MILBANK

June 19, 2000

Mr. Rodger Fain
Municipal Sanitation Utility
Wastewater Treatment Plant
1501 West Markland Avenue
Kokomo, IN. 46901

Dear Mr. Fain:

Enclosed is the semi - annual results that are required by our IWP permit. Attached documents included are the Solvent Management Plan, The Accidental Spill Prevention Program (ASPP), The TTO Certification Statement and the 40 CFR 433.10 categorical compliance statement and the Analytical Report.

If you have any questions about the attached documents please feel free to contact me at 452-5694.

Sincerely,

Roger D. Blunk

MILBANK MANUFACTURING CO., INC. • P.O. BOX 754 • KOKOMO, INDIANA • 46903-0754 • (765) 452-5694
KANSAS CITY, MO • KOKOMO, IN • EL DORADO, AR • CONCORDIA, MO • ANAHEIM, CA
KANSAS CITY, MO • KOKOMO, IN • EL DORADO, AR • CONCORDIA, MO • ANAHEIM, CA

6-19-00

City of Kokomo
Wastewater Department
1501 W. Markland Avenue
Kokomo, IN 46901

To Whom It May Concern:

I certify under penalty of law that Milbank Mfg. Co., is in compliance the categorical limits set forth in 40 CFR 433.10 and this report and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, to the best of my knowledge and belief is, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Sincerely,

MILBANK MFG. CO., INC.

Duane Skinner

Duane Skinner
Vice President-Manufacturing

VDS:mew

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 — 6-19-00

Name/Title — Date

MILBANK MANUFACTURING CO.
KOKOMO FACILITY

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.

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

6-19-00

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.

6-19-00

City of Kokomo
Wastewater Department
1501 W. Markland Avenue
Kokomo, IN 46901

To Whom It May Concern:

Based on my inquiry of the persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the City.

Sincerely,

MILBANK MANUFACTURING CO.

Duane Skinner

Duane Skinner
Vice President-Manufacturing

VDS:mew

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

City of Kokomo Wastewater Plant
Rodger Fair
1501 W. Markland Ave
Kokomo, In. 46901

4a. Article Number

7000 0520 0017 8019 4109

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

6-23-00

5. Signature (Addressee)

Judith Sheilburn

6. Signature (Agent)

Judith Sheilburn

8. Addressee's Address (Only if requested and fee is paid)

PS Form **3811**, November 1990 ★U.S. GPO: 1991—287-066 **DOMESTIC RETURN RECEIPT**

MIL0002598

7000 0520 0017 8019 4109

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	$ .99
Certified Fee	1.40
Return Receipt Fee (Endorsement Required)	1.25
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 3.64

KOKOMO IN UPTOWN STA 46901 JUN 22 2000 USPS

Postmark Here

Recipient's Name (Please Print Clearly) (To be completed by mailer)
City of Kokomo Wastewater Rodger Fair
Street, Apt. No.; or PO Box No.
1501 W. Markland Ave
City, State, ZIP+4
Kokomo, In 46901

PS Form 3800, February 2000 **See Reverse for Instructions**

MIL0002599