MILBANK MANUFACTURING , CO.
KOKOMO FACILITY

SOLVENT MANAGEMENT PLAN

SPILL AND LEAK PREVENTION EQUIPMENT AND PROCEDURES:

EQUIPMENT:

(1) Clay absorbent material is used for spill containment.
(2) Primary raw material is used for spill containment.
(3) *Drain "containment mat" for dock drain.

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.

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.

*There are no open floor drains to allow spills to go to the Kokomo Wastewater Treatment Plant.

EMERGENCY RESPONSE EQUIPMENT AND PROCEDURES:

Equipment (location)

1. Absorbent material (press room, die shop , crib and maintenance)
2. First aid equipment (first aid room)
3. Rubber gloves (die shop and maintenance)
4. Plastic drums for contaminated material storage (nearest trash drum with liner removed) and steel drums for combustible materials.
5. Splash aprons (die shop and maintenance)
6. Drain mat (dock)

Procedures:

Employees are instructed to notify their leadman or foreman immediately when they notice a spill or lead in their work area. The foreman 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 "absorbent tubes".

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. 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 SOLVENT MANAGEMENT PLAN 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 Solvent Management plan 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 and changes sent to Kokomo WWTP.

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 lead 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 are through the procedures as outline 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 solvent management plan is implemented as described.

Richard Tyler

NAME & TITLE Plant Manager

January. 03, 2002

BRAND NAME (AND USE)	SOLVENT	LOCATION IN PLANT	MAX VOL. (GAL)	CONTAINER VOL. (TYPE)	DISPOSAL
UNISOL PLUS SOLVENT DEGREASER (CLEAN ELECTRICAL CONTACTS / MOTORS)	METHYLENE & PERCHLOROETHYLENE	MAINTENANCE STORAGE CAB.	2 GAL	1 GALLON (METAL CAN)	* PRODUCT USED IN SMALL AMOUNTS SMALL DRIPS EVAPORATE
CHEM SEARCH ND 165 (WATER SOLUABLE FLOOR DEGREASER)	ETHER	MAINTENANCE STORAGE CAB.	5 GAL	2 1/2 GALLON (PLASTIC CONTAINER)	* EVAPORATE
SAFETY KLEEN (DEGREASER TANK)	TOLUENE	DIE SHOP	60 GAL	SELF CONTAINED CABINET	* CABINET SERVICED AND PRODUCT DISPOSED OF BY SAFTEY KLEEN

* THERE ARE NO OPEN FLOOR DRAINS TO ALLOW SPILLS TO GO TO THE KOKOMO WASTEWATER TREATMENT PLANT.