MILBANK MANUFACTURING, CO.
KOKOMO FACILITY

ACCIDENTAL SPILL PREVENTION PROGRAM (ASPP)

SPILL AND LEAK PREVENTION EQUIPMENT AND PROCEDURES

EQUIPMENT:

(1) Sump for 5-stage cleaning system is protected by 2" minimum dam. All tanks have valved overflows to sump. Tanks 1 and 3 are double-valved to prevent leaks.

(2) Clay absorbent material is used for spill containment.

(3) Primary raw chemicals for cleaning system are stored in containment cabinets.

PROCEDURES:

In each department with stored hazardous chemicals, management and/or maintenance personnel visually inspect the storage areas for leaks prior to manufacturing operations.

Efforts are made to store chemicals in areas with minimal collision potential while maintaining good visibility.

Equipment with large volumes of chemicals (5-stage cleaning system) are visually inspected daily for leaks or spills. During cleanout operations, the cleaning system is visually inspected for mechanical or structural problems that could contribute to leaks or spills.

General employees who handle small amounts of chemicals in their routine work are encouraged to practice good housekeeping. Employees who transport or store large containers of chemicals are instructed in spill prevention as part of their job training.

EMERGENCY RESPONSE EQUIPMENT AND PROCEDURES

Equipment (Location)

(1) Absorbent material (5-stage system and maintenance)

(2) First aid equipment (First Aid room)

(3) Eye wash stations (5-stage system)

(4) Rubber gloves (5-stage system and maintenance)

(5) Plastic drums for contaminated material storage (nearest trash drum with liner removed) and steel drums for combustible materials.

(6) Splash aprons (5-stage system and maintenance)

Procedures:

Employees are instructed to notify their leadman or foreman immediately when they notice a spill or leak in their work area. The foremen inform maintenance and management personnel.

Maintenance and management personnel determine the severity of the spill or leak and necessary action required.

Substantial spills or leaks are handled as follows:

If necessary, employees are removed from the immediate area. If department or plant-wide evacuation is necessary, employees follow the procedures outlined in the Emergency Action Plan.

Power is removed from any equipment affected by the spill or leak.

Maintenance personnel attempt to control the leak or spill using appropriate protective equipment. Small spills are contained by absorbent material or portable dams. Spills or leaks from the 5-stage system are confined to the immediate work area and efforts made to pump remaining fluids into the holding tank.

Spilled material that is not contaminated is collected for reuse when possible. Small spills of contaminated material are collected into plastic drums and pre-treated if necessary. Combustible materials are collected into steel drums. Pre-treatment of acidic or basic materials consists of neutralization and solids separation or screening. Combustible materials are typically not pre-treated.

Disposal of contaminated materials is in accordance with state and local regulations. Outside contractors are utilized when appropriate.

SPILL REPORTING AND ASPP MODIFICATION PROCEDURES

The Kokomo Wastewater Treatment Plant (WWTP) is contacted by telephone in the event of a major spill to the city sewage system or to the outside plant premises. The Kokomo WWTP contact is currently Mitchell Smith at (765) 457-5509.

The ASPP is reviewed by plant management and maintenance personnel when procedures are found to be inadequate or changes in plant operation warrant modification. Modifications are made with the approval of Corporate management.

TRAINING PROCEDURES

General employees are encouraged to report spills immediately and follow good housekeeping practices. For safety purposes, they are generally not allowed to participate in major spill or leak containment efforts.

For employees that work in chemical storage and transport, spill prevention guidelines are included in their job training when hired.

Employees are informed of the chemical hazards in their immediate work area through the procedures as outlined in the Hazard Communication Program.

CERTIFICATION

I certify that the information provided in this document is to the best of my knowledge true and that the accidental spill prevention measures are implemented as described.

Richard Tyler Plant Mgr — 01-03-02

Name/Title — Date

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HAZARDOUS MATERIAL DATA

Hazardous Material	Location in Plant	Max. Vol. (gal)	Container Vol. (gal)	Container Type
Alkaline cleaner solution	5-stage system	3000	3000	closed vat
Iron phosphatizing solution	5-stage system	3000	3000	closed vat
Non-chromate sealer solution	5-stage system	(?)	(?)	closed vat
Diversy (product name)	5-stage system	(?)	55	steel drum
Diversy (product name)	5-stage system	(?)	55	steel drum

etc.