zinc Plating Solution
TANK 200 – Zinc Recirculation Tank

Tank 200 is located in the Chemical Building – South end. Solution pump are located on top of this tank. Tank 200 has a capacity of 270,000 gallons.

Tank is filled with a mixture of chemicals listed below:

Hydrochloric Acid	< 1%	Potassium Chloride ≈550g/l
USSPXP9010	< 3.0ml/l	Zinc Chloride – Technical Grade
Zinc Metal High Grade Anodes		

Alloy Plating Solution is rusty colored aqueous liquid with a pungent odor. pH range is 1.9 to 5.6 (typically 4.2 to 5.4). Fumes irritate the eyes and mucous membranes. Very corrosive to metals and tissue. This solution is used in the cells of the plating line and pumped throughout the plant in FRP pipe. **This tank is used to receive and store zinc plating solution.**

HEALTH HAZARDS
TOXIC; inhalation, ingestion or contact (skin, eyes) with vapors, dusts or substance may cause severe injury, burns, or death. Reaction with water or moist air will release toxic, corrosive or flammable gases. Reaction with water may generate much heat, which will increase the concentration of fumes in the air. Fire will produce irritating, corrosive and/or toxic gases. Runoff from fire control or dilution water may be corrosive and/or toxic and cause pollution.

AIR AND WATER REACTIONS:
Fumes somewhat in air. Dilution with water releases some heat.

CHEMICAL PROFILE:
HYDROCHLORIC ACID, SOLUTION is an aqueous solution of hydrogen chloride, an acidic gas, Reacts exothermically with organic bases (amines, amides) and inorganic bases (oxides and hydroxides of metals). Reacts exothermically with carbonates (including limestone and building materials containing limestone) and hydrogen carbonates to generate carbon dioxide. Reacts with sulfides, carbides, borides, and phosphides to generate toxic or flammable gases. Reacts with many metals (including aluminum, zinc, calcium, magnesium, iron, tin and all of the alkali metals) to generate flammable hydrogen gas. Reacts violently with acetic anhydride, 2-aminoethanol, ammonium hydroxide, calcium phosphide, chlorosulfonic acid, 1,1-difluoroethylene, ethylenediamine, ethyleneimine, oleum, perchloric acid, b-propiolactone, propylene oxide, silver perchlorate/carbon tetrachloride mixture, sodium hydroxide, uranium(IV) phosphide, vinyl acetate, calcium carbide, rubidium carbide, cesium acetylide, rubidium acetylide, magnesium boride, mercury(II) sulfate [Lewis]. Mixtures with concentrated sulfuric acid can evolve toxic hydrogen chloride gas at a dangerous rate. Undergoes a very energetic reaction with calcium phosphide [Mellor 8:841(1946-1947)].

REACTIVE GROUPS:
Acids, Inorganic Non-oxidizing (Reactivity, 2001)
Move victim to fresh air. Call 911 or emergency medical service. Apply artificial respiration if victim is not breathing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult. Remove and isolate contaminated clothing and shoes. In case of contact with substance, immediately flush skin or eyes with running water for at least 30 minutes. For minor skin contact, avoid spreading material on unaffected skin. Keep victim warm and quiet. Effects of exposure (inhalation, ingestion or skin contact) to substance may be delayed. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. (DOT, 2000)

Avoid breathing vapors. Keep upwind. Avoid bodily contact with the material. Wear appropriate chemical protective gloves, boots and goggles. Do not handle broken packages unless wearing appropriate personal protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water. If contact with the material anticipated, wear appropriate chemical protective clothing. (© AAR, 1999)

Personal Protective Equipment - When there is risk of contacting solution-

Full Face Piece Air Purifying Respirator or Self Contained Breathing Apparatus
Chemical Splash Goggles and Full Face Splash Shield
Rubber Boots
Rubber Gloves
Hard Hat
TyChem® Suit

MATERIAL RATINGS

NAT RUB
GLOVES > 3 hours

NEOP
GLOVES > 3 hours

NITRILE
GLOVES > 3 hours

NITRILE+PVC
FABRIC > 3 hours

PE/EVAL/PE
GLOVES > 3 hours

PVC
FABRIC > 3 hours
GLOVES > 3 hours

(NOAA, 1991)

DOUBLE EAGLE
STEEL COATING COMPANY

QUICK CARD

ZINC PLATING SOLUTION
TANK 200

Two Basic Goals of Emergency Response:

1. To protect the life and well-being of each employee and visitor.
2. To protect and/or minimize destruction to property.

Consider isolation of at least 50 to 100 meters for "Hot Zone" (Guide 157 – DOT/ERG)
Stay upwind until proper Personal Protective Equipment is available and worn!

Personal Protective Equipment:	Saranex Suit
	Hard Hat
Highlighted items	Safety Glasses*
in Spill Response Boxes	Splash Goggles*
	Rubber Boots
	Rubber Gloves
	Splash Shield *
	Full Facepiece Respirator / with filters
	Or **S**elf **C**ontained **B**reathing **A**pparatus

* Items not needed if wearing full-face respirator.

1. Evacuate immediate area of unprotected personnel.

2. Contact Main Gate with information regarding type of emergency and assistance is needed.

3. Consider your own safety first. Consider potential for IDLH before donning a respirator. If a person needs medical assistance, put your PPE, including a respirator, on before you enter the contaminated area to assist that person. Any skin contact will cause severe burns. Remove the person to a safety shower immediately and remove all contaminated clothing as soon as possible.

4. Keep material out of water sources and sewers. Build dikes to contain flow as necessary. If spill is inside dike, leave it there. WWT will treat or pump as determined by knowledgeable personnel.
   USE SPILL BLOCKER TO COVER NEAREST SEWER

5. Absorb bulk liquid with commercial sorbents and Pink Mats or Socks.
   NEUTRALIZE WITH LIME SLURRY (Available at WWT, near Door 14).
   DISPOSE OF MATERIALS IN SUITABLE CONTAINERS. Notify Environmental Manager.
   Ampho-Mag® neutralizer is available in Fire Pump House

Information derived from Hydrochloric Acid MSDS
Revision #2

FIRST AID

DO NOT attempt to rescue the victim unless proper respiratory protection is worn. Move victim to fresh air. If the victim has difficult breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Eye: Immediately flush eyes with large amounts of water for at least 15 minutes, by the clock, while holding eyelids open. Transport to the nearest medical facility for additional treatment. ***Do not rub eyes***.

Skin: Remove contaminated clothing. Immediately flush with large amounts of water for at least 15 minutes, by the clock, and follow by washing with soap if available. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.

Ingestion: DO NOT induce vomiting. Have the victim rinse mouth out with water, then drink sips of water to remove taste from mouth. DO NOT GIVE LIQUIDS TO A DROWSY, CONVULSING OR UNCONSCIOUS PERSON. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. Transport to nearest medical facility for additional treatment.

Revised:
09/08/2009

Double Eagle Steel Coating Company
Weekly Safety Cabinet Audit / Maintenance Office

Item	Suggested Amount	Amount Before	Amount Added	Amount After
Chemical Goggles	6			
Safety Glasses	2			
Face Shield Brackets	2			
Face Shields	2			
Dust Masks	1 Box			
Cloth Gloves – White Cotton	24 pair			
Neoprene Gloves	1 dozen			
Gloves - Leather				
Top Gun	1 dozen			
Tyvek Suits	2 boxes			
Rain Suits	3			
MSA Full Face Respirator	1			
Respirator Cartridge Filter	2 pr.			
Caution Tape (yellow)	1			
Danger Tape (red)	1			
Rescue Harness Bag (Black) with 4 rescue harnesses	1			

Date:_____ Inspector Signature: _____

Revised:
09/08/2009

Double Eagle Steel Coating Company
Weekly Safety Cabinet Audit / Terminal Building

Item	Suggested Amount	Amount Before	Amount Added	Amount After
Chemical Goggles	6			
Face Shield Brackets	4			
Face Shields	4			
Dust Masks	1 Box			
Neoprene Gloves	1 dozen			
Tyvek Suits	4 sizes			
Large	6			
X-Large	6			
2X-Large	6			
3X-Large	6			
MSA Full Face Respirator	1			
Respirator Cartridge Filter	2 pair			
Kevlar Sleeves – w / bartack fingers and Thumb hole – 18"	1 dozen			
Danger Tape (red)	1			
Caution Tape (yellow)	1			

Date:_____ Inspector Signature: _____

Revised:
09/08/2009

Double Eagle Steel Coating Company
Weekly Safety Cabinet Audit / Waste Water Treatment

Item	Suggested Amount	Amount Before	Amount Added	Amount After
Chemical Goggles	6			
Safety Glasses	2			
Face Shield Brackets	4			
Face Shields	4			
Dust Masks	2 Box			
Cloth Gloves – White Cotton	24 pair			
- Brown Jersey	24 pair			
Neoprene Gloves	2 dozen			
Gloves - Leather				
Top Gun	1 dozen			
Tyvek Suits	2 boxes			
MSA Full Face Respirator	1			
Respirator Cartridge Filter	2 pr.			
Caution Tape (Yellow)	1			
Danger Tape (Red)	1			
EX- Fit Ear Plugs	1 box			

Date:_____ Inspector Signature: _____

ITEM	EMPLOYEE	POSITION	ENVIRON-MENTAL
			SPCC/SWPPP
			PIPP/RCRA
			CITE
1	ANDERSON, KRYSTYAN		6/9/2015
2	BAIR, DUANE	MECHANICAL	
3	BARRAGAN, ANTONIO		6/9/2015
4	BROWN, CHARI		6/9/2015
5	BUIE, DONALD		6/22/2015
6	BUNTIER, FRANK	MECHANICAL	
	DONG, RUSSELL	MAINTENANCE	
7	DANIELS, JOHN	LINE OPERATOR	6/9/2015
8	FEALA, DAVID	ENTRY OPERATOR	6/9/2015
9	HALGREN, TROY		6/9/2015
10	HANKIN, DONALD	QA LAB TECH	6/11/2015
11	HADDEN, DALE	ELECTRICIAN	
12	HORTON, ASHANTE		6/9/2015
13	JACKSON, ALETHA		
	JENKINS, DAVID	ELECTRICIAN	
14	JESSEN, LARRY	MECHANICAL	
15	JONES, DONALD	ENTRY OPERATOR	6/9/2015
16	KAVI, WES		6/9/2015
17	KEEN, PETER	LINE OPERATOR	
18	KIRCHEN, SHAWN		
19	KOZMA, DANIEL	MECHANICAL	
20	KRELL, COREY	INSPECTOR	6/9/2015
21	KRUSE, KENNETH		6/9/2015
22	LABONTE, MARK		6/9/2015
23	LANG, JEFFREY		6/9/2015
24	LLOYD, EDWARD	ELECTRICIAN	
25	MADRIGAL, E. MONICA		
26	MCCULLOUGH, JIM	SHIFT MANAGER	6/9/2015
27	MCGEE, TIFFANY		6/11/2015
28	MOORE, LARONDA	QA LAB TECH	6/11/2015
29	MOSS, KATHERINE		6/9/2015
30	MULLINS, CHAD	ENTRY OPERATOR	6/9/2015
31	MYAARD, KYLE		6/22/2015
32	NAPIANTEK, CIYNTHIA		6/9/2015
33	NOVAKOV, ZORAN	LINE OPERATOR	6/9/2015
34	ONEILL, VALERIE	MATERIAL HANDLER / INSPECTOR	6/9/2015

ITEM	EMPLOYEE	POSITION	ENVIRON-MENTAL
			SPCC/SWPPP
			PIPP/RCRA
			CITE
35	PETROWSKI, GEORGE	MATERIAL HANDLER / INSPECTOR	6/9/2015
36	QUEEN, DOUGLAS		
37	RANDAZZO, ANTHONY		6/22/2015
38	RICHTER, RICHARD	SUPERVISOR	6/9/2015
	RILEY, MARSHA	ELECTRICAL PLANNING	
39	RUSSELL, DOUG	ELECTRICIAN	
40	SIMMONS, MIKE		6/22/2015
41	SMALL, MARGARET		6/9/2015
42	SMITH, JEFFREY		6/22/2015
43	STRUGIS, MARK		6/9/2015
44	SULLIVAN, JAMES	QA LAB TECH	6/11/2015
45	THOMASON, YVETTE		6/9/2015
46	TUCKER, MICHAEL	ELECTRICIAN	
47	TUCKER, ROBERT	LINE ??	6/9/2015
48	VYAS, RAVI		
49	WERNER, JACOB	ENTRY OPERATOR	6/9/2015
	WILSON, GLEN	ELECTRICIAN	
50	WILSON, THOMAS		6/9/2015
51	YOUNG, KEVIN	QA LAB TECH	6/11/2015
52	ZURAWSKI, JOHN		6/22/2015
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54		UPDATED 7/20/15	
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ITEM	EMPLOYEE	POSITION	ENVIRON-MENTAL
			SPCC/SWPPP
			PIPP/RCRA
			CITE
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Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "UNITED STATES STEEL CORPORATION", FILED IN THIS OFFICE ON THE THIRTIETH DAY OF APRIL, A.D. 2014, AT 2:55 O'CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE KENT COUNTY RECORDER OF DEEDS.

3396733 8100

140541251

You may verify this certificate online at corp.delaware.gov/authver.shtml

Jeffrey W. Bullock, Secretary of State

AUTHENTICATION: 1336296

DATE: 05-01-14

461708v2

State of Delaware
Secretary of State
Division of Corporations
Delivered 02:57 PM 04/30/2014
FILED 02:55 PM 04/30/2014
SRV 140541251 - 3396733 FILE

CERTIFICATE OF AMENDMENT
TO
RESTATED CERTIFICATE OF INCORPORATION
OF
UNITED STATES STEEL CORPORATION

It is hereby certified as follows:

1. The name of the Corporation is United States Steel Corporation.

2. The Seventh Article of the Restated Certificate of Incorporation is revised to read as follows:

   SEVENTH: The number of directors of the Corporation shall be fixed from time to time by, or in the manner provided in, its by-laws and may be increased or decreased as therein provided; but the number thereof shall not be less than three.

   The directors of the Corporation shall be classified as follows. The term of office for the class of directors elected at the 2012 annual meeting of stockholders shall expire at the 2015 annual meeting of stockholders; the term of office for the class of directors elected at the 2013 annual meeting of stockholders shall expire at the 2016 annual meeting of stockholders; and the term of office for the class of directors elected at the 2014 annual meeting of stockholders shall expire at the 2017 annual meeting of stockholders, with the members of each such class to hold office until their successors are elected and qualified. The directors elected at the 2015 annual meeting of stockholders and at each subsequent annual meeting of stockholders shall hold office for a term expiring at the next annual meeting of stockholders and until their successors are elected and qualified.

   In the case of any vacancy created by an increase in the number of directors of the Corporation, the additional director or directors shall be elected by the Board of Directors, and such additional director or directors so elected shall hold office until the next annual meeting of stockholders and until their successors are elected and qualified.

   In the case of any vacancy in the Board of Directors from any cause other than an increase in the number of directors, a successor to hold office for the unexpired portion of the term of the director whose place became vacant shall be elected by a majority of the Board of Directors then in office, though less than a quorum.

   Directors of the Corporation may be removed only for cause until the election of directors at the 2017 annual meeting of stockholders.

3. The amendment to the restated certificate of incorporation herein certified has been duly adopted in accordance with the provisions of Section 242 of the General Corporation Law of the State of Delaware.

This certificate was executed on April 30, 2014.

Secretary
J.A. Napoli

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF ALLEGHENY

On this 30th day of April 2014, before me, a Notary Public in and for said Commonwealth, personally appeared J. A. Napoli, the Secretary of United States Steel Corporation, known to me and by me to be the person who executed the foregoing instrument on behalf of said corporation.

Notary Public

My Commission Expires:

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Stephanie R. Kiser, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Feb. 18, 2018
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Certificate of Correction to the
Restated Certificate of Incorporation of
United States Steel Corporation

Pursuant to 103(f) of the
General Corporation Law of the State of Delaware

UNITED STATES STEEL CORPORATION, a Delaware corporation (the "Corporation"), does hereby certify as follows:

FIRST: A Restated Certificate of Incorporation (the "Restated Certificate of Incorporation") was filed by the Corporation with the State of Delaware on September 30, 2003.

SECOND: The Certificate of Incorporation was an inaccurate record of the Corporation's intent in that there were two typographical errors in Exhibit B, Section 9(ii)(g) and (h) on page B-11.

THIRD: A period should appear at the end of Section 9(ii)(g) on page B-11.

FOURTH: In the 15th line of Section 9(ii)(h), the word "Conversation" should be replaced with "Conversion".

FIFTH: The Restated Certificate of Incorporation and the Certificate of Correction of the Restated Certificate of Incorporation have been prepared in accordance with the provision of Section 103(f) of the General Corporation Law of the State of Delaware.

IN WITNESS WHEREOF, the Corporation has caused this Corrected Restated Certificate of Incorporation to be executed this 18th day of December, 2003.

UNITED STATES STEEL CORPORATION

By: Craig D. Mallick
Craig D. Mallick
Authorized Person

[286836v1]

split becomes effective" or "the day upon which such combination becomes effective," as the case may be, and "the day upon which such subdivision, split or combination becomes effective" within the meaning of paragraph (c) of this Section 9(ii)).

(h) Calculation of Adjustments. All adjustments to the Conversion Rate shall be calculated to the nearest 1/10,000th of a share of Common Stock (or if there is not a nearest 1/10,000th of a share to the next lower 1/10,000th of a share). No adjustment in the Conversion Rate shall be required unless such adjustment would require an increase or decrease of at least 1% therein; provided, that any adjustments which by reason of this subparagraph are not required to be made shall be carried forward and taken into account in any subsequent adjustment. If an adjustment is made to the Conversion Rate pursuant to paragraph (a), (b), (c), (d), (e), (f), (g) or (i) of this Section 9(ii), an adjustment shall also be made to the Average Market Price solely to determine which of clauses (a), (b) or (c) of the definition of Conversion Rate will apply on the Conversion Date. Such adjustment shall be made by multiplying the Average Market Price by a fraction, the numerator of which shall be the Conversion Rate immediately after such adjustment pursuant to paragraph (a), (b), (c), (d), (e), (f), (g) or (i) of this Section 9(ii) and the denominator of which shall be the Conversion Rate immediately before such adjustment; provided, that if such adjustment to the Conversion Rate is required to be made pursuant to the occurrence of any of the events contemplated by paragraph (a), (b), (c), (d), (e), (f) or (g) of this Section 9(ii) during the period taken into consideration for determining the Average Market Price, appropriate and customary adjustments shall be made to the Conversion Rate.

(i) Increase of Conversion Rate. The Corporation may make such increases in the Conversion Rate, in addition to those required by this Section 9(ii), as it considers to be advisable in order to avoid or diminish any income tax to any Holders of Common Stock resulting from any dividend or distribution of stock or issuance of rights or warrants to purchase or subscribe for stock or from any event treated as such for income tax purposes or for any other reasons. The Corporation shall have the power to resolve any ambiguity or correct any error in this Section 9(ii) and its action in so doing, as evidenced by a resolution of the Board of Directors, shall be final and conclusive.

(j) Notice of Adjustment. Whenever the Conversion Rate is adjusted in accordance with Section 9(ii), the Corporation shall: (i) forthwith compute the Conversion Rate in accordance with Section 9(ii), and prepare and transmit to the Transfer Agent an Officer's Certificate setting forth the Conversion Rate, the method of calculation thereof in reasonable detail, and the facts requiring such adjustment and upon which such adjustment is based; and (ii) as soon as practicable following the occurrence of an event that requires an adjustment to the Conversion Rate pursuant to Sections 9(ii) (or if the Corporation is not aware of such occurrence, as soon as practicable after becoming so aware) provide a written notice to the Holders of this Series of the occurrence of such event and a statement setting forth in reasonable detail the method by which the adjustment to the Conversion Rate was determined and setting forth the adjusted Conversion Rate.

(iii) In the event of:

(a) any consolidation or merger of the Corporation with or into another person (other than a merger or consolidation in which the Corporation is the surviving corporation and in which the Common Stock outstanding immediately prior to

Delaware

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE RESTATED CERTIFICATE OF "UNITED STATES STEEL CORPORATION", FILED IN THIS OFFICE ON THE THIRTIETH DAY OF SEPTEMBER, A.D. 2003, AT 9:02 O'CLOCK A.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE KENT COUNTY RECORDER OF DEEDS.

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

3396733 8100

030627255

AUTHENTICATION: 2663370

DATE: 09-30-03

State of Delaware
Secretary of State
Division of Corporations
Delivered 09:02 AM 09/30/2003
FILED 09:02 AM 09/30/2003
SRV 030627255 - 3396733 FILE

RESTATED CERTIFICATE OF INCORPORATION

OF

UNITED STATES STEEL CORPORATION

Originally formed as a Delaware limited liability company under the name "United States Steel LLC" on May 25, 2001 and converted to a Delaware corporation, pursuant to Section 265 of the Delaware General Corporation Law and Section 18-216 of the Delaware Limited Liability Company Act, on December 31, 2001 under the name first set forth below

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FIRST: The name of the Corporation (which is hereinafter referred to as the "Corporation") is

UNITED STATES STEEL CORPORATION

SECOND: Its registered office and place of business in the State of Delaware is located at 9 East Loockerman Street, Suite 1B, City of Dover, County of Kent. The registered agent in charge thereof upon whom process against the Corporation may be served is National Registered Agents, Inc.

THIRD: The purposes of the Corporation are to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware, and without limiting the foregoing to engage in integrated steel operations and to develop, mine, produce, manufacture, construct, transport, buy, hold, sell and generally deal in products, materials, property, both tangible and intangible, and services of all kinds.

FOURTH: The total number of shares of capital stock which the Corporation shall have authority to issue is Four Hundred Forty Million (440,000,000), of which Four Hundred Million (400,000,000) shares shall be Common Stock having a par value of one dollar ($1.00) per share and Forty Million (40,000,000) shares shall be shares of Preferred Stock, without par value (hereinafter called "Preferred Stock").

A statement of the designations of the Preferred Stock or of any series thereof, and the powers, preferences and relative, participating, optional or other special rights, and qualifications, limitations or restrictions thereof, or of the authority of the Board of Directors to fix by resolution or resolutions such designations and other terms not fixed by the Certificate of Incorporation, is as follows:

1. The Preferred Stock may be issued in one or more series, from time to time, with each such series to have such designation, powers, preferences and relative, participating, optional or other special rights, and qualifications, limitations or restrictions thereof, as shall be stated and expressed in the resolution or resolutions providing for the issue of such series adopted by the Board of Directors of the Corporation, subject to the limitations prescribed by law and in accordance with the provisions hereof, the Board of Directors being hereby expressly

vested with authority to adopt any such resolution or resolutions. The authority of the Board of Directors with respect to each such series shall include, but not be limited to, the determination or fixing of the following:

i. The distinctive designation and number of shares comprising such series, which number may (except where otherwise provided by the Board of Directors in creating such series) be increased or decreased (but not below the number of shares then outstanding) from time to time by like action of the Board of Directors;

ii. The dividend rate of such series, the conditions and times upon which such dividends shall be payable, the relation which such dividends shall bear to the dividends payable on any other class or classes of stock or series thereof, or any other series of the same class, and whether dividends shall be cumulative or non-cumulative;

iii. The conditions upon which the shares of such series shall be subject to redemption by the Corporation and the times, prices and other terms and provisions upon which the shares of the series may be redeemed;

iv. Whether or not the shares of the series shall be subject to the operation of a retirement or sinking fund to be applied to the purchase or redemption of such shares and, if such retirement or sinking fund be established, the annual amount thereof and the terms and provisions relative to the operation thereof;

v. Whether or not the shares of the series shall be convertible into or exchangeable for shares of any other class or classes, with or without par value, or of any other series of the same class, and, if provision is made for conversion or exchange, the times, prices, rates, adjustments, and other terms and conditions of such conversion or exchange;

vi. Whether or not the shares of the series shall have voting rights, in addition to the voting rights provided by law, and, if so, subject to the limitation hereinafter set forth, the terms of such voting rights;

vii. The rights of the shares of the series in the event of voluntary or involuntary liquidation, dissolution, or upon the distribution of assets of the Corporation;

viii. Any other powers, preferences and relative, participating, optional or other special rights, and qualifications, limitations or restrictions thereof, of the shares of such series, as the Board of Directors may deem advisable and as shall not be inconsistent with the provisions of this Certificate of Incorporation.

2. The holders of shares of the Preferred Stock of each series shall be entitled to receive, when and as declared by the Board of Directors, out of funds legally available for the payment of dividends, dividends at the rates fixed by the Board of Directors for such series, and no more, before any dividends, other than dividends payable in Common Stock, shall be declared and paid, or set apart for payment, on the Common Stock with respect to the same dividend period.

3. Whenever, at any time, dividends on the then outstanding Preferred Stock as may be required with respect to any series outstanding shall have been paid or declared and set apart for payment on the then outstanding Preferred Stock, and after complying with respect to any

retirement or sinking fund or funds for any series of Preferred Stock, the Board of Directors may, subject to the provisions of the resolution or resolutions creating any series of Preferred Stock, declare and pay dividends on the Common Stock, and the holders of shares of the Preferred Stock shall not be entitled to share therein.

4. The holders of shares of the Preferred Stock of each series shall be entitled upon liquidation or dissolution or upon the distribution of the assets of the Corporation to such preferences as provided in the resolution or resolutions creating such series of Preferred Stock, and no more, before any distribution of the assets of the Corporation shall be made to the holders of shares of the Common Stock.

5. Except as otherwise provided by a resolution or resolutions of the Board of Directors creating any series of Preferred Stock or by the General Corporation Law of Delaware, the holders of shares of the Common Stock issued and outstanding shall have and possess the exclusive right to notice of stockholders' meetings and the exclusive power to vote. The holders of shares of the Preferred Stock issued and outstanding shall, in no event, be entitled to more than one vote for each share of Preferred Stock held by them unless otherwise required by law.

Pursuant to the authority conferred by this Article Fourth, the following series of Preferred Stock have been designated, each such series consisting of such number of shares, with such voting powers and with such designations, preferences and relative, participating, optional or other special rights, and qualifications, limitations or restrictions as are stated and expressed in Exhibits A through B attached hereto and incorporated herein by reference:

Exhibit A: Series A Junior Preferred Stock

Exhibit B: 7.00% Series B Mandatory Convertible Preferred Shares

FIFTH: The existence of the Corporation is to be perpetual.

SIXTH: The private property of the stockholders shall not be subject to the payment of corporate debts to any extent whatever.

SEVENTH: The number of directors of the Corporation shall be fixed from time to time by, or in the manner provided in, its by-laws and may be increased or decreased as therein provided; but the number thereof shall not be less than three.

The directors of the Corporation shall be divided into three classes: Class I, Class II and Class III. Each class shall consist, as nearly as may be possible, of one-third of the whole number of the Board of Directors. Each of the Class I directors shall hold office until the 2002 annual meeting of the stockholders, each of the Class II directors shall hold office until the 2003 annual meeting of the stockholders, and each of the Class III directors shall hold office until the 2004 annual meeting of the stockholders, and in the case of each class, until their respective successors are duly elected and qualified. At each annual election held from and after the 2002 annual meeting of the stockholders, directors elected to succeed those whose terms expire shall be identified as being of the same class as the directors they succeed and shall be elected to hold office for a term to expire at the third annual meeting of the stockholders after their election, and until their respective successors are duly elected and qualified. If the number of directors is changed, any increase or decrease in directors shall be apportioned among the classes so as to maintain all classes as equal in number as possible, and any additional director elected to any

class shall hold office for a term which shall coincide with the terms of the other directors in such class and until his successor is duly elected and qualified.

In the case of any increase in the number of directors of the Corporation, the additional director or directors shall be elected by the Board of Directors.

In the case of any vacancy in the Board of Directors from death, resignation, disqualification or other cause, a successor to hold office for the unexpired portion of the term of the director whose place shall be vacant, and until the election of his successor, shall be elected by a majority of the Board of Directors then in office, though less than a quorum.

Directors of the Corporation may be removed only for cause.

EIGHTH: The Board of Directors shall have power to adopt, amend and repeal the by-laws at any regular or special meeting of the Board of Directors, *provided* that notice of intention to adopt, amend or repeal the by-laws in whole or in part shall have been included in the notice of meeting; or, without any such notice, by a vote of two-thirds of the directors then in office.

Stockholders may adopt, amend and repeal the by-laws at any regular or special meeting of the stockholders by an affirmative vote of two-thirds of the shares outstanding and entitled to vote thereon, *provided* that notice of intention to adopt, amend or repeal the by-laws in whole or in part shall have been included in the notice of the meeting.

Any action required to be taken at any annual or special meeting of the stockholders of the Corporation, or any action which may be taken at any annual or special meeting of the stockholders or otherwise, may not be taken without a meeting, prior notice and a vote, and stockholders may not act by written consent.

NINTH: The Board of Directors from time to time shall determine whether and to what extent, and at what times and places, and under what conditions and regulations, the accounts and books of the Corporation, or any of them, shall be open to the inspection of the stockholders, and no stockholder shall have any right to inspect any account or book or document of the Corporation, except as conferred by law or authorized by the Board of Directors, or by the stockholders.

TENTH: The directors may from time to time declare such dividends as they shall deem advisable and proper, subject to the provisions of Article Fourth and to such restrictions as may be imposed by law, and pay the same to the stockholders at such times as they shall fix.

The Board of Directors shall have power to issue bonds, debentures, or other obligations, either non-convertible or convertible into the Corporation's stock, subject to the provisions of Article Fourth and upon such terms, in such manner and under such conditions in conformity with law, as may be fixed by the Board of Directors prior to the issue of such bonds, debentures or other obligations.

ELEVENTH: No director shall be personally liable to the Corporation or its stockholders for monetary damages for any breach of fiduciary duty by such director as a director, except (i) for breach of the director's duty of loyalty to the Corporation or its stockholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (iii) pursuant to Section 174 of the Delaware General Corporation Law, or (iv) for any transaction from which the director derived an improper personal benefit. No amendment to or repeal of this

Article Eleventh shall apply to or have any effect on the liability or alleged liability of any director of the Corporation for or with respect to any acts or omissions of such director occurring prior to such amendment or repeal.

TWELFTH: The powers and authorities hereinbefore conferred upon the Board of Directors are in furtherance and not in limitation of those conferred by the laws of the State of Delaware.

THIRTEENTH: The Corporation reserves the right at any time and from time to time to amend, alter, change or repeal any provision contained in this Certificate of Incorporation in the manner now or hereafter prescribed by law, and all rights, preferences and privileges of whatsoever nature conferred upon stockholders, directors or any other persons whomsoever by and pursuant to this Certificate of Incorporation in its present form or as hereafter amended are granted subject to the rights reserved in this Article.

IN WITNESS WHEREOF, this Restated Certificate of Incorporation, which only restates and integrates and does not further amend the provisions of the Certificate of Incorporation of this Corporation as heretofore amended or supplemented, there being no discrepancies between those provisions and the provisions of this Certificate of Incorporation, and it having been duly adopted by the Corporation's Board of Directors in accordance with Section 245 of the Delaware General Corporation Law, has been executed by its duly authorized officer this 30th day of September, 2003.

UNITED STATES STEEL CORPORATION

BY: _____

T. J. Usher
Chairman of the Board of Directors and
Chief Executive Officer

EXHIBIT A

SERIES A JUNIOR PREFERRED STOCK

Section 1. *Designation and Amount.*

The shares of this series shall be designated as "Series A Junior Preferred Stock" and the number of shares constituting such series shall be 2,000,000.

Section 2. *Dividends and Distributions.*

(a) Subject to the prior and superior rights of the holders of any shares of any series of Preferred Stock ranking prior and superior to the shares of Series A Junior Preferred Stock with respect to dividends, the holders of shares of Series A Junior Preferred Stock shall be entitled to receive, when, as and if declared by the Board of Directors out of funds legally available for the purpose, quarterly dividends payable in cash on the first day of March, June, September and December in each year (each such date being referred to herein as a "Quarterly Dividend Payment Date"), commencing on the first Quarterly Dividend Payment Date after the first issuance of a share or fraction of a share of Series A Junior Preferred Stock, in an amount per share (rounded to the nearest cent) equal to the greater of (a) $5.00 or (b) subject to the provision for adjustment hereinafter set forth, 100 times the aggregate per share amount of all cash dividends, and 100 times the aggregate per share amount (payable in kind) of all non-cash dividends or other distributions other than a dividend payable in shares of Common Stock or a subdivision of the outstanding shares, of Common Stock (by reclassification or otherwise), to be or being declared on the Common Stock, par value $1.00 per share, of the Corporation (the "Common Stock") with respect to the same dividend period. If the Quarterly Dividend Payment Date is a Saturday, Sunday or legal holiday then such Quarterly Dividend Payment Date shall be the first immediately preceding calendar day which is not a Saturday, Sunday or legal holiday. In the event the Corporation shall at any time after December 31, 2001 (the "Rights Declaration Date") (i) declare any dividend on Common Stock payable in shares of Common Stock, (ii) subdivide the outstanding Common Stock, or (iii) combine the outstanding Common Stock into a smaller number of shares, then in each such case the amount to which holders of shares of Series A Junior Preferred Stock were entitled immediately prior to such event under clause (b) of the preceding sentence shall be adjusted by multiplying such amount by a fraction the numerator of which is the number of shares of Common Stock outstanding immediately after such event and the denominator of which is the number of shares of Common Stock that were outstanding immediately prior to such event.

(b) The Corporation shall declare a dividend or distribution on the Series A Junior Preferred Stock as provided in paragraph (a) above immediately prior to the time it declares a dividend or distribution on the Common Stock (other than a dividend payable in shares of Common Stock); provided that, in the event no dividend or distribution shall be declared on the Common Stock with respect to a particular dividend period, a dividend of $5.00 per share on the Series A Junior Preferred Stock shall nevertheless be payable on such Quarterly Dividend Payment Date with respect to such quarterly period.

(c) Dividends shall begin to accrue and be cumulative on outstanding shares of Series A Junior Preferred Stock from the Quarterly Dividend Payment Date next preceding the date of issue of such shares of Series A Junior Preferred Stock, unless the date of issue of such shares is prior to the record date for the first Quarterly Dividend Payment Date, in which case dividends on such shares shall begin to accrue from the date of issue of such shares, or unless the date of issue is a Quarterly Dividend Payment Date or is a date after the record date for the determination of holders of shares of Series A Junior Preferred Stock entitled, to receive a quarterly dividend and before such Quarterly Dividend Payment Date, in either of which events such dividends shall begin to accrue and be cumulative from such Quarterly Dividend Payment Date. Accrued but unpaid dividends shall not bear interest. Dividends paid on the shares of Series A Junior Preferred Stock in an amount less than the total amount of such dividends at the time accrued and payable on such shares shall be allocated pro rata on a share-by-share basis among all such shares at the time outstanding. The Board of Directors may fix a record date for the determination of holders of shares of Series A Junior Preferred Stock entitled to receive payment of a dividend or distribution declared thereon, which record date shall be no more than 30 days prior to the date fixed for the payment thereof. Dividends in arrears may be declared and paid at any time, without reference to any Quarterly Dividend Payment Date, to holders of record on such date, not exceeding 45 days preceding the payment date thereof, as may be fixed by the Board of Directors.

(d) Except as hereinafter provided, no dividends shall be declared or paid or set apart for payment on the shares of Series A Junior Preferred Stock for any period if the Corporation shall be in default in the payment of any dividends (including cumulative dividends, if applicable) on any shares of Preferred Stock ranking, as to dividends, prior to the Series A Junior Preferred Stock, unless the same shall be contemporaneously declared and paid.

(e) Dividends payable on the Series A Junior Preferred Stock for the initial dividend period and, for any period less than a full quarterly period, shall be computed on the basis of a 360-day year of 30-day months.

Section 3. *Voting Rights.*

The holders of shares of Series A Junior Preferred Stock shall have the following voting rights:

(a) Each share of Series A Junior Preferred Stock shall entitle the holder thereof to one vote on all matters submitted to a vote of the stockholders of the Corporation. The holders of Series A Junior Preferred Stock shall be entitled to notice of all meetings of the stockholders of the Corporation.

(b) Except as otherwise provided herein or by law, the holders of shares of Series A Junior Preferred Stock and the holders of shares of Common Stock shall vote together as one class on all matters submitted to a vote of stockholders of the Corporation.

(c) If, on the date used to determine stockholders of record for any meeting of stockholders for the election of directors, a default in preference dividends on the Preferred Stock shall exist, the number of directors constituting the Board of Directors of the Corporation shall be increased by two, and the holders of the Preferred Stock of all series (whether or not

the holders of such series of Preferred Stock would be entitled to vote for the election of directors if such default in preference dividends did not exist), shall have the right at such meeting, voting together as a single class without regard to series, to the exclusion of the holders of Common Stock, to elect two directors of the Corporation to fill such newly created directorships. Each director elected by the holders of shares of Preferred Stock (herein called a "Preferred Director"), shall continue to serve as such director for the full term for which he shall have been elected, notwithstanding that prior to the end of such term a default in preference dividends shall cease to exist. Any Preferred Director may be removed by, and shall not be removed except by, the vote of the holders of record of the outstanding shares of Preferred Stock, voting together as a single class without regard to series, at a meeting of the stockholders, or of the holders of shares of Preferred Stock, called for the purpose. So long as a default in any preference dividends on the Preferred Stock shall exist (i) any vacancy in the office of a Preferred Director may be filled except as provided in the following clause (ii) by an instrument in writing signed by the remaining Preferred Director and filed with the Corporation and (iii) in the case of the removal of any Preferred Director, the vacancy may be filled by the vote of the holders of the outstanding shares of Preferred Stock, voting together as a single class without regard to series, at the same meeting at which such removal shall be voted. Each director appointed as aforesaid by the remaining Preferred Director shall be deemed, for all purposes hereof, to be a Preferred Director. Whenever the term of office of the Preferred Directors shall end and no default in preference dividends shall exist, the number of directors constituting the Board of Directors of the Corporation shall be reduced by two. For the purposes of this paragraph (c), a "default in preference dividends" on the Preferred Stock shall be deemed to have occurred whenever the amount of accrued and unpaid dividends upon any series of the Preferred Stock shall be equivalent to six full quarterly dividends or more, and, having so occurred, such default shall be deemed to exist thereafter until, but only until all accrued dividends on all shares of Preferred Stock of each and every series then outstanding shall have been paid through the last Quarterly Dividend Payment Date.

Section 4. *Certain Restrictions.*

(a) Whenever quarterly dividends or other dividends or distributions payable on the Series A Junior Preferred Stock as provided in Section 2 are in arrears, thereafter and until all accrued and unpaid dividends and distributions, whether or not declared, on shares of Series A Junior Preferred Stock outstanding shall have been paid in full, the Corporation shall not:

(i) declare or pay dividends on, or make any other distributions on (other than a dividend in Common Stock or in any other stock of the Corporation ranking junior to the Series A Junior Preferred Stock as to dividends and upon liquidation, dissolution or winding up and other than as provided in subparagraph (ii) of this section), or redeem or purchase or otherwise acquire for consideration (except by conversion into or exchange for stock of the Corporation ranking junior to the Series A Junior Preferred Stock as to dividends and upon dissolution, liquidation or winding up), any shares of stock ranking junior (either as to dividends or upon liquidation, dissolution or winding up) to the Series A Junior Preferred Stock;

(ii) declare or pay dividends on or make any other distributions on any shares of stock ranking on a parity (either as to dividends or upon liquidation, dissolution or winding up) with the Series A Junior Preferred Stock, except dividends paid ratably on the Series A Junior Preferred Stock and all stock ranking on a parity with the Series A Junior Preferred Stock as to dividends on which dividends are payable or in arrears in proportion to the total amounts to which the holders of all such shares are then entitled;

(iii) redeem or purchase or otherwise acquire for consideration shares of any stock ranking on a parity (either as to dividends or upon liquidation, dissolution or winding up) with the Series A Junior Preferred Stock, provided that the Corporation may at any time redeem, purchase or otherwise acquire shares of any such parity stock in exchange for shares of any stock of the Corporation ranking junior (as to dividends and upon dissolution, liquidation or winding up) to the Series A Junior Preferred Stock;

(iv) purchase or otherwise acquire for consideration any shares of Series A Junior Preferred Stock, except in accordance with a purchase offer made in writing or by publication (as determined by the Board of Directors) to all holders of such shares upon such terms as the Board of Directors, after consideration of the respective annual dividend rates and other relative rights and preferences of the respective series and classes, shall determine in good faith will result in fair and equitable treatment among the respective series or classes.

(b) The Corporation shall not permit any subsidiary of the Corporation to purchase or otherwise acquire for consideration any shares of stock of the Corporation unless the Corporation could, under paragraph (a) of this Section 4, purchase or otherwise acquire such shares at such time and in such manner.

Section 5. *Reacquired Shares.*

Any shares of Series A Junior Preferred Stock purchased or otherwise acquired by the Corporation, in any manner whatsoever shall be retired and cancelled promptly after the acquisition thereof. All such shares shall upon their cancellation become authorized but unissued shares of Preferred Stock and may be reissued as part of a new series of Preferred Stock to be created by resolution or resolutions of the Board of Directors, subject to the conditions and restrictions on issuance set forth herein.

Section 6. *Liquidation, Dissolution or Winding Up.*

(a) In the event of any voluntary or involuntary liquidation, dissolution or winding up of the Corporation, the holders of the Series A Junior Preferred Stock shall be entitled to receive the greater of (a) $100 per share, plus accrued dividends to the date of distribution, whether or not earned or declared, or (b) an amount per share, subject to the provision for adjustment hereinafter set forth, equal to 100 times the aggregate amount to be distributed per share to holders of Common Stock (the "Series A Liquidation Preference"). In the event the Corporation shall at any time after the Rights Declaration Date (i) declare any dividend on Common Stock payable in shares of Common Stock, (ii) subdivide the outstanding Common Stock or (iii) combine the outstanding Common Stock into a smaller number of shares, then in each such

case the amount to which holders of shares of Series A Junior Preferred Stock were entitled immediately prior to such event pursuant to clause (b) of the preceding sentence shall be adjusted by multiplying such amount by a fraction the numerator of which is the number of shares of Common Stock outstanding immediately after such event and the denominator of which is the number of shares of Common Stock that were outstanding immediately prior to such event.

(b) In the event, however, that there are not sufficient assets available to permit payment in full of the Series A Liquidation Preference and the liquidation preferences of all other series of preferred stock, if any, which rank on a parity with the Series A Junior Preferred Stock, then such remaining assets shall be distributed ratably to the holders of such parity shares in proportion to their respective liquidation preferences.

Section 7. *Consolidation, Merger, etc.*

In case the Corporation shall enter into any consolidation, merger, combination or other transaction in which the shares of Common Stock are exchanged for or changed into other stock or securities, cash and/or any other property, then in any such case the shares of Series A Junior Preferred Stock shall at the same time be similarly exchanged or changed in an amount per share (subject to the provision for adjustment hereinafter set forth) equal to 100 times the aggregate amount of stock, securities, cash and/or any other property (payable in kind), as the case may be, into which or for which each share of Common Stock is changed or exchanged. In the event the Corporation shall at any time after the Rights Declaration Date (i) declare any dividend on Common Stock payable in shares of Common Stock, (ii) subdivide the outstanding Common Stock, or (iii) combine the outstanding Common Stock into a smaller number of shares, then in each such case the amount set forth in the preceding sentence with respect to the exchange or change of shares of Series A Junior Preferred Stock shall be adjusted by multiplying such amount by a fraction the numerator of which is the number of shares of Common Stock outstanding immediately after such event and the denominator of which is the number of shares of Common Stock that were outstanding immediately prior to such event.

Section 8. *Optional Redemption.*

(a) The Corporation shall have the option to redeem the whole or any part of the Series A Junior Preferred Stock at any time on at least 30 days notice in accordance with the provisions of paragraph (b) of this Section 8 at a redemption price equal to, subject to the provision for adjustment hereinafter set forth, 100 times the "current per share market price" of the Common Stock on the date of the mailing of the notice of redemption, together with unpaid accumulated dividends to the date of such redemption. In the event the Corporation shall at any time after December 31, 2001 (i) declare any dividend on Common Stock payable in shares of Common Stock, (ii) subdivide the outstanding Common Stock or (iii) combine the outstanding Common Stock into a smaller number of shares, then in each such case the amount to which holders of shares of Series A Junior Preferred Stock were otherwise entitled immediately prior to such event under the preceding sentence shall be adjusted by multiplying such amount by a fraction the numerator of which is the number of shares of Common Stock outstanding immediately after such event and the denominator of which is the number of shares of Common Stock that were outstanding immediately prior to such event. The "current per share market price" on any date shall be deemed to be the average of the closing price per share of such Common Stock for the 10 consecutive Trading Days (as such term is hereinafter defined) immediately prior to such date. The closing price for each day shall be the last sale price,

regular way, or, in case no such sale takes place on such day, the average of the closing bid and asked prices regular way, in either case as reported in the principal consolidated transaction reporting system with respect to securities listed or admitted to trading on the New York Stock Exchange or, if the Common Stock is not listed or admitted to trading on the New York Stock Exchange, as reported in the principal consolidated transaction reporting system with respect to securities listed or admitted to trading on the principal national securities exchange on which the Common Stock is listed or admitted to trading or, if the Common Stock is not listed or admitted to trading on any national securities exchange, the last quoted price or, if not so quoted the average of the high bid and low asked prices in the over-the-counter market, as reported by the National Association of Securities Dealers, Inc. Automated Quotations System ("NASDAQ") or such other system then in use or, if on any such date the Common Stock is not quoted by any such organization, the average of the closing bid and asked prices as furnished by a professional market maker making a market in the Common Stock selected by the Corporation. If on such date no such market maker is making a market in the Common Stock, the fair value of the Common Stock on such date as determined in good faith by the Board of Directors of the Corporation shall be used. The term "Trading Day" shall mean a day on which the principal national securities exchange on which the Common Stock is listed or admitted to trading is open for the transaction of business or, if the Common Stock is not listed or admitted to trading on any national securities exchange, a Monday, Tuesday, Wednesday, Thursday or Friday on which banking institutions in the State of New York are not authorized or obligated by law or executive order to close.

(b) Whenever shares of Series A Junior Preferred Stock are to be redeemed, the Corporation shall mail a notice ("Notice of Redemption") by first-class mail, postage prepaid, to each holder of record of shares of Series A Junior Preferred Stock to be redeemed and to the transfer agent for the Series A Junior Preferred Stock. The Notice of Redemption shall be addressed to the holder at the address of the holder appearing on the stock transfer books of the Corporation maintained by the transfer agent for the Series A Junior Preferred Stock. The Notice of Redemption shall include a statement of (i) the redemption date, (ii) the redemption price, (iii) the number of shares of Series A Junior Preferred Stock to be redeemed, (iv) the place or places where shares of the Series A Junior Preferred Stock are to be surrendered for payment of the redemption price, (v) that the dividends on the shares to be redeemed will cease to accrue on such redemption date, and (vi) the provision under which redemption is made. No defect in the Notice of Redemption or in the mailing thereof shall affect the validity of the redemption proceedings, except as required by law. From the date on which a Notice of Redemption shall have been given as aforesaid and the Corporation shall have deposited with the transfer agent for the Series A Junior Preferred Stock a sum sufficient to redeem the shares of Series A Junior Preferred Stock as to which Notice of Redemption has been given, with irrevocable instructions and authority to pay the redemption price to the holders thereof, or if no such deposit is made, then upon such date fixed for redemption (unless the Corporation shall default in making payment of the redemption price), all rights of the holders thereof as stockholders of the Corporation by reason of the ownership of such shares (except their right to receive the redemption price thereof, but without interest), shall terminate, including, but not limited to, their right to receive dividends, and such shares shall no longer be deemed outstanding. The Corporation shall be entitled to receive, from time to time, from the transfer agent for Series A Junior Preferred Stock the interest, if any, on such monies deposited with it and, the holders of any shares so redeemed shall have no claim to any such interest. In case

the holder of any shares so called for redemption shall not claim the redemption price for his shares within one year after the date of redemption, the transfer agent for the Series A Junior Preferred Stock shall, upon demand, pay over to the Corporation such amount remaining on deposit and the transfer agent for the Series A Junior Preferred Stock shall thereupon be relieved of all responsibility to the holders of such shares and such holder of the shares of the Series A Junior Preferred Stock so called for redemption shall look only to the Corporation for the payment thereof.

(c) In the event that fewer than all the outstanding shares of the Series A Junior Preferred Stock are to be redeemed, the number of shares to be redeemed shall be determined by the Board of Directors and the shares to be redeemed shall be determined by lot or pro rata as may be determined by the Board of Directors or by any other method as may be determined by the Board of Directors in its sole discretion to be equitable.

(d) If the Corporation shall be in default in the payment of any dividends (including cumulative dividends, if applicable) on any shares of Preferred Stock ranking, as to dividends, prior to the Series A Junior Preferred Stock, then no shares of the Series A Junior Preferred Stock shall be redeemed and the Corporation shall not purchase or otherwise acquire any shares of the Series A Junior Preferred Stock.

Section 9. *Ranking.*

(a) The Series A Junior Preferred Stock shall rank junior to all other series of the Corporation's Preferred Stock as to the payment of dividends and the distribution of assets upon liquidation, dissolution or winding up, unless the terms of any such series shall provide otherwise.

(b) For purposes hereof, any stock of any class or classes of the Corporation shall be deemed to rank:

(i) prior to the shares of the Series A Junior Preferred Stock, either as to dividends or upon liquidation, dissolution or winding up, if the holders of such class or classes shall be entitled to the receipt of dividends or of amounts distributable upon dissolution, liquidation or winding up of the Corporation, whether voluntary or involuntary, as the case may be, in preference or priority to the holders of shares of the Series A Junior Preferred Stock. Each holder of any share of the Series A Junior Preferred Stock, by his acceptance thereof, expressly covenants and agrees that the rights of the holders of any shares of any other series of Preferred Stock of the Corporation to receive dividends or amounts distributable upon liquidation, dissolution or winding up of the Corporation, whether voluntary or involuntary, shall be and hereby are expressly prior to his rights unless in the case of any particular series of Preferred Stock the certificate or other instrument creating or evidencing the same expressly provides that the rights of the holders of such series shall not be prior to the shares of the Series A Junior Preferred Stock; and

(ii) on a parity with shares of the Series A Junior Preferred Stock, either as to dividends or upon liquidation, whether or not the dividend rates, dividend payment dates or redemption or liquidation prices per share or sinking fund provisions, if any, be different from those of the Series A Junior Preferred Stock, if the holders of such stock

shall be entitled to the receipt of dividends or of amounts distributable upon dissolution, liquidation or winding up of the Corporation, whether voluntary or involuntary, as the case may be, in proportion to their respective dividend rates or liquidation prices, without preference or priority, one over the other, as between the holders of such stock and the holders of shares of the Series A Junior Preferred Stock; and

(iii) Junior to shares of the Series A Junior Preferred Stock, either as to dividends or upon liquidation, if such class or classes shall be Common Stock or if the holders of shares of the Series A Junior Preferred Stock shall be entitled to receipt of dividends or of amounts distributable upon dissolution, liquidation or winding up of the Corporation, whether voluntary or involuntary, as the case may be, in preference or priority to the holders of shares of such class or classes.

Section 10. *Amendment.*

Except as otherwise set forth in this Certificate of Incorporation, Preferences and Rights with respect to the Series A Junior Preferred Stock, holders of Series A Junior Preferred Stock shall not have any special powers and their consent shall not be required for taking any corporate action, *provided, however, that:*

(1) Unless the vote or consent of the holders of a greater number of shares shall then be required by law, the consent of the holders of at least 66-2/3% of all of the shares of the Series A Junior Preferred Stock at the time outstanding, given in person or by proxy, either in writing or by a vote at a meeting called for the purpose at which the holders of shares of the Series A Junior Preferred Stock shall vote together as a separate class, shall be necessary for authorizing, effecting or validating the amendment, alteration or repeal of any of the provisions of the Certificate of Incorporation or of any certificate amendatory thereof or supplemental thereto (including any Certificate of Designation, Preferences and Rights or any similar document relating to any series of Preferred Stock) so as to affect adversely the powers, preferences, or rights, of this Series A Junior Preferred Stock. The increase of the authorized amount of the Preferred Stock, or the creation, authorization or issuance of any shares of any other class of stock of the Corporation ranking prior to or on a parity with the shares of the Series A Junior Preferred Stock as to dividends or upon liquidation, or the reclassification of any authorized or outstanding stock of the Corporation into any such prior or parity shares, or the creation, authorization or issuance of any obligation or security convertible into or evidencing the right to purchase any such prior or parity shares shall not be deemed to affect adversely the powers, preferences or rights of the Series A Junior Preferred Stock.

Section 11. *Fractional Shares.*

Series A Junior Preferred Stock may be issued in fractions of a share which shall entitle the holder, in proportion to such holder's fractional shares, to exercise voting rights, receive dividends, participate in distributions and to have the benefit of all other rights of holders of Series A Junior Preferred Stock.

EXHIBIT B

7.00% SERIES B MANDATORY CONVERTIBLE PREFERRED SHARES

Section 1. *Designation and Number of Shares.*

Out of the 40,000,000 shares of preferred stock of the Corporation authorized by the Certificate of Incorporation of the Corporation, 5,750,000 shall be, and be designated as, 7.00% Series B Mandatory Convertible Preferred Shares without par value (hereinafter referred to as this "Series"). The number of authorized shares of this Series may be reduced by further resolution adopted by the Board of Directors and by filing of a certificate pursuant to the provisions of the General Corporation Law of the State of Delaware stating that such reduction has been so authorized, but the number of authorized shares of this Series shall not be increased.

Section 2. *Ranking.*

This Series shall rank, with respect to dividends and distributions upon the liquidation, winding-up or dissolution of the Corporation (i) senior to (a) the Common Stock, par value $1.00 per share, of the Corporation (the "Common Stock") and (b) to each other class or series of stock of the Corporation (including any series of preferred stock established after February 4, 2003 by the Board of Directors) the terms of which do not expressly provide that it ranks senior to or on a parity with this Series as to dividends and distributions upon the liquidation, winding-up or dissolution of the Corporation and (ii) junior to any equity security, the terms of which expressly provide that such class or series will rank senior to this Series as to dividends and distributions upon liquidation, winding-up or dissolution of the Corporation.

Section 3. *Dividends.*

(i) General. The dividend rate on shares of this Series shall be $3.50 per annum, provided that the initial dividend on this Series for the dividend period commencing on February 10, 2003, to but excluding June 15, 2003, will be $1.206 per share, in each case subject to adjustment as provided in Section 12(ii) hereof. Cumulative cash dividends shall be payable quarterly when, as and if declared by the Board of Directors of the Corporation or a duly authorized committee thereof, out of the assets of the Corporation legally available therefore on the 15th calendar day (or the following business day if the 15th is not a business day) of March, June, September and December (each such date being referred to herein as a "Dividend Payment Date"), provided, that the initial dividend shall be payable, if declared, on June 15, 2003. The amount of dividends payable on each share of this Series for each quarterly period thereafter shall be computed by dividing the annual dividend rate by four. The amount of dividends payable for any other period that is shorter or longer than a dividend period will be computed on the basis of a 360-day year consisting of twelve 30-day months.

A dividend period is the period ending on the day before a Dividend Payment Date and beginning on the preceding Dividend Payment Date or, if none, the date of issue. Dividends payable, if declared, on a Dividend Payment Date shall be payable to Holders (as defined below) of record as they appear on the stock register of the Corporation on the record date, which shall be the close of business on the first calendar day of the calendar month in which the applicable Dividend Payment Date falls (each, a "Dividend Record Date").

Dividends on this Series shall be cumulative if the Corporation fails to declare or pay one or more dividends on this Series in any amount, whether or not the earnings or financial condition of the Corporation were sufficient to pay such dividends in whole or in part.

Holders of shares of this Series shall not be entitled to any dividend, whether payable in cash, property or stock, in excess of the then applicable full dividends calculated pursuant to this Section 3(i) (including accrued dividends, if any) on shares of this Series. No interest or sum of money in lieu of interest shall be payable in respect of any dividend or payment which may be in arrears.

Dividends in arrears on this Series not declared for payment or paid on any Dividend Payment Date may be declared by the Board of Directors of the Corporation or a duly authorized committee thereof and paid on any date fixed by the Board of Directors of the Corporation or a duly authorized committee thereof, whether or not a Dividend Payment Date, to the Holders of record of the shares of this Series, as they appear on the stock register of the Corporation on a record date selected by the Board of Directors of the Corporation or a duly authorized committee thereof, which shall be not more than 60 days prior to the date fixed for such dividend payment.

(ii) Payment Restrictions. The Corporation may not declare or pay any dividend or make any distribution of assets (other than dividends paid or other distributions made in capital stock of the Corporation ranking junior to this Series as to the payment of dividends and the distribution of assets upon liquidation, dissolution or winding-up and cash in lieu of fractional shares in connection with any such dividend or distribution) on, or redeem, purchase or otherwise acquire (except upon conversion or exchange for capital stock of the Corporation ranking junior to this Series as to the payment of dividends and the distribution of assets upon liquidation, dissolution or winding-up and cash in lieu of fractional shares in connection with any such conversion or exchange), the Corporation's Common Stock or any other stock of the Corporation ranking junior to this Series as to the payment of dividends and the distribution of assets upon liquidation, dissolution or winding-up, unless all accrued and unpaid dividends on this Series for all prior dividend periods have been or contemporaneously are declared and paid and the full quarterly dividend on this Series for the current dividend period has been or contemporaneously is declared and set apart for payment.

Whenever all accrued and unpaid dividends on this Series for all prior dividend periods are not paid in full, the Corporation may not redeem, purchase or otherwise acquire (except upon conversion or exchange for capital stock of the Corporation ranking junior to this Series as to the payment of dividends and the distribution of assets upon liquidation, dissolution or winding-up and cash in lieu of fractional shares in connection with any such conversion or exchange), other capital stock of the Corporation then outstanding ranking on a parity with this Series as to the payment of dividends and the distribution of assets upon liquidation, dissolution or winding-up, including this Series.

Section 4. *Liquidation Preference.*

In the event of any liquidation, dissolution or winding-up of the Corporation, the Holders of shares of this Series shall be entitled to receive out of the assets of the Corporation legally available for distribution to stockholders, before any distribution of assets is made on the Common Stock of the Corporation or any other class or series of stock of the Corporation ranking junior to this Series as to the distribution of assets upon liquidation, dissolution or

winding-up, a liquidating distribution, in the amount of $50 per share, subject to adjustment as provided in Section 12(ii) hereof, plus an amount equal to the sum of all accrued and unpaid dividends (whether or not earned or declared) for the portion of the then-current dividend period until the payment date and all dividend periods prior thereto.

Neither the sale nor transfer of all or substantially all of the property or business of the Corporation, nor the merger or consolidation of the Corporation into or with any other corporation, nor the merger or consolidation of any other corporation into or with the Corporation shall constitute a liquidation, dissolution or winding-up, for the purposes of the foregoing paragraph. After the payment to the Holders of the shares of this Series of the full preferential amounts provided for above, the Holders of the shares of this Series as such shall have no right or claim to any of the remaining assets of the Corporation.

In the event the assets of the Corporation available for distribution to the Holders of the shares of this Series upon any liquidation, dissolution or winding-up of the Corporation, whether voluntary or involuntary, shall be insufficient to pay in full all amounts to which such Holders are entitled as provided above, no such distribution shall be made on account of any other stock of the Corporation ranking on a parity with this Series as to the distribution of assets upon such liquidation, dissolution or winding-up, unless a pro rata distribution is made on this Series and such other stock of the Corporation, with the amount allocable to each series of such stock determined on the basis of the aggregate liquidation preference of the outstanding shares of each series and distributions to the shares of each series being made on a pro rata basis.

Section 5. *Voting Rights.*

(i) The Holders of shares of this Series shall have no voting rights, except as set forth below or as expressly required by applicable law. In exercising any such vote, each outstanding share of this Series shall be entitled to one vote.

(ii) If the equivalent of six quarterly dividends payable, whether consecutively or not, on this Series or any other class or series of preferred stock ranking on a parity with this Series as to the payment of dividends has not been paid, the number of directors of the Corporation shall be increased by two (without duplication of any increase, resulting from the same failure to pay dividends, made pursuant to the terms of any other series of preferred stock of the Corporation ranking on a parity with this Series as to payment of dividends and which does not have a separate class vote and upon which like voting rights have been conferred and are exercisable (this Series, together with such other class or classes, the "Electing Preferred Shares")), and the Holders of this Series, voting as a single class with the holders of shares of any such other class of preferred stock, shall have the exclusive right to vote for and to elect such two directors at any meeting of stockholders of the Corporation at which directors are to be elected held during the period such dividends remain in arrears. Each class or series of preferred stock entitled to vote for the additional directors shall have a number of votes proportionate to the aggregate liquidation preference of its outstanding shares. Such voting right shall continue until full cumulative dividends for all past dividend periods on all such preferred stock of the Corporation, including any shares of this Series, have been paid or declared and set apart for payment. Any such elected directors shall serve until the Corporation's next annual meeting of stockholders (notwithstanding that prior to the end of such term the right to elect directors shall cease to exist) or until their respective successors shall be elected and qualify.

(iii) Whenever such exclusive voting right shall vest, it may be exercised initially either at a special meeting of Holders of Electing Preferred Shares or at any annual stockholders' meeting, but thereafter it shall be exercised only at annual stockholders' meetings. Any director who shall have been elected by the Holders of Electing Preferred Shares as a class pursuant to this Section 5 may be removed at any time, either for or without cause by, and only by, the affirmative votes of the Holders of record of a majority of the outstanding shares of Electing Preferred Shares given at a special meeting of such stockholders called for such purpose, and any vacancy created by such removal may also be filled at such meeting. Any vacancy caused by the death or resignation of a director who shall have been elected by the Holders of Electing Preferred Shares as a class pursuant to this Section 5 may be filled only by the Holders of outstanding Electing Preferred Shares at a meeting called for such purpose.

Any meeting of the Holders of outstanding Electing Preferred Shares entitled to vote as a class for the election or removal of directors shall be held at the place at which the last annual meeting of stockholders was held. At such meeting, the presence in person or by proxy of the Holders of a majority of the outstanding shares of all outstanding Electing Preferred Shares shall be required to constitute a quorum; in the absence of a quorum, a majority of the Holders present in person or by proxy shall have the power to adjourn the meeting from time to time without notice, other than announcement at the meeting, until a quorum shall be present.

(iv) So long as any shares of this Series is outstanding, the affirmative vote or consent of the Holders of at least 66-2/3% of the outstanding shares of this Series will be required for any amendment of the Certificate of Incorporation of the Corporation (or any certificate supplemental thereto, including any Certificate of Designation or any similar document relating to any series of Preferred Stock) that will adversely affect the powers, preferences, privileges or rights of this Series. The affirmative vote or consent of the Holders of at least 66-2/3% of the outstanding shares of this Series and any other series of the preferred stock of the Corporation ranking on a parity with this Series as to payment of dividends and the distribution of assets upon liquidation, dissolution or winding-up, voting as a single class without regard to series, will be required (a) to issue, authorize or increase the authorized amount of, or issue or authorize any obligation or security convertible into or evidencing a right to purchase, any additional class or series of stock ranking prior to this Series as to payment of dividends or the distribution of assets upon liquidation, dissolution or winding-up or (b) to reclassify any authorized stock of the Corporation into any class or series of stock or any obligation or security convertible into or evidencing a right to purchase such stock ranking prior to this Series as to payment of dividends or the distribution of assets upon liquidation, dissolution or winding-up; provided that such vote will not be required for the Corporation to issue, authorize or increase the authorized amount of, or issue or authorize any obligation or security convertible into or evidencing a right to purchase, any stock ranking on a parity with or junior to this Series as to payment of dividends and the distribution of assets upon liquidation, dissolution or winding-up.

Section 6. *Mandatory Conversion.*

(i) Each share of this Series will automatically convert (unless previously converted at the option of the Holder in accordance with Section 7, or a Merger Early Settlement has occurred in accordance with Section 8) on June 15, 2006 or any New Conversion Date, if a Conversion Date Deferral has occurred in accordance with Section 6(ii)(the "Conversion Date"), into a number of newly issued shares of Common Stock equal to the Conversion Rate (as defined in Section 9 below). Dividends on the shares of this Series shall cease to accrue and

such shares of this Series shall cease to be outstanding on the Conversion Date. The Corporation shall make such arrangements as it deems appropriate for the issuance of certificates, if any, representing Common Stock, and for the payment of cash in respect of accrued and unpaid dividends (whether or not earned or declared) on this Series, if any, or cash in lieu of fractional shares of Common Stock, if any, in exchange for and contingent upon surrender of certificates representing the shares of this Series (if such shares are held in certificated form). The Corporation may defer the payment of dividends on the Common Stock issuable upon conversion of shares of this Series and the voting thereof until, and make such payment and voting contingent upon, the surrender of the certificates representing the shares of this Series, provided that the Corporation shall give the Holders of the shares of this Series such notice of any such actions as the Corporation deems appropriate and upon such surrender such Holders shall be entitled to receive such dividends declared and paid on such Common Stock subsequent to the Conversion Date. Amounts payable in cash in respect of the shares of this Series or in respect of such Common Stock shall not bear interest. Transfer or similar taxes in connection with the issuance of Common Stock to any person other than the Holder will be paid by the Holder.

(ii) If the Board of Directors of the Corporation makes a determination in good faith that the payment in cash on June 15, 2006 in respect of all accrued and unpaid dividends on this Series would breach any of the terms of, or constitute a default under, the terms of the Corporation's 10 ¾% Senior Notes due August 1, 2008 (the "Senior Notes"), the Conversion Date shall be deferred (a "Conversion Date Deferral") and the Corporation shall provide prompt notice of such deferral to each Holder, but no earlier than 60 days before June 15, 2006. The Corporation shall also deliver a copy of such notice to the Transfer Agent. Each such notice shall contain the calculations setting forth the Board of Directors' determination as to the potential breach or default of the Senior Notes. Subsequent to any Conversion Date Deferral, promptly after any determination by the Board of Directors of the Corporation in good faith that the payment of cash in respect of all accrued and unpaid dividends on this Series would not breach any of the terms of, or constitute a default under, the terms of the Senior Notes, the Board of Directors shall declare a new conversion date (the "New Conversion Date"). Upon such declaration, the Corporation shall provide notice of the New Conversion Date to each Holder at least 30 days but not more than 60 days before the New Conversion Date. The New Conversion Date shall be the first Dividend Payment Date that is at least 30 days after the delivery of such notice. The Corporation shall also deliver a copy of such notice to the Transfer Agent. Delivery of notice of a Conversion Date Deferral or the New Conversion Date may be satisfied by publishing such notice in an Authorized Newspaper on a Business Day. Notwithstanding any Conversion Date Deferral, dividends shall continue to accrue on this Series until conversion.

Section 7. *Early Conversion at the Option of the Holder.*

(i) Shares of this Series are convertible, in whole or in part, at the option of the Holders thereof ("Optional Conversion"), at any time prior to the Conversion Date, into shares of Common Stock at a rate of 3.1928 shares of Common Stock for each share of this Series, subject to adjustment as set forth in Section 9(ii) below.

(ii) Optional Conversion of shares of this Series may be effected by delivering certificates evidencing such shares (if such shares are held in certificated form), together with written notice of conversion and a proper assignment of such certificates to the Corporation or in blank (and, if applicable, payment of an amount equal to the dividend payable on such shares), to the office of the Transfer Agent (as defined below) for this Series or to any other office or

agency maintained by the Corporation for that purpose and otherwise in accordance with Optional Conversion procedures established by the Corporation. Each Optional Conversion shall be deemed to have been effected immediately prior to the close of business on the date on which the foregoing requirements shall have been satisfied.

(iii) Holders of shares of this Series at the close of business on a Dividend Record Date shall be entitled to receive the dividend payable on such shares on the corresponding Dividend Payment Date notwithstanding the Optional Conversion of such shares following such Dividend Record Date and prior to such Dividend Payment Date. However, shares of this Series surrendered for Optional Conversion after the close of business on a Dividend Record Date and before the opening of business on the next succeeding Dividend Payment Date must be accompanied by payment in cash of an amount equal to the dividend payable on such shares on such Dividend Payment Date. Except as provided above, upon any Optional Conversion of shares of this Series, the Corporation shall make no payment or allowance for unpaid preferred dividends, whether or not in arrears, on such shares of this Series as to which Optional Conversion has been effected or for dividends or distributions on the Common Stock issued upon such Optional Conversion.

Section 8. *Early Conversion Upon Cash Merger.*

(i) In the event of a merger or consolidation of the Corporation of the type described in Section 9(iii) in which the shares of Common Stock outstanding immediately prior to such merger or consolidation are exchanged for consideration consisting of at least 30% cash or cash equivalents (any such event, a "Cash Merger"), then the Corporation (or the successor to the Corporation hereunder) shall be required to offer the Holder of each share of this Series the right to convert shares of this Series prior to the Conversion Date ("Merger Early Settlement") as provided herein. On or before the fifth Business Day after the consummation of a Cash Merger, the Corporation or, at the request and expense of the Corporation, the Transfer Agent, shall give all Holders notice of the occurrence of the Cash Merger and of the right of Merger Early Settlement arising as a result thereof. The Corporation shall also deliver a copy of such notice to the Transfer Agent. Each such notice shall contain:

(a) the date, which shall be not less than 20 nor more than 30 calendar days after the date of such notice, on which the Merger Early Settlement will be effected (the "Merger Early Settlement Date");

(b) the date, which shall be on or one Business Day prior to the Merger Early Settlement Date, by which the Merger Early Settlement right must be exercised;

(c) the Conversion Rate in effect immediately before such Cash Merger and the kind and amount of securities, cash and other property receivable by the Holder upon conversion of shares of this Series pursuant to Section 9(iii); and

(d) the instructions a Holder must follow to exercise the Merger Early Settlement right.

(ii) To exercise a Merger Early Settlement right, a Holder shall deliver to the Transfer Agent at the Corporate Trust Office (as defined below) by 5:00 p.m., New York City time on or one Business Day before the date by which the Merger Settlement right must be exercised as specified in the notice, the certificate(s) (if such shares are held in certificated form) evidencing the shares of this Series with respect to which the Merger Early Settlement right is being

exercised duly endorsed for transfer to the Corporation or in blank with a written notice to the Corporation stating the Holder's intention to convert early in connection with the Cash Merger and providing the Corporation with payment instructions.

(iii) On the Merger Early Settlement Date, the Corporation shall deliver or cause to be delivered the net cash, securities and other property to be received by such exercising Holder determined by assuming the Holder had converted, immediately before the Cash Merger at the Conversion Rate (as adjusted pursuant to Section 9(ii)), the shares of this Series for which such Merger Early Settlement right was exercised into shares of Common Stock. In the event a Merger Early Settlement right shall be exercised by a Holder in accordance with the terms hereof, all references herein to Conversion Date shall be deemed to refer to such Merger Early Settlement Date.

(iv) Upon a Merger Early Settlement, the Transfer Agent shall, in accordance with the instructions provided by the Holder thereof on the notice provided to the Corporation as set forth in paragraph (ii) above deliver to the Holder such net cash, securities or other property issuable upon such Merger Early Settlement together with payment in lieu of any fraction of a share, as provided herein.

(v) In the event that Merger Early Settlement is effected with respect to shares of this Series representing less than all the shares of this Series held by a Holder, upon such Merger Early Settlement the Corporation (or the successor to the Corporation hereunder) shall execute and the Transfer Agent shall authenticate, countersign and deliver to the Holder thereof, at the expense of the Corporation, a certificate evidencing the shares as to which Merger Early Settlement was not effected.

Section 9. *Definition of Conversion Rate: Anti-dilution Adjustments.*

(i) The "Conversion Rate" is equal to (a) if the Average Market Price (as defined below) is greater than or equal to $15.68 (the "Threshold Appreciation Price"), 3.1928 shares of Common Stock per share of this Series, (b) if the Average Market Price is less than the Threshold Appreciation Price, but is greater than $13.05, the number of shares of Common Stock per share of this Series that equals $50 divided by the Average Market Price, and (c) if the Average Market Price is equal to or less than $13.05, 3.8314 shares of Common Stock per share of this Series, in each case subject to adjustment as provided in Section 9(ii) (and in each case rounded upward or downward to the nearest 1/10,000th of a share).

(ii) Upon the occurrence of any of the following events, (x) the formula for determining the Conversion Rate, (y) the number of shares of Common Stock to be delivered on an early conversion as set forth in Sections 7 or 8 and (z) the number of shares of Common Stock to be delivered on mandatory conversion if there has been a Conversion Date Deferral as set forth in Section 6(ii), shall each be subject to the following adjustments (in the case of clauses (y) and (z), as though references to the Conversion Rate were replaced with references to the number of shares of Common Stock to be delivered on such conversion):

(a) Stock Dividends. In case the Corporation shall pay or make a dividend or other distribution on the shares of Common Stock in Common Stock, the Conversion Rate, as in effect at the opening of business on the day following the date fixed for the determination of stockholders entitled to receive such dividend or other distribution shall be increased by dividing such Conversion Rate by a fraction of which the numerator shall be the number of shares of Common Stock outstanding at the close of business on

the date fixed for such determination and the denominator shall be the sum of such number of shares and the total number of shares constituting such dividend or other distribution, such increase to become effective immediately after the opening of business on the day following the date fixed for such determination.

(b) Stock Purchase Rights. In case the Corporation shall issue (other than pursuant to a dividend reinvestment, share purchase or similar plan) rights, options or warrants to all holders of its Common Stock (not being available on an equivalent basis to Holders of the shares of this Series upon conversion) entitling them to subscribe for or purchase shares of Common Stock at a price per share less than the Current Market Price (as defined below) per share of the Common Stock on the date fixed for the determination of stockholders entitled to receive such rights, options or warrants, the Conversion Rate in effect at the opening of business on the day following the date fixed for such determination shall be increased by dividing such Conversion Rate by a fraction, the numerator of which shall be the number of shares of Common Stock outstanding at the close of business on the date fixed for such determination plus the number of shares of Common Stock which the aggregate of the offering price of the total number of shares of Common Stock so offered for subscription or purchase would purchase at such current Market Price and the denominator of which shall be the number of shares of Common Stock outstanding at the close of business on the date fixed for such determination plus the number of shares of Common Stock so offered for subscription or purchase, such increase to become effective immediately after the opening of business on the day following the date fixed for such determination.

(c) Stock Splits; Reverse Splits. In case outstanding shares of Common Stock shall be subdivided or split into a greater number of shares of Common Stock, the Conversion Rate in effect at the opening of business on the day following the day upon which such subdivision or split becomes effective shall be proportionately increased, and, conversely, in case outstanding shares of Common Stock shall each be combined into a smaller number of shares of Common Stock, the Conversion Rate in effect at the opening of business on the day following the day upon which such combination becomes effective shall be proportionately reduced, such increase or reduction, as the case may be, to become effective immediately after the opening of business on the day following the day upon which such subdivision, split or combination becomes effective.

(d) Debt or Asset Distributions. (1) In case the Corporation shall, by dividend or otherwise, distribute to all holders of its Common Stock evidences of its indebtedness or assets (including securities, but excluding any rights, options or warrants referred to in paragraph (b) of this Section 9(ii), any dividend or distribution paid exclusively in cash and any dividend, shares of capital stock of any class or series, or similar equity interests, of or relating to a subsidiary or other business unit in the case of a Spin-Off referred to in the next subparagraph, or distribution referred to in paragraph (a) of this Section 9(ii)), the Conversion Rate shall be increased by dividing the Conversion Rate in effect immediately prior to the close of business on the date fixed for the determination of stockholders entitled to receive such distribution by a fraction, the numerator of which shall be the Current Market Price per share of the Common Stock on the date fixed for such determination less the then fair market value (as determined by the Board of Directors, whose determination shall be conclusive and described in a Board Resolution filed with the Transfer Agent) of the portion of the assets or evidences of indebtedness so distributed applicable to one share of Common Stock and the denominator of which shall be such Current Market Price per share of Common Stock, such adjustment to

become effective immediately prior to the opening of business on the day following the date fixed for the determination of stockholders entitled to receive such distribution. In any case in which this subparagraph (d)(1) is applicable, subparagraph (d)(2) of this Section 9(ii) shall not be applicable.

(2) In the case of a Spin-Off, the Conversion Rate in effect immediately before the close of business on the record date fixed for determination of stockholders entitled to receive that distribution will be increased by multiplying the Conversion Rate by a fraction, the numerator of which is the Current Market Price per share of Common Stock plus the Fair Market Value (as defined below) of the portion of those shares of Capital Stock or similar equity interests so distributed applicable to one share of Common Stock and the denominator of which is the Current Market Price per share of Common Stock. Any adjustment to the Conversion Rate under this subparagraph (d)(2) will occur at the earlier of (A) the tenth Trading Day from, and including the effective date of, the Spin-Off and (B) the date of the securities being offered in the Initial Public Offering of the Spin-Off, if that Initial Public Offering is effected simultaneously with the Spin-Off.

(e) Cash Distributions. In case the Corporation shall (1) by dividend or otherwise, distribute to all holders of its Common Stock cash (excluding any cash that is distributed in a Reorganization Event to which Section 9(iii) applies or as part of a distribution referred to in paragraph (d) of this Section 9(ii)) in an aggregate amount that combined together with (2) the aggregate amount of any other distributions to all holders of its Common Stock made exclusively in cash within the 12 months preceding the date of payment of such distribution and in respect of which no adjustment pursuant to this paragraph (e) or paragraph (f) of this Section 9(ii) has been made and (3) the aggregate of any such cash plus the fair market value, as of the date of the expiration of the tender or exchange offer referred to below (as determined by the Board of Directors, whose determination shall be conclusive and described in a Board Resolution), of the consideration payable in respect of any tender or exchange offer by the Corporation or any of its subsidiaries for all or any portion of the Common Stock concluded within the 12 months preceding the date of payment of the distribution described in clause (1) of this paragraph (e) and in respect of which no adjustment pursuant to this paragraph (e) or paragraph (f) of this Section 9(ii) has been made, exceeds 15% of the product of the Current Market Price (as defined below) per share of Common Stock on the date for the determination of Holders of Common Stock entitled to receive such distribution times the number of shares of Common Stock outstanding on such date, then and in each such case, immediately after the close of business on such date for determination, the Conversion Rate shall be increased so that the same shall equal the rate determined by dividing the Conversion Rate in effect immediately prior to the close of business on the date fixed for determination of the stockholders entitled to receive such distribution by a fraction (A) the numerator of which shall be equal to the Current Market Price per share of Common Stock on the date fixed for such determination less an amount equal to the quotient of (x) the combined amount distributed or payable in the transactions described in clauses (1), (2) and (3) of this paragraph (e) and (y) the number of shares of Common Stock outstanding on such date for determination and (B) the denominator of which shall be equal to the Current Market Price per share of Common Stock on such date for determination.

(f) Tender Offers. In case (1) a tender or exchange offer made by the Corporation or any subsidiary of the Corporation for all or any portion of the Common Stock shall expire and such tender or exchange offer (as amended upon the expiration

thereof) shall require the payment to holders (based on the acceptance (up to any maximum specified in the terms of the tender or exchange offer) of Purchased Shares (as defined below)) of an aggregate consideration having a fair market value (as determined by the Board of Directors, whose determination shall be conclusive and described in a Board Resolution) that combined together with (2) the aggregate of such payment plus the fair market value (as determined by the Board of Directors, whose determination shall be conclusive and described in a Board Resolution), as of the expiration of such tender or exchange offer, of consideration payable in respect of any other tender or exchange offer by the Corporation or any subsidiary of the Corporation for all or any portion of the Common Stock expiring within the 12 months preceding the expiration of such tender or exchange offer and in respect of which no adjustment pursuant to paragraph (e) of this Section 9(ii) or this paragraph (f) has been made and (3) the aggregate amount of any distributions to all Holders of the Corporation's Common Stock made exclusively in cash within the 12 months preceding the expiration of such tender or exchange offer and in respect of which no adjustment pursuant to paragraph (e) of this Section 9(ii) or this paragraph (f) has been made, exceeds 15% of the product of the Current Market Price per share of Common Stock as of the last time (the "Expiration Time") tenders could have been made pursuant to such tender or exchange offer (as it may be amended) times the number of shares of Common Stock outstanding (including any tendered shares) on the Expiration Time, then, and in each such case, immediately prior to the opening of business on the day after the date of the Expiration Time, the Conversion Rate shall be adjusted so that the same shall equal the rate determined by dividing the Conversion Rate immediately prior to the close of business on the date of the Expiration Time by a fraction (A) the numerator of which shall be equal to (x) the product of (I) the Current Market Price per share of Common Stock on the date of the Expiration Time and (II) the number of shares of Common Stock outstanding (including any tendered shares) on the Expiration Time less (y) the amount of cash plus the fair market value (determined as aforesaid) of the aggregate consideration payable to stockholders based on the transactions described in clauses (1), (2) and (3) of this paragraph (f) (assuming in the case of clause (1) the acceptance, up to any maximum specified in the terms of the tender or exchange offer, of Purchased Shares), and (B) the denominator of which shall be equal to the product of (x) the Current Market Price per share of Common Stock as of the Expiration Time and (y) the number of shares of Common Stock outstanding (including any tendered shares) as of the Expiration Time less the number of all shares validly tendered and not withdrawn as of the Expiration Time (the shares deemed so accepted, up to any such maximum, being referred to as the "Purchased Shares").

(g) Reclassification. The reclassification of Common Stock into securities including securities other than Common Stock (other than any reclassification upon a Reorganization Event to which Section 9(iii) applies) shall be deemed to involve (1) a distribution of such securities other than Common Stock to all Holders of Common Stock (and the effective date of such reclassification shall be deemed to be "the date fixed for the determination of stockholders entitled to receive such distribution" and the "date fixed for such determination" within the meaning of paragraph (d) of this Section 9(ii)), and (2) a subdivision, split or combination, as the case may be, of the number of shares of Common Stock outstanding immediately prior to such reclassification into the number of shares of Common Stock outstanding immediate thereafter (and the effective date of such reclassification shall be deemed to be "the day upon which such subdivision or

split becomes effective" or "the day upon which such combination becomes effective," as the case may be, and "the day upon which such subdivision, split or combination becomes effective" within the meaning of paragraph (c) of this Section 9(ii))

(h) Calculation of Adjustments. All adjustments to the Conversion Rate shall be calculated to the nearest 1/10,000th of a share of Common Stock (or if there is not a nearest 1/10,000th of a share to the next lower 1/10,000th of a share). No adjustment in the Conversation Rate shall be required unless such adjustment would require an increase or decrease of at least 1% therein; provided, that any adjustments which by reason of this subparagraph are not required to be made shall be carried forward and taken into account in any subsequent adjustment. If an adjustment is made to the Conversion Rate pursuant to paragraph (a), (b), (c), (d), (e), (f), (g) or (i) of this Section 9(ii), an adjustment shall also be made to the Average Market Price solely to determine which of clauses (a), (b) or (c) of the definition of Conversion Rate will apply on the Conversion Date. Such adjustment shall be made by multiplying the Average Market Price by a fraction, the numerator of which shall be the Conversion Rate immediately after such adjustment pursuant to paragraph (a), (b), (c), (d), (e), (f), (g) or (i) of this Section 9(ii) and the denominator of which shall be the Conversion Rate immediately before such adjustment; provided, that if such adjustment to the Conversation Rate is required to be made pursuant to the occurrence of any of the events contemplated by paragraph (a), (b), (c), (d), (e), (f) or (g) of this Section 9(ii) during the period taken into consideration for determining the Average Market Price, appropriate and customary adjustments shall be made to the Conversion Rate.

(i) Increase of Conversion Rate. The Corporation may make such increases in the Conversion Rate, in addition to those required by this Section 9(ii), as it considers to be advisable in order to avoid or diminish any income tax to any Holders of Common Stock resulting from any dividend or distribution of stock or issuance of rights or warrants to purchase or subscribe for stock or from any event treated as such for income tax purposes or for any other reasons. The Corporation shall have the power to resolve any ambiguity or correct any error in this Section 9(ii) and its action in so doing, as evidenced by a resolution of the Board of Directors, shall be final and conclusive.

(j) Notice of Adjustment. Whenever the Conversion Rate is adjusted in accordance with Section 9(ii), the Corporation shall: (i) forthwith compute the Conversion Rate in accordance with Section 9(ii), and prepare and transmit to the Transfer Agent an Officer's Certificate setting forth the Conversion Rate, the method of calculation thereof in reasonable detail, and the facts requiring such adjustment and upon which such adjustment is based; and (ii) as soon as practicable following the occurrence of an event that requires an adjustment to the Conversion Rate pursuant to Sections 9(ii) (or if the Corporation is not aware of such occurrence, as soon as practicable after becoming so aware) provide a written notice to the Holders of this Series of the occurrence of such event and a statement setting forth in reasonable detail the method by which the adjustment to the Conversion Rate was determined and setting forth the adjusted Conversion Rate.

(iii) In the event of:

(a) any consolidation or merger of the Corporation with or into another person (other than a merger or consolidation in which the Corporation is the surviving corporation and in which the Common Stock outstanding immediately prior to

the merger or consolidation is not exchanged for cash, securities or other property of the Corporation or another corporation); or

(b) any sale, transfer, lease or conveyance to another person of the property of the Corporation as an entirety or substantially as an entirety; or

(c) any statutory exchange of securities of the Corporation with another person (other than in connection with a merger or acquisition) (any such event, a "Reorganization Event"):

each share of this Series outstanding immediately prior to such Reorganization Event shall, after such Reorganization Event, be convertible solely into the kind and amount of securities, cash and other property receivable in such Reorganization Event (without any interest thereon, and without any right to dividends or distribution thereon that have a record date that is prior to the Conversion Date) by a holder of the number of shares of Common Stock (including fractional shares for this purpose) into which such share of this Series (x) might have been converted immediately prior to such Reorganization Event pursuant to Section 7(i), in the case of any conversion of a share of this Series at the option of the Holder thereof, or (y) would have been converted pursuant to Section 6(i) if the Conversion Date had occurred immediately prior to such Reorganization Event, in the case of the mandatory conversion of a share of this Series on the Conversion Date, assuming in each case that such holder of such shares of Common Stock (1) is not a person with which the Corporation consolidated or into which the Corporation merged or which merged into the Corporation or to which such sale or transfer was made, as the case may be (any such person, a "Constituent Person"), or an Affiliate (as defined below) of a Constituent Person to the extent such Reorganization Event provides for different treatment of Common Stock held by Affiliates of the Corporation and non-Affiliates, and (2) failed to exercise his rights of election, if any, as to the kind or amount of securities, cash and other property receivable upon such Reorganization Event (provided that if the kind or amount of securities, cash and other property receivable upon such Reorganization Event is not the same for each share of Common Stock held immediately prior to such Reorganization Event by other than a Constituent Person or an Affiliate thereof and in respect of which such rights of election shall not have been exercised ("Non-electing Share"), then for the purpose of this Section 9(iii) the kind and amount of securities, cash and other property receivable upon such Reorganization Event by each Non-electing Share shall be deemed to be the kind and amount so receivable per share by a plurality of the Non-electing Shares).

In the event of such a Reorganization Event, the person formed by such consolidation, merger or exchange or the person which acquires the assets of the Corporation shall execute and deliver to the Transfer Agent an agreement supplemental hereto providing that the Holder of each share of this Series shall have the rights provided by this Section 9(iii). Such supplemental agreement shall provide for adjustments which, for events subsequent to the effective date of such supplemental agreement, shall be as nearly equivalent as may be practicable to the adjustments provided for in this Section 9. The above provisions of this Section 9(iii) shall similarly apply to successive Reorganization Events.

Section 10. *Definitions.*

(i) "Affiliate" has the same meaning as given to that term in Rule 405 of the Securities Act of 1933, as amended, or any successor rule thereunder.

(ii) "Authorized Newspaper" means a newspaper customarily published at least once a day for at least five days in each calendar week and of general circulation in New York City. Such publication (which may be in different newspapers) is expected to be made in the Eastern edition of *The Wall Street Journal.*

(iii) The "Average Market Price" means the average of the Closing Prices (as defined below) per share of the Common Stock on each of the 20 consecutive Trading Days (as defined below) ending on the third Trading Day immediately preceding (a) June 15, 2006 or, if earlier, the date immediately prior to a Reorganization Event with respect to a conversion pursuant to Section 6 or (b) the date immediately prior to a Cash Merger with respect to a conversion pursuant to Section 8.

(iv) "Business Day" means any day other than a Saturday or Sunday or any other day on which banks in The City of New York are authorized or required by law or executive order to close.

(v) The "Closing Price" of the Common Stock or any securities distributed in a Spin-Off, as the case may be, on any date of determination means the closing sale price (or, if no closing price is reported the last reported sale price) per share on the New York Stock Exchange ("NYSE") on such date or, if such security is not quoted for trading on NYSE on any such date, as reported in the composite transactions for the principal United States securities exchange on which such security is so listed or quoted, or if such security is not so listed or quoted on a United States national or regional securities exchange, as reported by NYSE, or, if such security is not so reported, the last quoted bid price for the such security in the over-the-counter market as reported by the National Quotation Bureau or similar organization, or, if such bid price is not available, the market value of such security on such date as determined by a nationally recognized independent investment banking firm retained for this purpose by the Corporation.

(vi) "Corporate Trust Office" means the principal corporate trust office of the Transfer Agent at which, at any particular time, its corporate trust business shall be administered.

(vii) "Current Market Price" means (a) on any day the average of the Closing Prices for the five consecutive Trading Days preceding the earlier of the day preceding the day in question and the day before the "ex date" with respect to the issuance or distribution requiring computation, (b) in the case of any Spin-Off that is effected simultaneously with an Initial Public Offering of the securities being distributed in the Spin-Off, the Closing Price of the Common Stock on the Trading Day on which the initial public offering price of the securities being distributed in the Spin-Off is determined, and (c) in the case of any other Spin-Off, the average of the Closing Prices of the Common Stock over the first 10 Trading Days after the effective date of such Spin-Off. For purposes of this paragraph, the term "ex date," when used with respect to any issuance or distribution, shall mean the first date on which the Common Stock trades regular way on such exchange or in such market without the right to receive such issuance or distribution.

(viii) "Fair Market Value" means (a) in the case of any Spin-Off that is effected simultaneously with an Initial Public Offering of such securities, the initial public offering price of those securities, and (b) in the case of any other Spin-Off, the average of the Closing Prices of those securities over the first 10 Trading Days after the effective date of such Spin-Off.

(ix) "Holder" means the person in whose name any shares of this Series are registered in the books and records of the Corporation.

(x) "Initial Public Offering" means the first time securities of the same class or type as the securities being distributed in the Spin-Off are offered to the public for cash.

(xi) "Spin-Off" means a dividend or other distribution of shares of capital stock of any class or series, or similar equity interests, of or relating to a subsidiary or other business unit of the Corporation.

(xii) "Trading Day" means a day on which the Common Stock (A) is not suspended from trading on any national or regional securities exchange or association or over-the-counter market at the close of business and (B) has traded at least once on the national or regional securities exchange or association or over-the-counter market that is the primary market for the trading of the Common Stock.

(xiii) "Transfer Agent" shall be the Shareholder Services Division of the Corporation unless and until a successor is selected by the Corporation, and then such successor.

Section 11. *Fractional Shares.*

No fractional Common Stock shall be issued upon the conversion of any shares of this Series. In lieu of any fraction of a share of Common Stock that would otherwise be issuable in respect of the aggregate number of shares of this Series surrendered by the same Holder upon a conversion as described in Sections 7(i), 8 or 9(i), such Holder shall have the right to receive an amount in cash (computed to the nearest cent) equal to the same fraction of (a) in the case of Section 9(i), the Current Market Price or (b) in the case of Sections 7(i) or 8, the Closing Price of the Common Stock determined as of the second Trading Day immediately preceding the effective date of conversion.

Section 12. *Miscellaneous.*

(i) Procedures for conversion of shares of this Series, in accordance with Sections 6, 7 or 8, not held in certificated form will be governed by arrangements among the depositary, participants and persons that may hold beneficial interests through participants designed to permit conversion without the physical movement of certificates. Payments, transfers, deliveries, exchanges and other matters relating to beneficial interests in global security certificates may be subject to various policies and procedures adopted by the depositary from time to time.

(ii) The liquidation preference and the annual dividend rate set forth herein, each shall be subject to equitable adjustment whenever there shall occur a stock split, combination, reclassification or other similar event involving this Series. Such adjustments shall be

determined in good faith by the Board of Directors and submitted by the Board of Directors to the Transfer Agent.

(iii) For the purposes of Section 9, the number of shares of Common Stock at any time outstanding shall not include shares held in the treasury of the Corporation but shall include shares issuable in respect of scrip certificates issued in lieu of fractions of shares of Common Stock. The Corporation will not pay any dividend or make any distribution with respect to shares held in treasury.

(iv) If the Corporation shall take any action affecting the Common Stock, other than action described in Section 9, that in the opinion of the Board of Directors would materially adversely affect the conversion rights of the Holders of the shares of this Series, then (x) the Conversion Rate, (y) the number of shares of Common Stock to be delivered on an early conversion as set forth in Sections 7 or 8 and/or (z) the number of shares of Common Stock to be delivered on mandatory conversion if there has been a Conversion Date Deferral as set forth in Section 6(ii) may each be adjusted, to the extent permitted by law, in such manner, if any, and at such time, as the Board of Directors may determine to be equitable in the circumstances.

(v) The Corporation covenants that it will at all times reserve and keep available, free from preemptive rights, out of the aggregate of its authorized but unissued Common Stock for the purpose of effecting conversion of this Series, the full number of shares of Common Stock deliverable upon the conversion of all outstanding shares of this Series not theretofore converted. For purposes of this Section 12(v), the number of shares of Common Stock that shall be deliverable upon the conversion of all outstanding shares of this Series shall be computed as if at the time of computation all such outstanding shares were held by a single Holder.

(vi) The Corporation covenants that any shares of Common Stock issued upon conversion of shares of this Series shall be validly issued, fully paid and non-assessable.

(vii) The Corporation shall endeavor to list the shares of Common Stock required to be delivered upon conversion of shares of this Series, prior to such delivery, upon each national securities exchange or quotation system, if any, upon which the outstanding shares of Common Stock are listed at the time of such delivery.

(viii) The Corporation will pay any and all documentary stamp or similar issue or transfer taxes payable in respect of the issue or delivery of shares of Common Stock or other securities or property on conversion of shares of this Series pursuant thereto; provided, however, that the Corporation shall not be required to pay any tax that may be payable in respect of any transfer involved in the issue or delivery of shares of Common Stock or other securities or property in a name other than that of the Holder of this Series to be converted and no such issue or delivery shall be made unless and until the person requesting such issue or delivery has paid to the Corporation the amount of any such tax or established, to the reasonable satisfaction of the Corporation, that such tax has been paid.

(ix) This Series is not redeemable.

(x) All shares of this Series shall be deemed outstanding, except from the date of registration of transfer, all shares of this Series held of record by the Corporation or any subsidiary of the Corporation.

(xi) Whenever possible, each provision hereof shall be interpreted in a manner as to be effective and valid under applicable law, but if any provision hereof is held to be prohibited by or invalid under applicable law, such provision shall be ineffective only to the extent of such prohibition or invalidity, without invalidating or otherwise adversely affecting the remaining provisions hereof. If the court of competent jurisdiction should determine that a provision hereof would be valid or enforceable if a period of time were extended or shortened or a particular percentage were increased or decreased, then such court may make such change as shall be necessary to render the provision in question effective and valid under applicable law.

(xii) This Series may be issued in fractions of a share which shall entitle the Holder, in proportion to such Holder's fractional shares, to exercise voting rights, receive dividends, participate in distributions and have the benefit of all other rights of Holders of this Series.

(xiii) Subject to applicable escheat laws, any monies set aside by the Corporation in respect of any payment with respect to shares of this Series, or dividends thereon, and unclaimed at the end of two years from the date upon which such payment is due and payable shall revert to the general funds of the Corporation, after which reversion the Holders of such shares shall look only to the general funds of the Corporation for the payment thereof. Any interest accrued on funds so deposited shall be paid to the Corporation from time to time.

(xiv) Except as may otherwise be required by law, the shares of this Series shall not have any voting powers, preferences and relative, participating, optional or other special rights, other than those specifically set forth in this Certificate of Incorporation.

(xv) The headings of the various subdivisions hereof are for convenience of reference only and shall not affect the interpretation of any of the provisions hereof.

(xvi) If any of the voting powers, preferences and relative participating, optional and other special rights of this Series and qualifications, limitations and restrictions thereof set forth herein is invalid, unlawful or incapable of being enforced by reason of any rule of law or public policy, all other voting powers, preferences and relative participating, optional and other special rights of this Series and qualifications, limitations and restrictions thereof set forth herein that can be given effect without the invalid, unlawful or unenforceable voting powers, preferences and relative participating, optional and other special rights of this Series and qualifications, limitations and restrictions thereof shall, nevertheless, remain in full force and effect, and no voting powers, preferences and relative participating, optional or other special rights of this Series and qualifications, limitations and restrictions thereof herein set forth shall be deemed dependent upon any other such voting powers, preferences and relative participating, optional or other special rights of this Series and qualifications, limitations and restrictions thereof unless so expressed herein.

(xvii) Shares of this Series that have been issued and reacquired in any manner, including shares purchased or exchanged or converted, shall (upon compliance with any applicable provisions of the laws of Delaware) have the status of authorized but unissued shares of preferred stock of the Corporation undesignated as to series and may be designated or redesignated and issued or reissued, as the case may be, as part of any series of preferred

stock of the Corporation, provided that any issuance of such shares as this Series must be in compliance with the terms hereof.

(xviii) If any certificates of shares of this Series shall be mutilated, lost, stolen or destroyed, the Corporation shall issue, in exchange and in substitution for and upon cancellation of the mutilated certificates of shares of this Series, or in lieu of and substitution for certificates of this Series lost, stolen or destroyed, a new certificate of this Series and of like tenor and representing an equivalent amount of shares of this Series, but only upon receipt of evidence of such loss, theft or destruction of such certificate of this Series and indemnity, if requested, satisfactory to the Corporation and the Transfer Agent. The Corporation is not required to issue any certificates representing shares of this Series on or after the Conversion Date. In place of the delivery of a replacement certificate following the Conversion Date, the Transfer Agent, upon delivery of the evidence and indemnity described above, will deliver shares of Common Stock pursuant to the terms of this Series evidenced by the certificate.

Site Location
Miller Rd
Miller Rd
Oakman Blvd

Ford, Steven

From: Ford, Steven
Sent: Sunday, July 19, 2015 6:15 PM
To: Piscitelli, Alexis
Subject: FW: NRC#1123092

Didn't know whether Mr. Casselberry and Mr. Adams need/want a copy of this or not.
I will leave that up to your discretion.

Thanks
Steve

-----Original Message-----
From: HQS-PF-fldr-NRC@uscg.mil [mailto:HQS-PF-fldr-NRC@uscg.mil]
Sent: Friday, July 17, 2015 4:12 PM
To: Ford, Steven
Subject: NRC#1123092

NATIONAL RESPONSE CENTER 1-800-424-8802
*** For Public Use ***
Information released to a third party shall comply with any
applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 1123092

INCIDENT DESCRIPTION

*Report taken at 16:03 on 17-JUL-15
Incident Type: FIXED
Incident Cause: EQUIPMENT FAILURE
Affected Area:
Incident occurred on 15-JUL-15 at 15:50 local incident time.
Affected Medium: OTHER / GROUND

SUSPECTED RESPONSIBLE PARTY

Organization: DOUBLE EAGLE STEEL COATING COMPANY
DEARBORN, MI 48120

INCIDENT LOCATION
3000 MILLER ROAD County: WAYNE
City: DEARBORN State: MI Zip: 48120

RELEASED MATERIAL(S)
CHRIS Code: NCC Official Material Name: NO CHRIS CODE
Also Known As: WASTE WATER
Qty Released: 100 GALLON(S)

DESCRIPTION OF INCIDENT

CALLER IS REPORTING A DISCHARGE OF WASTE WATER THAT WAS ACIDIC (BELOW A 1.8PH) FROM AN EQUALIZATION LINE DUE TO A PINHOLE CRACK IN THE FIBERGLASS PIPING. CALLER STATED THAT AMOUNT DISCHARGE WAS LESS THAN 100 GALLONS.

INCIDENT DETAILS

Package: N/A
Building ID:
Type of Fixed Object: WATER TREATMENT FACILITY
Power Generating Facility: NO
Generating Capacity:
Type of Fuel:
NPDES:
NPDES Compliance: UNKNOWN

IMPACT

Fire Involved: NO Fire Extinguished: UNKNOWN

INJURIES: NO Hospitalized: Empl/Crew: Passenger:
FATALITIES: NO Empl/Crew: Passenger: Occupant:
EVACUATIONS:NO Who Evacuated: Radius/Area:

Damages: NO

Closure Type	Description of Closure	Hours Closed	Direction of Closure
Air:	N		
Road:	N		Major Artery:N
Waterway:	N		
Track:			

Environmental Impact: NO
Media Interest: UNKNOWN Community Impact due to Material:

REMEDIAL ACTIONS

TWO PIGS DEPLOYED, SUCTION HOSE WAS USED TO REMOVE LIQUID FROM GROUND, CLEAN UP IS COMPLETED
Release Secured: YES
Release Rate:
Estimated Release Duration:

WEATHER

Weather: SUNNY, ºF

ADDITIONAL AGENCIES NOTIFIED

Federal:
State/Local: PEAS
State/Local On Scene:
State Agency Number:

NOTIFICATIONS BY NRC

CENTERS FOR DISEASE CONTROL (GRASP)
17-JUL-15 16:11
DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE)
17-JUL-15 16:11
U.S. EPA V (MAIN OFFICE)

FLD INTEL SUPPORT TEAM DETROIT (COMMAND CENTER)
17-JUL-15 16:11
MACKINAC COUNTY EMERGENCY MGMT (COMMAND CENTER)
17-JUL-15 16:11
MICHIGAN DEPT OF COMMUNITY HEALTH (HSEES)
17-JUL-15 16:11
MI INTELLIGENCE OPERATIONS CENTER (FUSION CENTER)
17-JUL-15 16:11
MI INTELLIGENCE OPERATIONS CENTER (CIP DESK)
17-JUL-15 16:11
NTL ENVMTL EMERG CENTRE CANADA (MAIN OFFICE)
17-JUL-15 16:11
NATIONAL INFRASTRUCTURE COORD CTR (MAIN OFFICE)
17-JUL-15 16:11
NOAA RPTS FOR MI (MAIN OFFICE)
17-JUL-15 16:11
NATIONAL RESPONSE CENTER HQ (AUTOMATIC REPORTS)
17-JUL-15 16:11
REPORTING PARTY (RP SUBMITTER)
17-JUL-15 16:11
OFFICE OF ENV. POLICY & COMPLIANCE (MAIN OFFICE)
17-JUL-15 16:11
MICHIGAN DEQ (MAIN OFFICE)
17-JUL-15 16:11
MICHIGAN DEQ (MAIN OFFICE 2)
17-JUL-15 16:11
USCG DISTRICT 9 (COMMAND CENTER)
17-JUL-15 16:11

ADDITIONAL INFORMATION

*** END INCIDENT REPORT #1123092 ***
Report any problems by calling 1-800-424-8802
PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil

DOUBLE EAGLE
STEEL COATING COMPANY

3000 Miller Rd
Dearborn, MI 48120

July 17, 2015

Ms. Jennifer Hazelton
Southeast Michigan District Office
27700 Donald Court
Warren, MI 48092

Re: Equalization Tank Influent Line Leak
NPDES Permit No. MI0044415

Dear Ms. Hazelton,

This letter is to inform you that Double Eagle Steel Coating Company had a release of Equalization Tank Influent Water on July 15, 2015 at approximately 4:00 p.m. The release occurred from a crack in the fiberglass line that runs up the side of the equalization tank. The material was from our process side "Waste Acid" sump and it had a pH of 1.8 in our lab.

This occurrence was reported by telephone at approximately 5:40 pm the same day. The estimated volume of water loss was somewhere between 50-100 gallons total and a majority of it was being collected as it was leaking.

Double Eagle shut the pumps down that feed this particular line, called in the appropriate repair personnel for the line, and brought in Industrial cleaning to clean up the water that went to ground. At no time was there risk of the material entering the storm sewer or leaving the property.

Industrial services removed approximately two inches of top soil in an area somewhat less than an 8X8 foot square as a reaction to the liquid to ground to ensure collection of material that may have not been collected via suction line.

Please do not hesitate to contact us if there is any additional information you would like on this subject.

Sincerely,

Steven Ford
Administration Manager
Double Eagle Steel Coating Company
(313)203-9836

DOUBLE EAGLE
STEEL COATING COMPANY

3000 Miller Rd
Dearborn, MI 48120

July 22, 2015

Ms. Lisa DiRado
Wayne County LEPC
10250 Middlebelt
Detroit , MI 48242

Re: Equalization Tank Influent Line Leak
10-Day Notification

Dear Ms. DiRado,

This letter is to inform you that Double Eagle Steel Coating Company had a release of Equalization Tank Influent Water on July 15, 2015 at approximately 4:00 p.m. The release occurred from a crack in a fiberglass line that runs up the side of the equalization tank at our Waste Water Treatment Plant. The material was from our process side "Waste Acid" sump and it had a pH of 1.8 in our lab.

The estimated volume of water loss was somewhere between 50-100 gallons total and a majority of it was being collected as it was leaking.

Double Eagle shut the pumps down that feed this particular line, called in the appropriate repair personnel for the line, and brought in Industrial cleaning to clean up the water that went to ground. At no time was there risk of the material entering the storm sewer or leaving the property. Likewise, all Personnel associated with the incident were fitted with appropriate Personal Protective Equipment.

Industrial services removed approximately two inches of top soil in an area somewhat less than an 8X8 foot square as a reaction to the liquid to ground to ensure collection of material that may have not been collected via suction line.

Please do not hesitate to contact us if there is any additional information you would like on this subject.

Sincerely,

Steven Ford
Administration Manager
Double Eagle Steel Coating Company
(313)203-9836

Entzminger, James

From: Alexis Piscitelli <APiscitelli@uss.com>
Sent: Friday, August 28, 2015 8:35 AM
To: Entzminger, James
Cc: tluciow; James R Gray
Subject: Request for Information - Double Eagle Steel

James,

As per our telephone conversation, U. S. Steel appreciates you providing additional time for us to make a full and accurate report. We will provide our report on or before October 2, 2015.

Thank you for your cooperation,
Alexis Piscitelli
Director, Environmental
U. S. Steel - Great Lakes Works

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 1 0 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Theodore Luciow
Plant Manager
Double Eagle Steel Coating Company
3000 Miller Road
Dearborn, Michigan 48120

Dear Mr. Luciow:

On August 18, 2015, the U.S. Environmental Protection Agency issued an Information Request to Double Eagle Steel Coating Company pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended, 42 U.S.C. § 9604(e). The Information Request was served on Double Eagle Steel Coating Company by certified mail on August 9, 2015. This Information Request required Double Eagle Steel Coating Company to provide certain documents and information within 20 days of receipt. Double Eagle Steel Coating Company submitted a response to the Information Request on September 30, 2015.

Please be advised that EPA finds to be deficient Double Eagle Steel Coating Company's response to items of EPA's August 18, 2015, Information Request. In particular, you did not provide adequate information regarding the weight of the chemical released. The EPA requests that Double Eagle Steel Coating Company provide a complete response to the question posed below within five (5) days of receipt of this letter.

What was the specific gravity of the waste water released on July 15, 2015, characterized as Resource Conservation and Recovery Act waste code D002? Please provide documentation to substantiate your answer.

You should mail your response to:

James Entzminger
Chemical Emergency Preparedness
and Prevention Section (SC-5J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

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You may, if you desire, assert a business confidentiality claim described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to Double Eagle Steel Coating Company.

Failure to comply with EPA's Information Request by not fully, truthfully and timely responding to all items of that request, or adequately justifying such failure to respond, may subject Double Eagle Steel Coating Company to an enforcement action seeking to compel compliance and collect penalties of up to $37,500 per day of noncompliance pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5). EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501 et seq.

If you should have any questions regarding this request, contact James Entzminger, Chemical Emergency Preparedness and Prevention Section, at (312) 886-4062.

Sincerely,

M. Cecilia Moore

M. Cecilia Moore, Chief
Enforcement and Compliance Assurance Branch

November 17, 2015

Mr. James Entzminger
Chemical Emergency Preparedness and Preventive Section
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

SUBJECT: United States Steel Corporation – Great Lakes Works
Double Eagle Steel Coating Company
November 10, 2015 Letter
Follow up to EPA's August 18, 2015 Information Request

Dear Mr. Entzminger,

On or about November 13, 2015, U. S. Steel – Great Lakes Works (U. S. Steel) Double Eagle Coating Company received a letter dated November 10, 2015 regarding the Information Request Response submitted by U. S. Steel on September 30, 2015. The letter inquired;

What was the specific gravity of the waste water released on July 15, 2015, characterized as Resource Conservation and Recovery Act waste code D002? Please provide documentation to substantiate you answer.

U. S. Steel does not have a measurement of the specific gravity of the waste water released on July 15, 2015, but U. S. Steel took additional steps to attempt to address the Department's question. On November 13, 2015, U. S. Steel took a sample of the waste water in the equalization tank at the waste water treatment facility at Double Eagle Steel Coating Company. This sample is representative of the waste water that would have leaked from the pipe on July 15, 2015. The specific gravity was analyzed by an outside laboratory ALS Environmental. The specific gravity of the waste water is 1.00. The lab test results and chain of custody sheets are attached for your review.

If you have any additional questions or concerns, please address any correspondence to Alexis Piscitelli at 1 Quality Drive, Ecorse, Michigan 48138.

I certify that based off information and belief formed after reasonable inquiry, the information provided in this response is true and correct to the best of my knowledge and information.

Sincerely,

James Gray
General Manager
U. S. Steel – Great Lakes Works

Alexis Piscitelli
Director, Environmental Control
U. S. Steel – Great Lakes Works

ALS Environmental

16-Nov-2015

Maryellen Przybylinski
Double Eagle Steel Coating Co.
3000 Miller Road
Dearborn, MI 48120

Re: **EQ Tank** Work Order: **1511844**

Dear Maryellen,

ALS Environmental received 1 sample on 14-Nov-2015 08:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested.

Sample results are compliant with NELAP standard requirements and QC results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 6.

If you have any questions regarding this report, please feel free to contact me.

Sincerely,

Joseph Ribar

Electronically approved by: Joseph Ribar

Joseph Ribar
Project Manager

Certificate No: MN 532786

ADDRESS 3352 128th Avenue Holland, Michigan 49424-9263 | PHONE (616) 399-6070 | FAX (616) 399-6185
ALS GROUP USA, CORP Part of the ALS Laboratory Group A Campbell Brothers Limited Company

Environmental www.alsglobal.com
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ALS Group USA, Corp

Date: 16-Nov-15

Client: Double Eagle Steel Coating Co.
Project: EQ Tank
Work Order: **1511844**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
1511844-01	EQ Tank	Liquid		11/13/2015 14:00	11/14/2015 08:00	☐

ALS Group USA, Corp

Date: *16-Nov-15*

Client: Double Eagle Steel Coating Co.
Project: EQ Tank
Sample ID: EQ Tank
Collection Date: 11/13/2015 02:00 PM

Work Order: 1511844
Lab ID: 1511844-01
Matrix: LIQUID

Analyses	Result	Qual	Report Limit	Units	Dilution Factor	Date Analyzed
SPECIFIC GRAVITY			**D5057-90**			Analyst: **MB**
Specific Gravity	**1.00**			**none**	1	11/16/2015 04:15 PM

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group USA, Corp

Date: 16-Nov-15

Client: Double Eagle Steel Coating Co.
Project: EQ Tank
WorkOrder: **1511844**

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte is present at an estimated concentration between the MDL and Report Limit
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL
X	Analyte was detected in the Method Blank between the MDL and PQL, sample results may exhibit background or reagent contamination at the observed level.

Acronym	Description
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
LOD	Limit of Detection (see MDL)
LOQ	Limit of Quantitation (see PQL)
MBLK	Method Blank
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PQL	Practical Quantitation Limit
RPD	Relative Percent Difference
TDL	Target Detection Limit
TNTC	Too Numerous To Count
A	APHA Standard Methods
D	ASTM
E	EPA
SW	SW-846 Update III

Units Reported	Description
none	

ALS Environmental

Cincinnati, OH +1 513 733 5336 | Fort Collins, CO +1 970 490 1511 | Houston, TX +1 281 530 5656 | Spring City, PA +1 610 948 4903 | South Charleston, WV +1 304 356 3168
Everett, WA +1 425 356 2600 | Holland, MI +1 616 399 6070 | Middletown, PA +1 717 944 5541 | Salt Lake City, UT +1 801 266 7700 | York, PA +1 717 505 5280

Chain of Custody Form

Page ____ of ____

COC ID: 25794

ALS Project Manager: | ALS Work Order #: 1511399

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name		A	Specific Gravity
Work Order		Project Number		B	
Company Name	DOUBLE EAGLE	Bill To Company		C	
Send Report To	Maeyellen	Invoice Attn		D	
Address		Address		E	
				F	
City/State/Zip		City/State/Zip		G	
Phone		Phone		H	
Fax		Fax		I	
e-Mail Address		e-Mail Address		J	

No.	Sample Description	Date	Time	Matrix	Preq.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	EQ TANK	11/13/15	1400	L	-	1	X										
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign:

Shipment Method:

Required Turnaround Time: (Check Box) ☐ Other ____ ☐ STD 10 Wk Days ☐ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by:	Date:	Time:	Received by:	Notes:
Relinquished by:	Date: 11/14/15	Time: 0800	Received by (Laboratory):	Cooler ID / Cooler Temp
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):	QC Package: (Check One Box Below)

☐ Level II Std QC ☐ TRRP Checklist
☐ Level III Std QC/Raw Data ☐ TRRP Level IV
☐ Level IV SW846/CLP
☐ Other ____

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

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ALS Group USA, Corp

Sample Receipt Checklist

Client Name: **DESCC** Date/Time Received: **14-Nov-15 08:00**

Work Order: **1511844** Received by: **JR**

Checklist completed by Diane Shaw (eSignature) 16-Nov-15 (Date) Reviewed by: Joseph Ribar (eSignature) 16-Nov-15 (Date)

Matrices: liquid
Carrier name: Courier

	Yes	No	Not Present
Shipping container/cooler in good condition?	☑	☐	☐
Custody seals intact on shipping container/cooler?	☐	☐	☑
Custody seals intact on sample bottles?	☐	☐	☑
Chain of custody present?	☑	☐	
Chain of custody signed when relinquished and received?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	
Sample(s) received on ice?	☑	☐	

Temperature(s)/Thermometer(s): 3.2c/3.2c SR2

Cooler(s)/Kit(s):

Date/Time sample(s) sent to storage: 11/14/2015 9:41:22 AM

	Yes	No		
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted	☑
Water - pH acceptable upon receipt?	☐	☐	N/A	☑
pH adjusted?	☐	☐	N/A	☑

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

CorrectiveAction:

(b) (5) Deliberative Process, (b) (7) (e) Disclosure would reveal an enforcement strategy or procedure

(b) (5) Deliberative Process, (b) (7) (e) Disclosure would reveal an enforcement strategy or procedure

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 1 0 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James R. Gray
General Manager
Great Lakes Works
United States Steel Corporation
No. 1 Quality Drive
Ecorse, Michigan 48229

Re: Notice of Intent to File Civil Administrative Complaint Against Double Eagle Steel Coating Company, Dearborn, Michigan

Dear Mr. Gray:

The U.S. Environmental Protection Agency plans to file an administrative complaint against Double Eagle Steel Coating Company (you). EPA will allege that you violated the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9603. The Complaint will allege that Double Eagle Steel Coating Company failed to immediately report a release of Resource Conservation and Recovery Act hazardous waste code D002 to the National Response Center. The release occurred on July 15, 2015. Based on information currently available to us, we plan to propose a penalty of $18,064.20 for this violation.

This letter is not a demand to pay a penalty. We will not ask you to pay a penalty until we file the complaint or a final order. Before filing the complaint, we are giving you the opportunity to present any information that you believe we should consider. Relevant information might include evidence that you did not violate the law; evidence that you relied on compliance assistance from EPA or a state agency; evidence that we identified the wrong party; or financial data bearing on your ability to pay a penalty.

If you believe that you will be unable to pay the $18,064.20 penalty because of financial reasons, or if you believe that there are financial facts and information which bear on your ability to pay a penalty, please submit the following information: (1) true, accurate and complete copies of the signed and filed federal income tax returns of Double Eagle Steel Coating Company for the most recent three years, including all schedules, forms and other attachments; (2) true, accurate and complete copies of Double Eagle Steel Coating Company's certified financial statements, preferably audited, for the most recent three years, including all balance sheets, income statements, statements of operations, statements of retained earnings, statements of cash flows, and all notes to each financial statement; and (3) true, accurate and complete copies of all company asset depreciation schedules, cumulative for the most recent three years. Please note

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that financial information is only required if you say that you cannot afford to pay a penalty. In addition, any information that you submit in response to this letter is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because this letter seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

You may consider as confidential the information you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information under 40 C.F.R. part 2, subpart B. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. part 2, subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to Double Eagle Steel Coating Company.

Please note that EPA may consider and use the information provided by you in a civil or criminal proceeding related to this matter.

Within 10 calendar days after you receive this letter, please send any response to:

Robert H. Smith
Associate Regional Counsel (C-14J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

If you have any questions please contact Robert H. Smith, Associate Regional Counsel, at (312) 886-0765.

Thank you for your prompt attention to this matter.

Sincerely,

for James Entzminger
Michael E. Hans, Chief
Chemical Emergency Preparedness
and Prevention Section

CHEMICAL EMERGENCY PREPAREDNESS AND PREVENTION SECTION
CORRESPONDENCE SIGN-OFF SHEET

DOUBLE EAGLE STEEL COATING COMPANY, DEARBORN, MICHIGAN

PRE-FILING / NOTICE OF INTENT

- [X] CERCLA
- [ ] EPCRA
- [ ] CERCLA & EPCRA
- [ ] RMP
- [ ] SPCC
- [ ] FRP

		Name	Initials	Date
1.	**CEPPS Staff** (SC-5J)	James Entzminger	JE	1/29/16
2.	**ORC Staff** (C-14J)	Robert H. Smith	RHS	2/18/16 Delay while on AL
3.	**ORC Section Chief** (C-14J)	Sandra Lee	SML	2.19.16
4.	**CEPP Section Chief** (SC-5J)	Michael Hans		

Comments:

Return To: James Entzminger # 6-4062 **Mail Code:** SC-5J

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Tracking Number: 70111150000026431228

Updated Delivery Day: Monday, February 22, 2016

Product & Tracking Information

Postal Product:

Features:
Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
February 22, 2016 , 7:18 am	**Delivered, To Agent**	**RIVER ROUGE, MI 48218**

Your item has been delivered to an agent at 7:18 am on February 22, 2016 in RIVER ROUGE, MI 48218.

February 22, 2016 , 6:12 am	Arrived at Unit	RIVER ROUGE, MI 48218
February 21, 2016 , 9:29 pm	Departed USPS Facility	DETROIT, MI 48233
February 20, 2016 , 4:57 pm	Arrived at USPS Facility	DETROIT, MI 48233
February 19, 2016 , 11:15 pm	Arrived at USPS Facility	BEDFORD PARK, IL 60499

Available Actions

Text Updates

Email Updates

Track Another Package

Tracking (or receipt) number

70111150000026431228

Track It

Manage Incoming Packages

Track all your packages from a dashboard.
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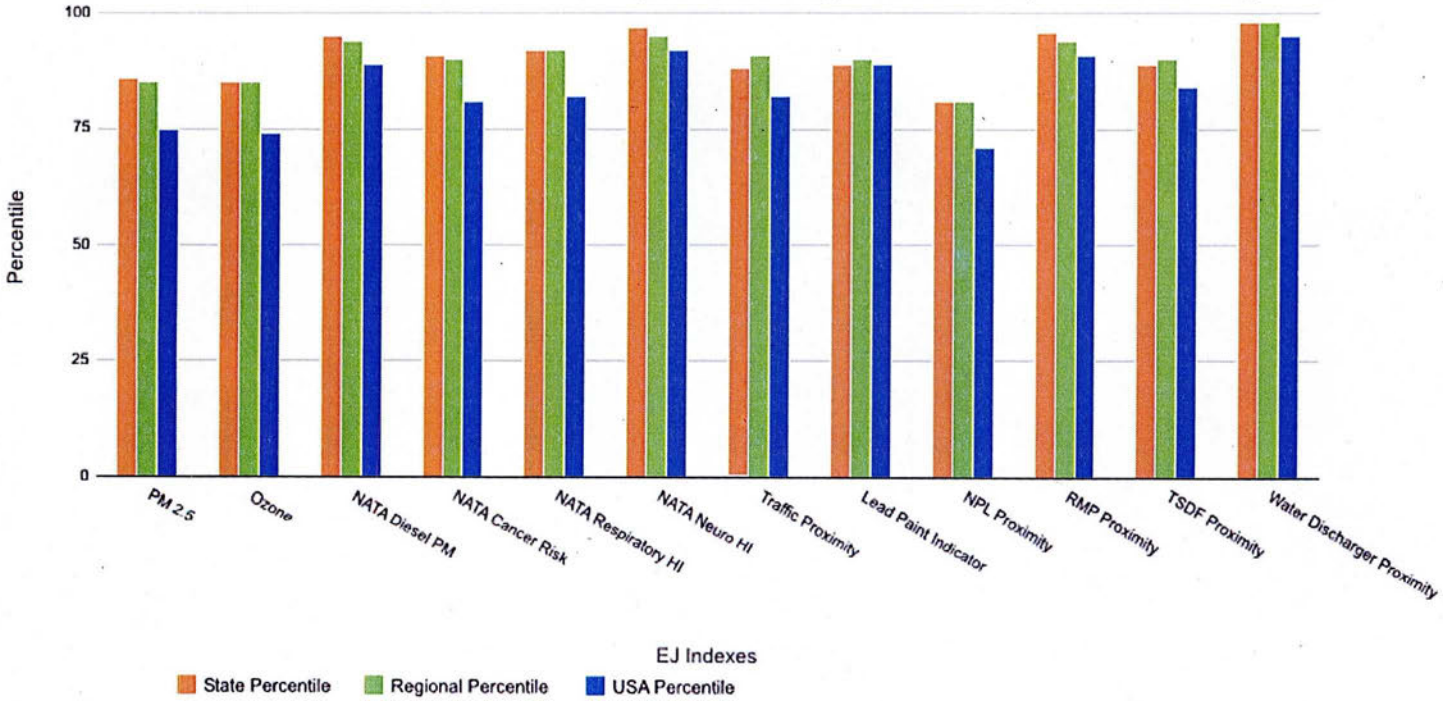
Search or Enter a Tracking Number

Save as PDF

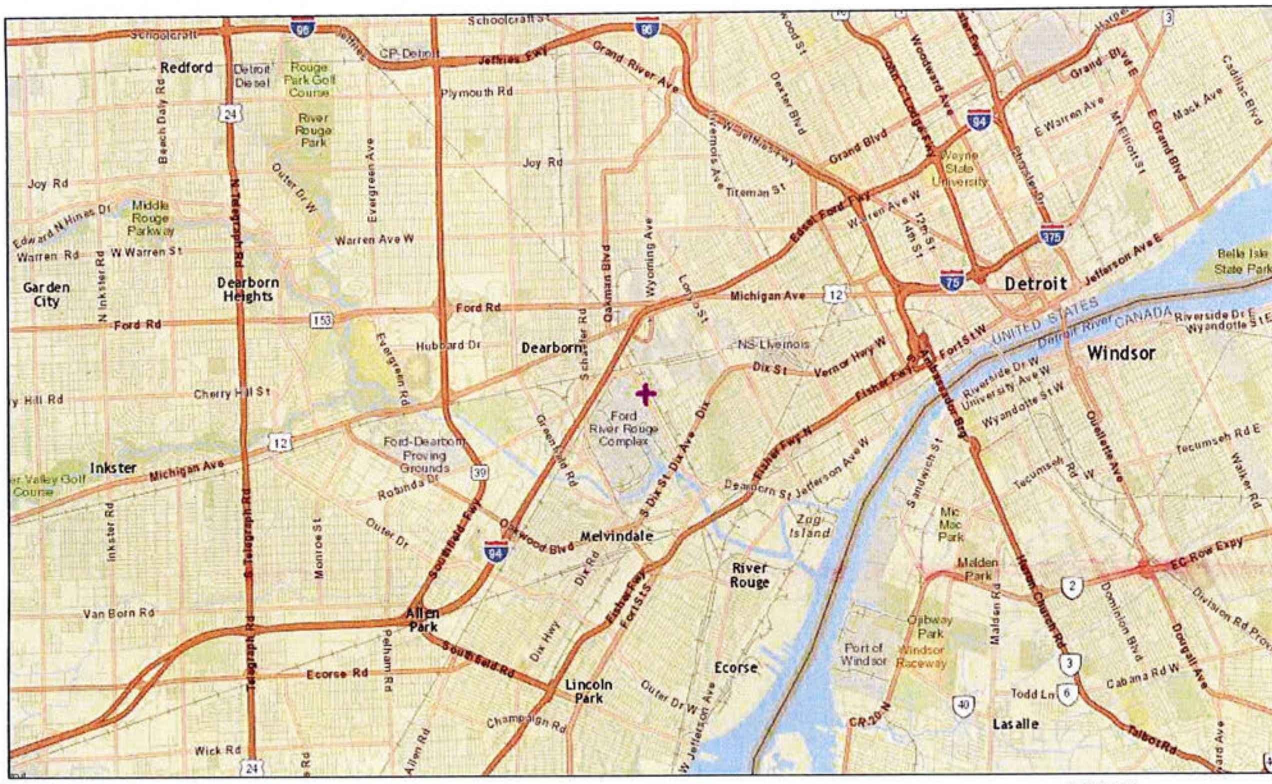
1 mile Ring Centered at 42.311708,-83.158454
MICHIGAN, EPA Region 5
Approximate Population: 4183
Double Eagle Steel Coating Company

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	86	85	75
EJ Index for Ozone	85	85	74
EJ Index for NATA Diesel PM	95	94	89
EJ Index for NATA Air Toxics Cancer Risk	91	90	81
EJ Index for NATA Respiratory Hazard Index	92	92	82
EJ Index for NATA Neurological Hazard Index	97	95	92
EJ Index for Traffic Proximity and Volume	88	91	82
EJ Index for Lead Paint Indicator	89	90	89
EJ Index for NPL Proximity	81	81	71
EJ Index for RMP Proximity	96	94	91
EJ Index for TSDF Proximity	89	90	84
EJ Index for Water Discharger Proximity	98	98	95

EJ Index for the Selected Area Compared to All People's Block Groups in the State/Region/US



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



February 19, 2016

+ Digitized Point

1:144,448

0 1.25 2.5 5 mi

0 2 4 8 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Selected Variables	Raw data	State Average	%ile in State	EPA Region Average	%ile in EPA Region	USA Average	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m^3)	11	9.75	99	10.8	58	9.78	76
Ozone (ppb)	45.1	44.7	44	44.4	57	46.1	42
NATA Diesel PM (µg/m^3)*	3.22	0.727	98	0.712	95-100th	0.824	95-100th
NATA Air Toxics Cancer Risk (risk per MM)*	90	43	99	42	95-100th	49	90-95th
NATA Respiratory Hazard Index*	4.2	1.5	98	1.5	95-100th	2.3	80-90th
NATA Neurological Hazard Index*	0.24	0.058	99	0.067	95-100th	0.063	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	130	79	82	69	86	110	79
Lead Paint Indicator (% pre-1960s housing)	0.81	0.39	86	0.4	87	0.3	92
NPL Proximity (site count/km distance)	0.026	0.095	25	0.086	29	0.096	30
RMP Proximity (facility count/km distance)	1.1	0.21	97	0.33	93	0.31	94
TSDF Proximity (facility count/km distance)	0.078	0.063	78	0.051	84	0.054	83
Water Discharger Proximity (count/km)	1.2	0.19	98	0.23	98	0.25	96
Demographic Indicators							
Demographic Index	48%	29%	82	28%	83	35%	72
Minority Population	14%	23%	54	24%	53	36%	32
Low Income Population	82%	35%	96	32%	97	34%	97
Linguistically Isolated Population	30%	2%	99	2%	98	5%	96
Population with Less Than High School Education	37%	11%	97	12%	96	14%	92
Population under Age 5	13%	6%	95	6%	94	7%	93
Population over Age 64	8%	14%	20	13%	23	13%	28

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: http:// www.epa.gov/ttn/atw/natamain/index.html.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental

United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800
Tel: 412 433 2855
Fax: 412 433 2811
E-mail: rfcasselberry@uss.com

Robert F. Casselberry
Senior Counsel

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. 7015 1520 0000 7824 6031

February 26, 2016

Robert H. Smith
Associate Regional Counsel (C-14J)
U. S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Subject: Notice of Intent to File Civil Administrative Complaint Against Double Eagle Steel Coating Company, Dearborn, Michigan

Mr. Smith,

Thank you for the opportunity to present information for your consideration of the matter above. U. S. Steel received your notice on February 23, 2016.

We have some initial questions about the amount of the proposed penalty. Was a penalty calculation worksheet and/or matrix used to calculate the amount? If so, would you share the values and assumptions used to make the calculations?

As you know, this incident was the subject of a CERCLA 104(e) information request sent by James Entzminger of the U. S. EPA Chemical and Emergency Preparedness and Prevention Section sent on August 18, 2015. The U. S. Steel response to that request was sent to Mr. Entzminger's attention on October 1, 2015. Most of the information I will be referring to in this letter was included in that response.

The main points U. S. Steel would like to present are:

1. On July 15, 2015 at 5:30 PM, immediately upon ascertaining that reportable quantity (RQ) release had occurred, U. S. Steel made immediate notice to the Michigan Pollution Emergency Alert System ("PEAS"). PEAS did not consider the nature of the incident sufficient to warrant any action on their part.

2. U. S. Steel personnel and contractors initiated an immediate remedial response on July 15th. No outside responders were required to address the situation. The amount of the release was determined to be less than 100 gallons of low pH

process water. No material entered sewer or storm sewer systems. All standing liquid on U. S. Steel property (approximately 20 gallons) was recovered. Impacted soil was excavated and properly disposed of. Please take note: there were no harmful effects to human health or the environment because of this release.

3. On July 17, 2015 at 4:30 PM, after an internal environmental review of the incident response, U. S. Steel personnel determined that the National Response Center ("NRC") should also have been notified of the incident. A call was made to the NRC to correct this oversight.

4. This is the first reportable quantity reporting issue to occur at the Double Eagle facility. There is no history of similar events at Double Eagle.

5. U. S. Steel RQ reporting protocols have been reviewed and employee contacts have been made to reinstruct and reinforce the protocols.

To summarize, U. S. Steel had an environmental notice and response system in place at the time of the incident. U. S. Steel promptly managed the remedial response without the need for Federal, State, or Local agency assistance. The incident itself was minor in nature. U. S. Steel made a voluntary disclosure of the late notice issue and has fully cooperated with the EPA in responding to inquiries.

U. S. Steel is willing to settle the matter, but believes that, because of the reasons stated, the penalty should be reduced to a nominal amount.

If you have any questions about this information or would like to discuss the matter further, please feel free to call me directly at the phone number listed above. I will be serving as the corporation's primary contact for this matter.

Sincerely,

Robert Casselberry

cc: A. S. Piscitelli — U. S. Steel, Great Lakes Works
H. P. Adams — U. S. Steel, Environmental Affairs

United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800
Phone: 412 433 2855
Fax: 412 433 2811
rfcasselberry@uss.com

Robert F. Casselberry
Senior Counsel

May 27, 2016

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT NO. 7015 1520 0000 7824 6062

Regional Hearing Clerk (E-19J)
U. S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Subject: In the Matter of United States Steel Corporation d/b/a
Double Eagle Steel Coating Company, Dearborn, Michigan
Docket No. CERCLA-05-2016-005
Billing Document No. 2751630B005

To Whom It May Concern:

In compliance with paragraph 28 of the above cited matter, a copy of the transmittal letter regarding the payment of a penalty in the amount of $13,548.15 is being sent to your attention. A copy of the check is enclosed.

If you have any questions about this issue, please contact me directly.

Sincerely,

Robert F. Casselberry
Enclosure
cc: James Entzminger (SC-5J) (w/enclosure) (sent by Certified Mail)
Chemical Emergency Preparedness and Prevention Section
U. S. EPA, Region 5
77 West Jackson Street
Chicago, IL 60604

Robert H. Smith (C-14) (w/enclosure) (sent by Certified Mail)
Office of Regional Counsel
U. S. EPA, Region 5
77 West Jackson Street
Chicago, IL 60604

A. S. Piscitelli (w/enclosure)
United States Steel Great Lakes Works

The Bank of New York Mellon
Treasury Services
Client Support Division
Room 154-1320
500 Ross Street
Pittsburgh, PA 15262-0001

VOID

S 000001 T1C9AG11 000001 E

00000001 01 SP 0.465 01 TR 00001 T1C9AG11 000000 001532

UNITED STATES STEEL CORPORATION
600 GRANT STREET
PITTSBURGH, PA 15219

PAGE: 1

PAYMENT SUMMARY

REF #:	CS-2109568	PHONE NUMBER:	888-426-0035
CHECK SERIAL #:	0518169568	CHECK DATE:	05/18/16

Attached please find a cashier's check 0518169568 from The Bank of New York Mellon in the amount of $13,548.15 made payable to EPA HAZARDOUS SUBSTANCE SUPERFUND as requested by Angie Ocilka from UNITED STATES STEEL CORP on 05/18/16.

If you have any questions or comments, please call your regular customer service contact or:

1-888-426-0035 between the hours of 8:00 a.m. and 6:00 p.m. EST

When calling, please refer to case number CS-2109568. Thank you for your business.

Treasury Services
Client Support Division
The Bank of New York Mellon

(Detach Here)

THE BANK OF NEW YORK MELLON
Treasury Services
Client Support Cashier's Checking Account

Cashier's Check

60-160/433

CAFO Doc#CERCLA-05-2016-0005 Bill Doc#2751630 B005

[redacted]	[redacted]	[redacted]
CS-2109568	05/18/2016	0518169568

PAY...THIRTEEN THOUSAND FIVE HUNDRED FORTY EIGHT DOLLARS 15 CENTS

$****13,548.15

TO THE ORDER OF: EPA HAZARDOUS SUBSTANCE SUPERFUND

VOID

Michael G. Kowalski

THE BANK OF NEW YORK MELLON
PITTSBURGH, PENNSYLVANIA

(b) (6) [redacted] [redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 29 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert F. Casselberry
Senior Counsel
United States Steel Corporation
600 Grant Street, Room 1500
Pittsburgh, PA 15219

Re: United States Steel Corporation d/b/a Double Eagle Steel Coating Operations, Dearborn, Michigan, Consent Agreement and Final Order, Docket No. **CERCLA-05-2016-0005**

Dear Mr. Casselberry:

Enclosed please find a copy of the fully executed Consent Agreement and Final Order (CAFO) in resolution of the above case. The U.S. Environmental Protection Agency has filed the original CAFO with the Regional Hearing Clerk on April 29, 2016.

Please have your client pay the Comprehensive Environmental Response, Compensation and Liability Act civil penalty in the amount of $13,548.15 in the manner prescribed in paragraph 27, and reference your check with the billing document number **2751630B005** and the docket number **CERCLA-05-2016-0005**.

Your client's payment is due on May 31, 2016.

Please feel free to contact James Entzminger at (312) 886-4062 if you have any questions regarding the enclosed documents. Please direct any legal questions to Robert H. Smith, Associate Regional Counsel, at (312) 886-0765. Thank you for your assistance in resolving this matter.

Sincerely,

Michael E. Hans, Chief
Chemical Emergency Preparedness
and Prevention Section

Enclosure

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No.** CERCLA-05-2016-0005
	)	
United States Steel Corporation d/b/a Double Eagle Steel Coating Company Dearborn, Michigan,	)	**Proceeding to Assess a Civil Penalty Under Section 109(b) of the Comprehensive Environmental Response, Compensation and Liability Act**
Respondent.	)	

REGIONAL HEARING CLERK
RECEIVED
APR 29 2016
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5

Consent Agreement and Final Order
Preliminary Statement

1. This is an administrative action commenced and concluded under Section 109(b) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. § 9609(b), and Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules) as codified at 40 C.F.R. Part 22.

2. The Complainant is, by lawful delegation, the Chief of the Enforcement and Compliance Assurance Branch, Superfund Division, United States Environmental Protection Agency (U.S. EPA), Region 5.

3. Respondent is United States Steel Corporation doing business as Double Eagle Steel Coating Company, a corporation doing business in the State of Michigan.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and the terms of the CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

Statutory and Regulatory Background

9. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), requires any person in charge of a facility to immediately notify the National Response Center (NRC) as soon as that person has knowledge of any release of a hazardous substance from the facility in an amount equal to or greater than the reportable quantity of the hazardous substance.

10. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), provides a mechanism to alert federal agencies that a response action may be necessary to prevent deaths or injuries to emergency responders, facility personnel and the local community. A delay or failure to notify could seriously hamper the government's response to an emergency and pose serious threats to human health and the environment.

11. Section 109(b) of CERCLA, 42 U.S.C. § 9609(b), authorizes U.S. EPA to assess a civil penalty of up to $25,000 per day of violation of CERCLA Section 103. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note, and its implementing regulations at 40 C.F.R. Part 19 increased these statutory maximum penalties to $32,500 per day of violation that occurred after March 15, 2004 through January 12, 2009 and to $37,500 per day of violation for violations that occurred after January 12, 2009.

Factual Allegations and Alleged Violations

12. Respondent is a "person" as that term is defined under Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

13. At all times relevant to this CAFO, Respondent was in charge of the facility located at 3000 Miller Road, Dearborn, Michigan (facility).

14. Respondent's facility consists of a building, structure, installation, equipment, pipe or pipeline, storage container, or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located.

15. Respondent's facility is a "facility" as that term is defined under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

16. Resource Conservation and Recovery Act (RCRA) hazardous waste code D002 is a "hazardous substance" as that term is defined under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

17. RCRA hazardous waste code D002 has a reportable quantity of 100 pounds, as indicated at 40 C.F.R. Part 302, Table 302.4.

18. On July 15, 2015, at or about 3:45 p.m., a release occurred from Respondent's facility of approximately 833.7 pounds of RCRA hazardous waste code D002 (the release).

19. In a 24 hour time period, the release of RCRA hazardous waste code D002 exceeded 100 pounds.

20. During the release, approximately 833.7 pounds of RCRA hazardous waste code D002 spilled, leaked, discharged, or escaped, into the land surface.

21. The release is a "release" as that term is defined under Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

22. Respondent had knowledge of the release on July 15, 2015, at approximately 3:45 p.m.

23. Respondent notified the NRC of the release on July 17, 2015, at 4:03 p.m.

24. Respondent did not immediately notify the NRC as soon as Respondent had knowledge of the release.

25. Respondent's failure to immediately notify the NRC of the release is a violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

Civil Penalty

26. Complainant has determined that an appropriate civil penalty to settle this action is $13,548.15 for the CERCLA violation. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violation, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violation and any other matters as justice may require. Complainant also considered U.S. EPA's Enforcement Response Policy for Sections 304, 311 and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response Compensation and Liability Act, dated September 30, 1999 (EPCRA/CERCLA Enforcement Response Policy). The proposed penalty of $18,064.20 from U.S. EPA's February 19, 2016 Notice of Intent to File Civil Administrative Complaint letter was reduced by 25% to $13,548.15 based on Respondent's cooperation and quick settlement.

27. Within 30 days after the effective date of this CAFO, Respondent must pay a $13,548.15 civil penalty for the CERCLA violation. Respondent must pay the penalty by sending a cashier's or certified check, payable to "EPA Hazardous Substance Superfund," to:

U.S. Environmental Protection Agency
Superfund Payments
Cincinnati Finance Center
P.O. Box 979076
St. Louis, MO 63197-9000

for checks sent by express mail by sending a cashier's or certified check, payable to "EPA Hazardous Substance Superfund," to:

U.S. Bank
Government Lockbox 979076 U.S. EPA Superfund Payments
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, MO 63101

The check must note the following: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, the docket number of this CAFO and the billing document number **2751630B005**.

28. A transmittal letter, stating Respondent's name, the case name, Respondent's complete address, the case docket number and the billing document number, if any, must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

James Entzminger (SC-5J)
Chemical Emergency Preparedness
and Prevention Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Robert H. Smith (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

29. This civil penalty is not deductible for federal tax purposes.

30. If Respondent does not timely pay the civil penalty, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States enforcement expenses for the collection action. The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

31. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a $15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, U.S. EPA will assess a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

32. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

33. This CAFO does not affect the rights of U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

34. Respondent certifies that it is complying with Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

35. This CAFO does not affect Respondent's responsibility to comply with CERCLA, and other applicable federal, state and local laws and regulations.

36. This CAFO is a "final order" for purposes of U.S. EPA's EPCRA/CERCLA Enforcement Response Policy.

37. The terms of this CAFO bind Respondent and its successors and assigns.

38. Each person signing this consent agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

39. Each party agrees to bear its own costs and attorney's fees in this action.

40. This CAFO constitutes the entire agreement between the parties.

United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Respondent

1 Apr 16
Date

James R. Gray
Executive
United States Steel Corporation

4/1/2016
Date

Robert F. Casselberry
Senior Counsel
United States Steel Corporation

U.S. Environmental Protection Agency, Complainant

04/27/2016
Date

M. Cecilia Moore
M. Cecilia Moore, Chief
Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5

4-28-16
Date

Richard C Karl
Richard C. Karl, Director
Superfund Division
U.S. Environmental Protection Agency
Region 5

In the Matter of: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan
Docket No. CERCLA-05-2016-0005

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

4/29/16
Date

Robert A. Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5

In the Matter of: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan
Docket No. CERCLA-05-2016-0005

Certificate of Service

I certify that I sent a true and correct copy of the foregoing Consent Agreement and Final Order, which was filed on April 29, 2016 in the following manner to the addressees:

Copy by Certified Mail
Return Receipt Requested:

Robert F. Casselberry
Senior Counsel
United States Steel Corporation
600 Grant Street, Room 1500
Pittsburgh, PA 15219

Copy by E-mail to
Attorney for Complainant: Robert H. Smith
Smith.roberth@epa.gov

Copy by E-mail to
Regional Judicial Officer: Ann Coyle
Coyle.ann@epa.gov

Dated: April 29, 201

L Whitehead
LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5

CERTIFIED MAIL RECEIPT NUMBER(S): 7011 1150 0000 2640 7063

(b) (5) Deliberative-Attorney Work Product

[redacted]

cc: Captain Christopher A. Kelenske, Chairperson (w/ enclosure)
State Emergency Response Commission
EMHSD/Michigan Department of State Police
Post Office Box 30634
Lansing, Michigan 48909

Michael Young (w/ enclosure)
State Emergency Response Commission
Michigan Department of Environmental Quality
Post Office Box 30457
Lansing, Michigan 48909

SECTION II: OECA ISSUES (Non-Confidential)

EPA Resolves CERCLA Section 103 Violation by United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan.

On _____, EPA filed a Consent Agreement and Final Order (CAFO) commencing and concluding a CERCLA enforcement action against United States Steel Corporation d/b/a Double Eagle Steel Coating Company (Double Eagle). Double Eagle produces electrogalvanized, or EG, products in Dearborn, Michigan. The CAFO alleges a violation for failure to immediately notify the NRC of a release of 833.7 pounds of RCRA hazardous waste code D002 in violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a). Pursuant to the CAFO, Double Eagle will pay a civil penalty of $13,548.15 within 30 days of the effective date of the CAFO.

Contact: Robert H. Smith, ORC, 312-886-0765 and James Entzminger, Superfund Division, 312-886-4062

(b) (5) Deliberative - Attorney Work Product

[redacted]

Approve: _____ 3/29/2016
T. Leverett Nelson — Date

Disapprove: _____ _____
T. Leverett Nelson — Date

bcc: Regional Hearing Clerk, (E-19J)
U.S. EPA Region 5

Robert H. Smith, (C-14J) (w/ enclosure)

Ann Coyle, (C-14J)
Regional Judicial Officer

FOIA File

File Copy (to originator)

Office of the
REGIONAL ADMINISTRATOR

EPA
Region 5
77 W Jackson Blvd.
Chgo., IL - 60604
Illinois Indiana Michigan
Minnesota Ohio Wisconsin

Correspondence for RA's Signature

Type of Document: **CAFO**

Name of Document: **DOUBLE EAGLE STEEL COATING COMPANY, DEARBORN, MICHIGAN**

Date Rec'd in ORA: **04/28/2016** *From:* **SF**

Contact Name: **BERTANNA LOUIE** *Phone:* **6-4844**

DATE	NAME	INITIALS
4/29	Ronna Beckmann (AL/R5-C)	
	Denise Fortin (AL/R5-C)	
	Eileen Deamer (AL/R5-C)	
	Cheryl L. Newton (Acting Deputy Regional Administrator)	
4/29/16	Robert A. Kaplan (Acting Regional Administrator)	

Correction Required? ○ Yes ○ No

Remarks:

CHEMICAL EMERGENCY PREPAREDNESS AND PREVENTION SECTION
CORRESPONDENCE SIGN-OFF SHEET

DOUBLE EAGLE STEEL COATING COMPANY, DEARBORN, MICHIGAN

CERCLA / EPCRA	RMP	SPCC / FRP
[X] Consent Agreement	[ ] Consent Agreement	[ ] Consent Agreement
[ ] Streamline Settlement		

		Name	Initials	Date
1.	CEPPS Staff with ORC Staff Concurrence (SC-5J)	James Entzminger Robert H. Smith	JE	3/18/16
2.	CEPPS Chief (SC-5J) (3-day turnaround)	Mick Hans	MH	3-21-16
3.	ORC Staff (C-14J)	Robert H. Smith	RHS	3/24/16
4.	ORC Section Chief (C-14J)	Sandra Lee	SM	3.25.16
5.	Regional Counsel (C-14J)		See WAR Left Side	

ORC Staff Mails to Respondent & Receives Signed CAFO Back

6.	ORC Staff – 2nd review (C-14J)	Robert H. Smith	RHS	4/12/16
7.	CEPPS Staff (SC-5J)	James Entzminger	JE	4/13/16

CEPPS Staff Sends Electronic Version of Memo to RA & Certificate of Service to ECAB Student Aide & SFDIO MH 4-22-16

8.	ECAB Chief (SC-5J) (3-day turnaround)	Cecilia Moore	CM	4/27/16
9.	SFD Director (S-6J)	Richard C. Karl	RCK	4-28-16
10.	Acting Regional Administrator (R-19J)	Robert Kaplan		
11.	Regional Hearing Clerk (R-19-J)	LaDawn Whitehead		

Comments: Please send scan of final, signed CAFO to Jarrah Sanders for distribution to originator, CCs, and BCCs. ~~The CAFO is printed on both sides of the paper~~

Return Package To: Jarrah Sanders # 6-6610 **Mail Code:** SC-5J

United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800
Phone: 412 433 2855
Fax: 412 433 2811
rfcasselberry@uss.com

Robert F. Casselberry
Senior Counsel

April 13, 2016

Via Certified Mail
Return Receipt Requested
No. 7015 1520 0000 7824 6604

Robert H. Smith
Associate Regional Counsel
U.S. EPA
77 W. Jackson Blvd. (C-14J)
Chicago, IL 60604

Subject: Double Eagle Settlement

Dear Rob,

Please find enclosed the original signature settlement agreement.

If you have any questions about the information contained in this letter, please feel free to call me.

Sincerely,

Robert F. Casselberry

Enclosure

Docs# 492808

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No.**
	)	
United States Steel Corporation d/b/a Double Eagle Steel Coating Company Dearborn, Michigan,	)	**Proceeding to Assess a Civil Penalty Under Section 109(b) of the Comprehensive Environmental Response, Compensation and Liability Act**
	)	
Respondent.		

Consent Agreement and Final Order
Preliminary Statement

1. This is an administrative action commenced and concluded under Section 109(b) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. § 9609(b), and Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules) as codified at 40 C.F.R. Part 22.

2. The Complainant is, by lawful delegation, the Chief of the Enforcement and Compliance Assurance Branch, Superfund Division, United States Environmental Protection Agency (U.S. EPA), Region 5.

3. Respondent is United States Steel Corporation doing business as Double Eagle Steel Coating Company, a corporation doing business in the State of Michigan.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and the terms of the CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

Statutory and Regulatory Background

9. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), requires any person in charge of a facility to immediately notify the National Response Center (NRC) as soon as that person has knowledge of any release of a hazardous substance from the facility in an amount equal to or greater than the reportable quantity of the hazardous substance.

10. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), provides a mechanism to alert federal agencies that a response action may be necessary to prevent deaths or injuries to emergency responders, facility personnel and the local community. A delay or failure to notify could seriously hamper the government's response to an emergency and pose serious threats to human health and the environment.

11. Section 109(b) of CERCLA, 42 U.S.C. § 9609(b), authorizes U.S. EPA to assess a civil penalty of up to $25,000 per day of violation of CERCLA Section 103. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note, and its implementing regulations at 40 C.F.R. Part 19 increased these statutory maximum penalties to $32,500 per day of violation that occurred after March 15, 2004 through January 12, 2009 and to $37,500 per day of violation for violations that occurred after January 12, 2009.

Factual Allegations and Alleged Violations

12. Respondent is a "person" as that term is defined under Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

13. At all times relevant to this CAFO, Respondent was in charge of the facility located at 3000 Miller Road, Dearborn, Michigan (facility).

14. Respondent's facility consists of a building, structure, installation, equipment, pipe or pipeline, storage container, or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located.

15. Respondent's facility is a "facility" as that term is defined under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

16. Resource Conservation and Recovery Act (RCRA) hazardous waste code D002 is a "hazardous substance" as that term is defined under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

17. RCRA hazardous waste code D002 has a reportable quantity of 100 pounds, as indicated at 40 C.F.R. Part 302, Table 302.4.

18. On July 15, 2015, at or about 3:45 p.m., a release occurred from Respondent's facility of approximately 833.7 pounds of RCRA hazardous waste code D002 (the release).

19. In a 24 hour time period, the release of RCRA hazardous waste code D002 exceeded 100 pounds.

20. During the release, approximately 833.7 pounds of RCRA hazardous waste code D002 spilled, leaked, discharged, or escaped, into the land surface.

21. The release is a "release" as that term is defined under Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

22. Respondent had knowledge of the release on July 15, 2015, at approximately 3:45 p.m.

23. Respondent notified the NRC of the release on July 17, 2015, at 4:03 p.m.

24. Respondent did not immediately notify the NRC as soon as Respondent had knowledge of the release.

25. Respondent's failure to immediately notify the NRC of the release is a violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

Civil Penalty

26. Complainant has determined that an appropriate civil penalty to settle this action is $13,548.15 for the CERCLA violation. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violation, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violation and any other matters as justice may require. Complainant also considered U.S. EPA's Enforcement Response Policy for Sections 304, 311 and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response Compensation and Liability Act, dated September 30, 1999 (EPCRA/CERCLA Enforcement Response Policy). The proposed penalty of $18,064.20 from U.S. EPA's February 19, 2016 Notice of Intent to File Civil Administrative Complaint letter was reduced by 25% to $13,548.15 based on Respondent's cooperation and quick settlement.

27. Within 30 days after the effective date of this CAFO, Respondent must pay a $13,548.15 civil penalty for the CERCLA violation. Respondent must pay the penalty by sending a cashier's or certified check, payable to "EPA Hazardous Substance Superfund," to:

U.S. Environmental Protection Agency
Superfund Payments
Cincinnati Finance Center
P.O. Box 979076
St. Louis, MO 63197-9000

for checks sent by express mail by sending a cashier's or certified check, payable to "EPA Hazardous Substance Superfund," to:

U.S. Bank
Government Lockbox 979076 U.S. EPA Superfund Payments
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, MO 63101

The check must note the following: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, the docket number of this CAFO and the billing document number

_____.

28. A transmittal letter, stating Respondent's name, the case name, Respondent's complete address, the case docket number and the billing document number, if any, must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

James Entzminger (SC-5J)
Chemical Emergency Preparedness
and Prevention Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Robert H. Smith (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

29. This civil penalty is not deductible for federal tax purposes.

30. If Respondent does not timely pay the civil penalty, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States enforcement expenses for the collection action. The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

31. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a $15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, U.S. EPA will assess a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

32. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

33. This CAFO does not affect the rights of U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

34. Respondent certifies that it is complying with Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

35. This CAFO does not affect Respondent's responsibility to comply with CERCLA, and other applicable federal, state and local laws and regulations.

36. This CAFO is a "final order" for purposes of U.S. EPA's EPCRA/CERCLA Enforcement Response Policy.

37. The terms of this CAFO bind Respondent and its successors and assigns.

38. Each person signing this consent agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

39. Each party agrees to bear its own costs and attorney's fees in this action.

40. This CAFO constitutes the entire agreement between the parties.

United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Respondent

1 Apr 16
Date

James R. Gray
Executive
United States Steel Corporation

4/1/2016
Date

Robert F. Casselberry
Senior Counsel
United States Steel Corporation

U.S. Environmental Protection Agency, Complainant

Date	M. Cecilia Moore, Chief Enforcement and Compliance Assurance Branch U.S. Environmental Protection Agency Region 5
Date	Richard C. Karl, Director Superfund Division U.S. Environmental Protection Agency Region 5

In the Matter of: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan
Docket No. _____

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

_____
Date

_____
Robert A. Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5

In the Matter of: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan
Docket No. _____

Certificate of Service

I certify that I sent a true and correct copy of the foregoing Consent Agreement and Final Order, which was filed on _____ in the following manner to the addressees:

Copy by Certified Mail
Return Receipt Requested:

Robert F. Casselberry
Senior Counsel
United States Steel Corporation
600 Grant Street, Room 1500
Pittsburgh, PA 15219

Copy by E-mail to
Attorney for Complainant: Robert H. Smith
Smith.roberth@epa.gov

Copy by E-mail to
Regional Judicial Officer: Ann Coyle
Coyle.ann@epa.gov

Dated: _____

_____
LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5

CERTIFIED MAIL RECEIPT NUMBER(S): _____

SECTION II: OECA ISSUES (Non-Confidential)

EPA Resolves CERCLA Section 103 Violation by United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan.

On _____, EPA filed a Consent Agreement and Final Order (CAFO) commencing and concluding a CERCLA enforcement action against United States Steel Corporation d/b/a Double Eagle Steel Coating Company (Double Eagle). Double Eagle produces electrogalvanized, or EG, products in Dearborn, Michigan. The CAFO alleges a violation for failure to immediately notify the NRC of a release of 833.7 pounds of RCRA hazardous waste code D002 in violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a). Pursuant to the CAFO, Double Eagle will pay a civil penalty of $13,548.15 within 30 days of the effective date of the CAFO.

Contact: Robert H. Smith, ORC, 312-886-0765 and James Entzminger, Superfund Division, 312-886-4062

(b) (5) Deliberative - Attorney Work Product

[redacted]

Approve: _____ 3/29/2016
T. Leverett Nelson Date

Disapprove: _____ _____
T. Leverett Nelson Date

PENALTY CALCULATION WORKSHEET

(b)(5) Deliberative Process; (b)(5) Deliberative-Attorney work product; (b)(5) Deliberative-Attorney Client product; (b)(7)(a) Could reasonably be expected to interfere with enforcement proceedings ; (b)(7)(e) Would disclose techniques and procedures for law enforcement, investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions

[redacted]

(b)(5) Deliberative Process; (b)(5) Deliberative-Attorney work product; (b)(5) Deliberative-Attorney Client product; (b)(7)(a) Could reasonably be expected to interfere with enforcement proceedings ; (b)(7)(e) Would disclose techniques and procedures for law enforcement, investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions

(b)(5) Deliberative Process; (b)(5) Deliberative-Attorney work product; (b)(5) Deliberative-Attorney Client product; (b)(7)(a) Could reasonably be expected to interfere with enforcement proceedings ; (b)(7)(e) Would disclose techniques and procedures for law enforcement, investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions

United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800
Phone: 412 433 2855
Fax: 412 433 2811
rfcasselberry@uss.com

Robert F. Casselberry
Senior Counsel

April 13, 2016

Via Certified Mail
Return Receipt Requested
No. 7015 1520 0000 7824 6604

Robert H. Smith
Associate Regional Counsel
U.S. EPA
77 W. Jackson Blvd. (C-14J)
Chicago, IL 60604

Subject: Double Eagle Settlement

Dear Rob,

Please find enclosed the original signature settlement agreement.

If you have any questions about the information contained in this letter, please feel free to call me.

Sincerely,

Robert F. Casselberry

Enclosure

Docs# 492808

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No.**
	)	
United States Steel Corporation d/b/a Double Eagle Steel Coating Company Dearborn, Michigan,	)	**Proceeding to Assess a Civil Penalty Under Section 109(b) of the Comprehensive Environmental Response, Compensation and Liability Act**
	)	
Respondent.		

Consent Agreement and Final Order
Preliminary Statement

1. This is an administrative action commenced and concluded under Section 109(b) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. § 9609(b), and Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules) as codified at 40 C.F.R. Part 22.

2. The Complainant is, by lawful delegation, the Chief of the Enforcement and Compliance Assurance Branch, Superfund Division, United States Environmental Protection Agency (U.S. EPA), Region 5.

3. Respondent is United States Steel Corporation doing business as Double Eagle Steel Coating Company, a corporation doing business in the State of Michigan.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and the terms of the CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

Statutory and Regulatory Background

9. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), requires any person in charge of a facility to immediately notify the National Response Center (NRC) as soon as that person has knowledge of any release of a hazardous substance from the facility in an amount equal to or greater than the reportable quantity of the hazardous substance.

10. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), provides a mechanism to alert federal agencies that a response action may be necessary to prevent deaths or injuries to emergency responders, facility personnel and the local community. A delay or failure to notify could seriously hamper the government's response to an emergency and pose serious threats to human health and the environment.

11. Section 109(b) of CERCLA, 42 U.S.C. § 9609(b), authorizes U.S. EPA to assess a civil penalty of up to $25,000 per day of violation of CERCLA Section 103. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note, and its implementing regulations at 40 C.F.R. Part 19 increased these statutory maximum penalties to $32,500 per day of violation that occurred after March 15, 2004 through January 12, 2009 and to $37,500 per day of violation for violations that occurred after January 12, 2009.

Factual Allegations and Alleged Violations

12. Respondent is a "person" as that term is defined under Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

13. At all times relevant to this CAFO, Respondent was in charge of the facility located at 3000 Miller Road, Dearborn, Michigan (facility).

14. Respondent's facility consists of a building, structure, installation, equipment, pipe or pipeline, storage container, or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located.

15. Respondent's facility is a "facility" as that term is defined under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

16. Resource Conservation and Recovery Act (RCRA) hazardous waste code D002 is a "hazardous substance" as that term is defined under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

17. RCRA hazardous waste code D002 has a reportable quantity of 100 pounds, as indicated at 40 C.F.R. Part 302, Table 302.4.

18. On July 15, 2015, at or about 3:45 p.m., a release occurred from Respondent's facility of approximately 833.7 pounds of RCRA hazardous waste code D002 (the release).

19. In a 24 hour time period, the release of RCRA hazardous waste code D002 exceeded 100 pounds.

20. During the release, approximately 833.7 pounds of RCRA hazardous waste code D002 spilled, leaked, discharged, or escaped, into the land surface.

21. The release is a "release" as that term is defined under Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

22. Respondent had knowledge of the release on July 15, 2015, at approximately 3:45 p.m.

23. Respondent notified the NRC of the release on July 17, 2015, at 4:03 p.m.

24. Respondent did not immediately notify the NRC as soon as Respondent had knowledge of the release.

25. Respondent's failure to immediately notify the NRC of the release is a violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a)..

Civil Penalty

26. Complainant has determined that an appropriate civil penalty to settle this action is $13,548.15 for the CERCLA violation. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violation, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violation and any other matters as justice may require. Complainant also considered U.S. EPA's Enforcement Response Policy for Sections 304, 311 and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response Compensation and Liability Act, dated September 30, 1999 (EPCRA/CERCLA Enforcement Response Policy). The proposed penalty of $18,064.20 from U.S. EPA's February 19, 2016 Notice of Intent to File Civil Administrative Complaint letter was reduced by 25% to $13,548.15 based on Respondent's cooperation and quick settlement.

27. Within 30 days after the effective date of this CAFO, Respondent must pay a $13,548.15 civil penalty for the CERCLA violation. Respondent must pay the penalty by sending a cashier's or certified check, payable to "EPA Hazardous Substance Superfund," to:

U.S. Environmental Protection Agency
Superfund Payments
Cincinnati Finance Center
P.O. Box 979076
St. Louis, MO 63197-9000

for checks sent by express mail by sending a cashier's or certified check, payable to "EPA Hazardous Substance Superfund," to:

U.S. Bank
Government Lockbox 979076 U.S. EPA Superfund Payments
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, MO 63101

The check must note the following: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, the docket number of this CAFO and the billing document number

_____.

28. A transmittal letter, stating Respondent's name, the case name, Respondent's complete address, the case docket number and the billing document number, if any, must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

James Entzminger (SC-5J)
Chemical Emergency Preparedness
and Prevention Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Robert H. Smith (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

29. This civil penalty is not deductible for federal tax purposes.

30. If Respondent does not timely pay the civil penalty, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States enforcement expenses for the collection action. The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

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General Provisions

32. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

33. This CAFO does not affect the rights of U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

34. Respondent certifies that it is complying with Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

35. This CAFO does not affect Respondent's responsibility to comply with CERCLA, and other applicable federal, state and local laws and regulations.

36. This CAFO is a "final order" for purposes of U.S. EPA's EPCRA/CERCLA Enforcement Response Policy.

37. The terms of this CAFO bind Respondent and its successors and assigns.

38. Each person signing this consent agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

39. Each party agrees to bear its own costs and attorney's fees in this action.

40. This CAFO constitutes the entire agreement between the parties.

United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Respondent

1 Apr 16
Date

James R. Gray
Executive
United States Steel Corporation

4/1/2016
Date

Robert F. Casselberry
Senior Counsel
United States Steel Corporation

U.S. Environmental Protection Agency, Complainant

Date	M. Cecilia Moore, Chief Enforcement and Compliance Assurance Branch U.S. Environmental Protection Agency Region 5
Date	Richard C. Karl, Director Superfund Division U.S. Environmental Protection Agency Region 5

In the Matter of: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan
Docket No. _____

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

_____
Date

_____
Robert A. Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5

In the Matter of: United States Steel Corporation d/b/a Double Eagle Steel Coating Company, Dearborn, Michigan
Docket No. _____

Certificate of Service

I certify that I sent a true and correct copy of the foregoing Consent Agreement and Final Order, which was filed on _____ in the following manner to the addressees:

Copy by Certified Mail
Return Receipt Requested:

Robert F. Casselberry
Senior Counsel
United States Steel Corporation
600 Grant Street, Room 1500
Pittsburgh, PA 15219

Copy by E-mail to
Attorney for Complainant: Robert H. Smith
Smith.roberth@epa.gov

Copy by E-mail to
Regional Judicial Officer: Ann Coyle
Coyle.ann@epa.gov

Dated: _____

_____
LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5

CERTIFIED MAIL RECEIPT NUMBER(S): _____

(b) (5) Deliberative Process

[redacted]

(b) (5) Deliberative Process

[redacted]

(b) (5) Deliberative Process

[redacted]

(b) (5) Deliberative Process

[redacted]

(b) (5) Deliberative Process

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[redacted]

(b) (5) Deliberative Process

[redacted]

(b) (5) Deliberative Process

[redacted]

(b) (5) Deliberative Process

[redacted]