

Spill Prevention, Control, and Countermeasure Plan

Prepared for:



**JW Aluminum, Inc.
777 Tyler Road
Russellville, Arkansas 72802**

Prepared by:

**Meridian Energy & Environment, LLC
1876 Wallenberg Blvd.
Charleston, SC 29407**

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MERIDIAN
Energy & Environment, LLC

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- B: Substantial Harm Determination

- C: Sample Preventative Maintenance Inspection Form and Annual Checklist
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- F: Calculation of Secondary Containment Capacity
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- H: Emergency Contacts
- I: Discharge Notification Form
- J: Discharge Response Equipment Inventory
- K: Agency Notification Standard Report

INTRODUCTION

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by the JW Aluminum, Inc. (JW) plant in Russellville, Arkansas, to prevent oil discharges from occurring, and to prepare JW to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

This Plan has been prepared to meet the requirements of Title 40, Code of Federal Regulations, Part 112 (40 CFR part 112).

In addition to fulfilling requirements of 40 CFR Part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

JW management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix B of this Plan.

This Plan provides guidance on key actions that JW must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in Appendix C.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log included in Appendix E.
- If either of the following occurs, submit the SPCC Plan to the EPA Region 6 Regional Administrator (RA) and the Arkansas Department of Environmental Quality (ADEQ) along with other information as detailed in Section 5.4 of this Plan:
 - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event;
 - or

-
- The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.
 - Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.
 - Amend the SPCC Plan within six (6) months whenever where is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a Professional Engineer (PE).
 - Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.

Part 1. Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

JW Aluminum, Inc. (JW) is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular review and amendment to the Plan. This SPCC Plan has the full approval of JW management. JW has committed the necessary resources to implement the measures described in this Plan.

The Facility Manager is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this Plan.

Facility Manager: Kole Gray, Plant Manager

Signature: _____

Date: _____

1.2 Professional Engineer Certification (40 CFR 112.3(d))

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the Code of Federal Regulations (40 CFR part 112) and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [40 CFR 112.3(d)]

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR part 112. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan.

Name: Tim Owens, P.E.

Signature:

AR PE Registration Number: 18193

Company: Meridian Energy & Environment, LLC

Title: Principal

Date:

1.3 Location of SPCC Plan (40 CFR 112.3(e))

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the facility in the office building. The front office is attended whenever the facility is operating, 24 hours per day, 7 days per week.

1.4 Plan Review (40 CFR 112.3 and 112.5)

1.4.1 Changes in Facility Configuration

In accordance with 40 CFR 112.5(a), JW periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- Commissioning of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- Change in the name or contact information (phone numbers) of individuals responsible for the implementation of this plan; or
- Change in the name or contact information of spill response or cleanup contractors.

JW must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but no later than six months from the date of the amendment. The Facility Manager is responsible for initiating and coordinating revisions to the SPCC Plan.

1.4.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), JW reviews this SPCC Plan at least once every five years. Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). This Plan is dated April 30, 2018. The next plan review is therefore scheduled to take place on or prior to **April 30, 2023**.

1.4.3 Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in the Plan Review Log (Table 1-1). This log must be completed even if no amendment is made to the Plan after the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by **April 30, 2023**.

Table 1-1: Plan Review Log

By	Date	Activity	PE certification required?	Comments
T. Owens	April 30, 2018	Administrative changes	No	Plan reviewed by PE
Jeannie Adame	April 15, 2019	Administrative changes	No	Changes to inspection procedures
Kelli Tracy	August 28, 2020	Administrative changes	No	Changes to facility staff
Kelli Tracy	Dec 8, 2022	Administrative changes	No	Changes to facility staff
Kelli Tracy	August 1, 2023	Stakeholder interest changes	No	Updated policy on notifying community stakeholders.

* Previous PE certifications of this Plan are summarized below.

1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

There are no procedures, methods or equipment at this facility that are not yet fully operational.

1.6 Cross-Reference with SPCC Provisions (40 CFR 112.7)

This SPCC Plan does not follow the exact order presented in 40 CFR Part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC rule. Table 1-2 presents a cross-reference of Plan sections relative to applicable parts of 40 CFR Part 112.

Table 1-2: SPCC Cross-Reference

Provision	Plan Section	Page
112.3(d)	Professional Engineer Certification	4
112.3(e)	Location of SPCC Plan	5
112.5	Plan Review	5 Table 1-1
112.7	Management Approval	3
112.7	Cross-Reference with SPCC Rule	Table 1-2
112.7(a)(3)	Part 2: General Facility Information Appendix A: Site Plan and Facility Diagram	11 Appendix A
112.7(a)(4)	5.4 Discharge Notification	41 Appendix K
112.7(a)(5)	Part 5: Discharge Response	39
112.7(b)	3.4 Potential Discharge Volumes and Direction of Flow	15
112.7(c)	3.5 Containment and Diversionary Structures	32
112.7(d)	3.6 Practicability of Secondary Containment	32
112.7(e)	3.7 Inspections, Tests, and Records	32 Appendix G
112.7(f)	3.8 Personnel, Training and Discharge Prevention Procedures	34
112.7(g)	3.9 Security	35
112.7(h)	3.10 Tank Truck Loading/Unloading	35
112.7(i)	3.11 Brittle Fracture Evaluation	36
112.7(j)	3.12 Conformance with Applicable State and Local Requirements	37
112.8(b)	4.1 Facility Drainage	38
112.8(c)(1)	4.2.1 Construction	38

Provision	Plan Section	Page
112.8(c)(2)	4.2.2 Secondary Containment	38
112.8(c)(3)	4.2.3 Drainage of Diked Areas	38 Appendix D
112.8(c)(4)	4.2.4 Corrosion Protection	39
112.8(c)(5)	4.2.5 Partially Buried and Bunkered Storage Tanks	39
112.8(c)(6)	4.2.6 Inspection Appendix B - Facility Inspection Checklists	39 Appendix C
112.8(c)(7)	4.2.7 Heating Coils	39
112.8(c)(8)	4.2.8 Overfill Prevention System	39
112.8(c)(9)	4.2.9 Effluent Treatment Facilities	39
112.8(c)(10)	4.2.10 Visible Discharges	39
112.8(c)(11)	4.2.11 Mobile and Portable Containers	39
112.8(d)	4.3 Transfer Operations, Pumping and In-Plant Processes	40
112.20(e)	Certification of Substantial Harm Determination	Appendix B

* Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

Part 2. General Facility Information

Name:	JW Aluminum, Inc.
Address:	777 Tyler Road Russellville, Arkansas 72802 (479) 890-3645
Type:	Rolling and drawing of aluminum sheet, plate and foil
Date of Initial Operations:	1997
Owner/Operator:	JW Aluminum, Inc.
Primary contact:	Kole Gray – Plant Manager Work: 479-718-6802 Mobile (24 hours): 479-453-1916

2.1 Facility Description (40 CFR 112.7(a)(3))

2.1.1 Location and Activities

JW Aluminum’s Russellville facility has been in operation since 1997. Wellspring Capital Management is the current owner of JW Aluminum, Inc. The Russellville facility manufactures specialty flat-rolled aluminum products including “fin stock” used by the heating and cooling industry.

JW Aluminum Russellville is located at 777 Tyler Road, Russellville, 72802 in Pope County, Arkansas. The facility is located in the southeast area of the city of Russellville. The plant consists of an aluminum cold mill, a foil mill, a foil separator, and two annealing ovens. Additionally, there is space for receiving rolls of aluminum; the core room, where aluminum foil is allowed to cool; a packing and shipping area; a bearing maintenance area; general maintenance; and motor rooms, oil handling rooms, and offices. The Site Location and Site Plan are included in Appendix A of this Plan show the location and layout of the facility. The Facility Diagram (Figure A-2) shows the location of oil containers, buildings, loading/unloading and transfer areas, and critical spill control structures.

Prime and scrap aluminum is melted in natural gas/ propane fired furnaces. Molten metal is then transferred to holding furnaces for degassing before being directed to sheet casters where the molten material is formed into coils of aluminum sheet. The coils are then moved to rolling mills where the thickness or gauge of the aluminum sheet is reduced to meet customer specifications. During the rolling process, oil is applied to the sheet for lubrication. The rolling oil (Linpar) is re-circulated through one of three oil pits. After the rolling mills, aluminum sheet coils are sent to annealing furnaces. Following annealing, sheet coils may be sent through one of six slitters for sheet width sizing. After this the product is sent to packaging and shipping.

Dirty oil from the rolling mills is filtered and distilled at the tank farm. Nonrecyclable oil is stored on site and disposed of properly utilizing an outside contractor. In addition to the oil stream, JW Aluminum disposes of wastewater utilizing an outside contractor.

2.1.2 Oil Storage

There are several types of oils/oily material used and/or stored at the facility, including:

- a. Linpar oil applied to coils during rolling mill operations for lubrication;
- b. Diesel fuel used for generators and fire pumps;
- c. Hydraulic oil used in process equipment;
- d. Dielectric mineral oil contained in electrical transformers;
- e. Mineral oil used in slitter operations;
- f. Solvents used in coating operations; and
- g. Oily wastewater.

An inventory of the tanks and tank contents at the facility that are regulated under this SPCC plan are listed in Table 3-1. All containers with capacity of 55 gallons or more are included.

2.2 Evaluation of Discharge Potential

2.2.1 Facility Drainage and Flow Paths

Facility drainage patterns and drainage basin boundaries are shown on the Facility Diagram (Figure A-2 in Appendix A). The topography of the area is gently rolling to flat in the Arkansas River Valley. Drainage from much of the paved surfaces and the roof of the building flows to a large storm sewer that flows north along the eastern side of the plant into an unnamed stream. Drainage from the front (western and southern areas) of the plant is surficial flow that drains into a series of grass-lined ditches and retention

basins before discharging to the same unnamed stream that flows into Whig Creek, which eventually flows into the Arkansas River.

Secondary containment capacities for the bulk storage tanks is provided on Table 3-1. All bulk oil storage tanks and oil filled equipment are identified on Figure A-2.

2.2.2 Discharge History

Table 2-1 summarizes the facility’s discharge history.

Table 2-1: Oil Discharge History

Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence
5/12/2000 - ~30,000 gallons of oil released in and around the pump house which reached a drainage ditch	~2,000 gallons of oil was recovered, an eight-foot sump was dug to bedrock and recovered an additional 200-300 gallons of oil, 33 yards of contaminated rock and soil was removed	A check valve that had been stuck open was repaired, an additional 5 inches was added to the containment structure, a 4-inch diameter pipe was added to divert overflow into an oil spill catch basin located south of the pump house and a level alarm was added to the overflow pipe
7/12/2002 - ~10-20 gallons of MSO released on the floor of the 20 Mill oil room which exited the building and spilled onto the driveway and ground adjacent to the building	Spill booms, pads, and oil dry were used to stop the flow of oil and clean up the residue	Permanent oil cooler was installed, concrete was added in the area to direct flow to containment area and a new containment area was added at 22 Mill.

Part 3. Discharge Prevention - General SPCC Provisions

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

3.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))

Tanks and drums are inspected regularly with a schedule in accordance with the Steel Tank Institute (STI) SP-001 tank inspection standard as described in this Plan. Properly trained personnel monitor tank truck loading/unloading activities at the Tank Farms.

All above ground storage tanks (AST) currently in operation by JW Aluminum are located on concrete pads with concrete dikes or curbing with sloped areas, trench drains and sumps sufficient to store the contents of the largest tank plus enough freeboard for the 25-year, 24-hour precipitation event (7.5" per SRCC Technical Report 97-1, Rainfall Frequency/Magnitude Atlas for South-Central United States, Louisiana State University, Baton Rouge, LA, 1997). Secondary containment calculations are provided in Appendix F. Spill kits are also used to contain material spilled in the yard or inside the buildings.

Any leakage from a primary container would be detected through visual observation during Preventative Maintenance inspections performed on a monthly basis. Any leak would be contained and readily detected by facility personnel before a discharge to navigable waters or adjoining shorelines could occur. Corrosion poses minimal risk of failure since drums are single-use and remain on site for a relatively short period of time (less than one year). The drum storage areas are also visually inspected monthly. This is in accordance with accepted industry practice for drum storage and provides an effective means of verifying container integrity, as noted by EPA in the preamble to the SPCC rule in the *Federal Register* (67 FR 47042).

3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

Figure A-1 in Appendix A shows the general location of the facility on a U.S. Geological Survey topographic map. Figure A-2 in Appendix A presents a layout of the facility and the location of storage tanks and drums. The diagram also shows the location of storm water drain inlets and the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the facility diagram indicates the location and content of ASTs, USTs, and transfer stations and connecting piping.

3.3 Spill Reporting (40 CFR 112.7(a)(4))

The discharge notification form included in Appendix K will be completed upon immediate detection of a discharge and prior to reporting a spill to the proper notification contacts.

3.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Table 3-1 presents expected volume, discharge rate, general direction of flow in the event of equipment failure and means of secondary containment for different parts of the facility where oil is stored, used, or handled.

P – Periodic Owner’s Inspection
 I- Formal Internal Inspection
 E – Formal External Inspection
 L- Leak Test (Tank Integrity)

Table 3.1

Map ID	Location	Contents	Maximum Capacity	Material of Construction	Filling Source	Level Indication	STI SP-001 Category	Inspection Schedule	Potential Spill Scenario	Maximum Spill Rate	Path to Water	Secondary Containment, yes/no	Secondary Containment, gallons
1	Tank Farm	Virgin Rolling Oil (20 Mill)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	61,567 Gallons
11	Tank Farm	Virgin Rolling Oil (22 Mill)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	61,567 Gallons
2	Tank Farm	Virgin Rolling Oil (22 Mill)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	61,567 Gallons
3	Tank Farm	Virgin Rolling Oil (22 Mill)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	61,567 Gallons
10	Tank Farm	Virgin Rolling Oil (20 Mill)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	61,567 Gallons

P – Periodic Owner’s Inspection
 I- Formal Internal Inspection
 E – Formal External Inspection
 L- Leak Test (Tank Integrity)

Table 3.1

Map ID	Location	Contents	Maximum Capacity	Material of Construction	Filling Source	Level Indication	STI SP-001 Category	Inspection Schedule	Potential Spill Scenario	Maximum Spill Rate	Path to Water	Secondary Containment, yes/no	Secondary Containment, gallons
4	Tank Farm	Spent Oils (sold for Fuel Oil)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	61,567 Gallons
9	Tank Farm	Oil/Water	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	61,567 Gallons
5	Tank Farm	20 Mill Extra	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	32,932 Gallons
8	Tank Farm	Distilled Rolling Oil (20 Mill)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	32,932 Gallons
7	Tank Farm	Distilled Rolling Oil (22 Mill)	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	32,932 Gallons

P – Periodic Owner’s Inspection
 I- Formal Internal Inspection
 E – Formal External Inspection
 L- Leak Test (Tank Integrity)

Table 3.1

Map ID	Location	Contents	Maximum Capacity	Material of Construction	Filling Source	Level Indication	STI SP-001 Category	Inspection Schedule	Potential Spill Scenario	Maximum Spill Rate	Path to Water	Secondary Containment, yes/no	Secondary Containment, gallons
6	Tank Farm	22 Mill Extra	20,304 Gallons	Steel	Tanker Truck	External Sight Gauge	2	P, E(5), L(10)	Level malfunction with tank over-filling	100 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	32,932 Gallons
12	Western Portion of the Facility	Diesel Fuel	672 Gallons	Steel	Tanker Truck	External Sight Gauge	3	P, E(10), L(10)	Puncture	672 gallons in 30 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	120,997 Gallons (Rail Loading/ unloading Containment)
13	Western Portion of the Facility	Diesel Generator (Baldor)	910 Gallons	Steel	Tanker Truck	Manual Visual	1	P	Overfilling	50 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Double-walled
Transformers 1-8	East Service Road	Dielectric Mineral Oil	162-398 Gallons	Pad-Mounted Transformers	Manual	Manual Visual	1	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Spill Kit/Sorbent Materials and Truck Ramp/Detention Pond
Transformer 9	East Service Road	Dielectric Mineral Oil	294 Gallons	Pad-Mounted Transformer	Manual	Manual Visual	1	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Spill Kit/Sorbent Materials and Truck Ramp/Detention Pond

P – Periodic Owner’s Inspection
 I- Formal Internal Inspection
 E – Formal External Inspection
 L- Leak Test (Tank Integrity)

Table 3.1

Map ID	Location	Contents	Maximum Capacity	Material of Construction	Filling Source	Level Indication	STI SP-001 Category	Inspection Schedule	Potential Spill Scenario	Maximum Spill Rate	Path to Water	Secondary Containment, yes/ no	Secondary Containment, gallons
Transformer 10	East Service Road	Dielectric Mineral Oil	239 Gallons	Pad-Mounted Transformer	Manual	Manual Visual	1	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Spill Kit/Sorbent Materials and Truck Ramp/Detention Pond
Transformer 11	East Service Road	Dielectric Mineral Oil	307 Gallons	Pad-Mounted Transformer	Manual	Manual Visual	1	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Spill Kit/Sorbent Materials and Truck Ramp/Detention Pond
Comp Rm	Compressor Room	Lube Oil 27	294 Gallons	Steel	Manual, tote	Manual Visual	2	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Plant Floor Area Sufficient
Comp Rm	Compressor Room	Lube Oil 32	294 Gallons	Steel	Manual, tote	Manual Visual	2	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Plant Floor Area Sufficient
Dist. Oil Room	Distilled Oil Rooms	20 Mill Distiller Tank/ Waste Tank	800 Gallons/ 1,800 Gallons	Steel	Transfer pump	Manual Visual	2	P	Piping leak	10 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	20,945 Gallon In-ground Pit

P – Periodic Owner’s Inspection
 I- Formal Internal Inspection
 E – Formal External Inspection
 L- Leak Test (Tank Integrity)

Table 3.1

Map ID	Location	Contents	Maximum Capacity	Material of Construction	Filling Source	Level Indication	STI SP-001 Category	Inspection Schedule	Potential Spill Scenario	Maximum Spill Rate	Path to Water	Secondary Containment, yes/no	Secondary Containment, gallons
Dist. Oil Room	Distilled Oil Rooms	22 Mill Distiller Tank/ Waste Tank	1,800 Gallons/ 1,800 Gallons	Steel	Transfer pump	Manual Visual	2	P	Piping leak	10 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	20,945 Gallon Inground Pit
Cast House Building	Cast House Building	Diesel Fuel	194 Gallons	Steel	Manual, tote	Manual Visual	1	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Double-walled
Rolling Mill Area	Slitter Area	Rolling Oil	2 @250 Gallons	Plastic	Manual, tote	Manual Visual	2	P	Puncture	55 gallons in 60 minutes	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Plant Floor Area Sufficient
	Throughout Process Areas	Various Oils	Varies @ 55 Gallons	Metal Drums	Manual	Manual Visual	2	P	Puncture	10 gpm	Grass-lined ditches to unnamed tributary of Whig Creek	Yes	Plant Floor Area Sufficient

3.5 Containment and Diversionary Structures (40 CFR 112.7(c))

Methods of secondary containment at this facility include a combination of structures (e.g., built-in secondary containment and indoor storage), and land-based spill response (e.g., sorbents) to prevent oil from reaching navigable waters and adjoining shorelines:

- For bulk storage containers (refer to Section 4.2.2 of this Plan):
 - **Secondary Containment.** Some of the tanks detailed in Table 3-1 of this plan are located with secondary containment areas built with impervious materials and designed to contain the volume of the largest tank and precipitation for containers located outdoors. In some cases, the building serves as secondary containment with its concrete floor and floor area sufficient to contain a spill.
 - **Double-wall tank construction.** Two tanks containing diesel fuel have a double-wall design with a secondary shell designed to contain 110 percent of the inner shell capacity.
 - **Drum Storage.** Drums are stored on spill pallets or inside the maintenance shop and spills are expected to remain inside the building based on storage locations. These containers are also not exposed to precipitation.
- In transfer areas and other parts of the facility where a discharge could occur:
 - **Sorbent material.** Spill cleanup kits that include absorbent material are strategically located throughout the facility as shown on Figure A-2. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur. The response equipment inventory for the facility is listed in Appendix J of this Plan. The inventory is checked monthly to ensure that used material is replenished.
 - **Drainage system.** The majority of site drainage ultimately goes to a series of open channels and detention basins where a spill could be contained prior to it leaving the site.

3.6 Practicability of Secondary Containment (40 CFR 112.7(d))

JW Aluminum management has determined that (active) secondary containment is practicable at this facility for the ASTs located outside.

3.7 Inspections, Tests, and Records (40 CFR 112.7(e))

As required by the SPCC rule, JW performs the inspections, tests, and evaluations listed in the following table. Table 3-2 summarizes the various types of inspections and tests

performed at the facility. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the facility (e.g., Section 4.2.6 for bulk storage containers).

Table 3-2: Inspection and Testing Program

Facility Component	Action	Frequency/Circumstances
AST	Visual Inspection	Following a regular schedule and whenever material repairs are made. See Table 3-1.
AST with capacity of 5,000 to 50,000 gallons	Formal External Inspection	Performed by a certified inspector every 5 years
Drums	Visual Inspection	Following a regular schedule and whenever material repairs are made. See Table 3-1.

3.7.1 Preventative Maintenance

JW performs preventative maintenance of all equipment on a regularly scheduled basis.

3.7.2 Preventative Maintenance Inspections

JW personnel perform Preventative Maintenance Inspections on a monthly basis in order to determine if additional maintenance is required. These monthly inspections also cover the following key SPCC elements:

- Observing the exterior of the aboveground storage tanks for signs of deterioration, leaks, corrosion, and thinning.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Checking the inventory of discharge response equipment and restocking as needed.

A sample Preventative Maintenance Inspection Form can be found in Appendix C.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Facility Manager. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written monthly inspection records are signed by the Facility Manager or his designee and maintained with this SPCC Plan for three years.

3.7.3 Annual Inspection

Facility personnel or a contracted representative performs a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the preventative maintenance inspections described above and is performed in July of each year using the checklist provided in Appendix C of this Plan.

Written annual inspection records are signed by the Facility Manager and maintained with this SPCC Plan for three years.

3.7.4 Periodic Integrity Testing

The schedule for periodic integrity testing per Steel Institute Standard SP-001 is provided in Table 3-1.

3.8 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(f))

The Facility Manager is the facility designee and is responsible for oil discharge prevention, control, and response preparedness activities at this facility.

JW management has instructed oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held by the Facility Manager for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the

briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Records of the briefings and discharge prevention training are kept on the form shown in Appendix E and maintained with this SPCC Plan for three years.

3.9 Security (40 CFR 112.7(g))

The facility is fenced and locked after hours.

3.10 Tank Truck Loading/Unloading Rack Requirements (40 CFR 112.7(h))

The potential for discharges during the filling of the AST from a tank truck is the responsibility of the vendor providing the fuel. However, JW is committed to ensuring the safe transfer of material to and from storage tanks. The following measures are implemented to prevent oil discharges during fuel transfer operations.

3.10.1 Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation. JW ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose.

The Facility Manager or his designee supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing, approved suppliers.

Vehicle filling operations are performed by facility personnel trained in proper discharge prevention procedures. The truck driver or facility personnel remain with the vehicle at all times while fuel is being transferred. Transfer operations are performed according to the minimum procedures outlined in Table 3-3.

Table 3-3: Fuel Transfer Procedures

Stage	Tasks
Prior to loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Visually check all hoses for leaks and wet spots. <input type="checkbox"/> Verify that sufficient volume is available in the storage tank or truck. <input type="checkbox"/> Lock in the closed position all drainage valves of the secondary containment structure. <input type="checkbox"/> Secure the tank vehicle with wheel chocks and interlocks. <input type="checkbox"/> Ensure that the vehicle's parking brakes are set. <input type="checkbox"/> Verify proper alignment of valves and proper functioning of the pumping system. <input type="checkbox"/> If filling a tank truck, inspect the lowermost drain and all outlets. <input type="checkbox"/> Establish adequate bonding/grounding prior to connecting to the fuel transfer point. <input type="checkbox"/> Turn off cell phone.
During loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Driver must stay with the vehicle at all times during loading/unloading activities. <input type="checkbox"/> Periodically inspect all systems, hoses and connections. <input type="checkbox"/> When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. <input type="checkbox"/> When making a connection, shut off the vehicle engine. When transferring Class 3 materials, shut off the vehicle engine unless it is used to operate a pump. <input type="checkbox"/> Maintain communication with the pumping and receiving stations. <input type="checkbox"/> Monitor the liquid level in the receiving tank to prevent overflow. <input type="checkbox"/> Monitor flow meters to determine rate of flow. <input type="checkbox"/> When topping off the tank, reduce flow rate to prevent overflow.
After loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Make sure the transfer operation is completed. <input type="checkbox"/> Close all tank and loading valves before disconnecting. <input type="checkbox"/> Securely close all vehicle internal, external, and dome cover valves before disconnecting. <input type="checkbox"/> Secure all hatches. <input type="checkbox"/> Disconnect grounding/bonding wires. <input type="checkbox"/> Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan. <input type="checkbox"/> Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage. <input type="checkbox"/> Remove wheel chocks and interlocks. <input type="checkbox"/> Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

3.11 Brittle Fracture Evaluation (40 CFR 112.7(i))

There are no field-constructed tanks at the facility. All tanks were shop-built.

3.12 Conformance with State and Local Applicable Requirements (40 CFR 112.7(j))

There are no other applicable requirements or any other effective discharge prevention and containment procedures or applicable more stringent local, state or federal laws, rules, regulations or guidelines that are required to be followed at this facility.

Part 4. Discharge Prevention – SPCC Provisions for Onshore Facilities (Excluding Oil Production Facilities)

4.1 Facility Drainage (40 CFR 112.8(b))

Any potential discharge from the ASTs located outside the buildings will either be retained by the secondary containment structure surrounding the tank or be directed to one of the oil/water separators. Discharges occurring during loading/unloading operations will be contained with spill absorbent material. In addition, all other containers of petroleum products are located in containment structures or stored inside of a building where spills will be contained by absorbent material, if necessary.

These measures provide environmental protection equivalent to ponds, lagoons, or catchment basins required under 40 CFR 112.8(b)(3) and (4), as allowed in 40 CFR 112.7(a)(2).

4.2 Bulk Storage Containers (40 CFR 112.8(c))

Table 3-1 includes the construction, volume, and content of bulk storage containers at JW Aluminum.

4.2.1 Construction (40 CFR 112.8 (c)(1))

All bulk storage containers located at JW Aluminum are constructed of steel. The design and construction of all bulk storage containers are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions.

4.2.2 Secondary Containment (40 CFR 112.8(c)(2))

The ASTs at JW are equipped with secondary containment in the form of diked secondary containment structures or other means of containment including indoor floor area and sorbents. All other containers subject to the provisions of this plan are stored inside a building that uses a Spill Kit for secondary containment or outside under cover in secondary containment structures.

4.2.3 Drainage of Secondary Containment Areas (40 CFR 112.8(c)(3))

The secondary containment areas for ASTs located outside and exposed to rain are drained of any accumulated precipitation after it is verified that no hydrocarbons are present, and the dike drainage form located in Appendix D is filled out.

4.2.4 Corrosion Protection (40 CFR 112.8(c)(4))

This section is not applicable since there is no buried outdoor piping at the facility.

4.2.5 Partially Buried and Bunkered Storage Tanks (40 CFR 112.8(c)(5))

This section is not applicable since there are no partially buried or bunkered storage tanks at this facility.

4.2.6 Inspections and Tests (40 CFR 112.8(c)(6))

Visual inspections of the oil containers are performed monthly by facility personnel in accordance with STI SP-001. Leaks from tank seams, discharge valves and other appurtenances will be promptly corrected. Records of monthly inspections are signed by the individual performing the inspection and kept at the facility for at least three years.

4.2.7 Heating Coils (40 CFR 112.8(c)(7))

There are no internal heating coils on oil tanks at this facility.

4.2.8 Overfill Prevention Systems (40 CFR 112.8(c)(8))

Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

Storage drums are not refilled, and therefore overfill prevention systems do not apply.

4.2.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

This section does not apply as the facility does not have any effluent treatment facilities.

4.2.10 Visible Discharges (40 CFR 112.8(c)(10))

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, and bolts – are quickly corrected upon discovery.

Oil, if present on the ground, is promptly cleaned up with appropriate spill kit materials and disposed of according to the waste disposal method described in Part 5 of this Plan.

4.2.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))

Small portable oil storage containers, such as 55-gallon drums, are stored in secondary containment structures or inside the maintenance shops. Any discharged material is quickly contained and cleaned up using sorbent pads and appropriate cleaning products.

4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

Transfer operations at this facility include:

- The filling of ASTs from a tank truck.
- The transfer of diesel from ASTs to various pieces of equipment.

All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

Part 5. Discharge Response

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material;
- Contact the Facility Manager or his alternate;
- Contact regulatory authorities and the response organization; and
- Collect and dispose of recovered products according to regulation.

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either "minor" or "major," depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix H. The list is also posted at prominent locations throughout the facility. A list of discharge response material kept at the facility is included in Appendix J.

5.1 Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (i.e., may involve less than 10 gallons of oil);
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water;

- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by JW personnel. The following guidelines apply:

- Immediately notify the Facility Manager.
- Under the direction of the Facility Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Facility Manager will complete the discharge notification form (Appendix K) and attach a copy to this SPCC Plan.
- If the discharge involves more than 10 gallons of oil, the Facility Manager will call ADEQ's Water Division at (501) 682-0744).

5.2 Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters water;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- All workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas at a safe distance from the discharge.
- If the Facility Manager is not present at the facility, the senior on-site person notifies the Facility Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge.
- The Facility Manager (or senior on-site person) must call for medical assistance if workers are injured.

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- The Facility Manager (or senior on-site person) must notify the Fire Department or Police Department.
 - The Facility Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in Appendix H.
 - The Facility Manager (or senior on-site person) must immediately contact the Arkansas Department of Emergency Management (1-800-322-4012) and the National Response Center (1-800-424-8802).
 - The Facility Manager (or senior on-site person) must record the call on the Discharge Notification form in Appendix K and attach a copy to this SPCC Plan.
 - The Facility Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the Facility Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

5.3 Waste Disposal

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler.

Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor in accordance with applicable legal requirements.

5.4 Discharge Notification

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

A summary sheet is included in Appendix K to facilitate reporting. The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident

-
- Source and cause of the release or discharge
 - Types of material(s) released or discharged
 - Quantity of materials released or discharged
 - Danger or threat posed by the release or discharge
 - Number and types of injuries (if any)
 - Media affected or threatened by the discharge (i.e., water, land, air)
 - Weather conditions at the incident location
 - Any other information that may help emergency personnel respond to the incident

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix H and is also posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance buildings, and at the loading rack/unloading area).

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix H) whenever the facility discharges (as defined in 40 CFR 112.1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42 gallons of oil in each of two discharge incidents within a 12-month period. The following information must be submitted to the EPA Regional Administrator and to ADEQ within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;

-
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
 - Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator and to ADEQ is included in Appendix K of this Plan.

5.4.2 Notifying Community Stakeholders

JW Aluminum will disclose to affected community stakeholders the volume, type and potential impact of significant spills immediately after an incident. JW Aluminum will determine what constitutes a significant spill by considering the volume, type and impact of the spill. JW Aluminum's communications department will provide follow up disclosure of the results of remediation activities, if necessary, and prompt response to inquiries. In addition, JW Aluminum will publicly disclose, in its annual sustainability report, updated information about significant spills, the assessment of their impacts and the mitigation actions undertaken.

5.5 Cleanup Contractors and Equipment Suppliers

Contact information for specialized spill response and cleanup contractors are provided in Appendix H. These contractors have the necessary equipment to respond to a discharge of oil.

Spill kits are located inside the maintenance buildings. The inventory of response supplies and equipment is provided in Appendix J of this Plan. The inventory is verified monthly. Additional supplies and equipment may be ordered from the following sources:

Grainger Industrial Supply (501) 568-7800

Appendix A

Site Plan and Facility Diagram

Appendix B

Substantial Harm Determination

Facility Name: JW Aluminum, Inc.

Facility Address: 777 Tyler Road

Russellville, Arkansas 72802

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

Yes No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

Yes No

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes No

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature

Title

Name

Date

APPENDIX C

Sample Preventative Maintenance Inspection Form and Annual Inspection Checklist

The following Annual Inspection checklist must be signed by the inspector and maintained at the facility, with this SPCC Plan, for at least three years.

Annual Facility Inspection Summary Checklist

This inspection record must be completed *each year*. If any response requires further elaboration, provide comments in the Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks			
ASTs			
<i>Tank surfaces show signs of leakage</i>			
<i>Tank is damaged, rusted or deteriorated</i>			
<i>Bolts, rivets or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Vents are obstructed</i>			
Totes			
<i>Tank surfaces show signs of leakage</i>			
<i>Tank is damaged, rusted, or deteriorated</i>			
<i>Bolts, rivets, or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Vents are obstructed</i>			
Small Storage Containers			
<i>Surfaces show signs of leakage</i>			
<i>Containers are damaged, rusted, or deteriorated</i>			
<i>Bolts, rivets, or seams are damaged</i>			
Response equipment			
<i>Response equipment inventory is incomplete</i>			

Annual reminders:

- Hold SPCC Briefing for all oil-handling personnel (and update briefing log in the Plan);
- Check contact information for key employees and response/cleanup contractors and update them in the Plan as needed

Date: _____

Signature: _____

APPENDIX D

Record of Containment Dike Drainage

This record must be completed when rainwater from diked areas is drained into a storm drain or into an open watercourse, lake, or pond, and bypasses the water treatment system. The bypass valve must normally be sealed in the closed position. It must be opened and resealed following drainage under responsible supervision.

Tank ID: _____

Date	Diked Area	Presence of	Time	Time	Signature

APPENDIX E

Record of Annual Discharge Prevention Briefings and Training

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

APPENDIX F

Calculation of Secondary Containment Capacity

The precipitation level corresponding to the 25-year, 24-hour precipitation event (7.5" per SRCC Technical Report 97-1, Rainfall Frequency/Magnitude Atlas for South-Central United States, Louisiana State University, Baton Rouge, LA, 1997).

Bulk Oil Storage

Secondary containment calculations are provided for the following oil-related bulk storage tanks and diked areas:

- Tank Farm (East Containment)
- Tank Farm (West Containment)
- Truck Loading Ramp
- Diesel Tank
- Diesel Generator
- Railcar Loading/Unloading Secondary Containment

Tank Farm (East Containment)

Tank Farm (East Containment) is an indoor diked area containing four (4) vertical storage tanks. Each of the four vertical storage tanks occupy volume within the secondary containment and this volume is subtracted from the total secondary containment. Each of the tanks has a volume of 20,304 gallons and a diameter of 12 feet. The diked area has dimensions of 33.33 feet long by 30.75 feet wide by 6.42 feet high.

The total containment area is:

$$(33.33 \text{ ft} \times 30.75 \text{ ft}) = 1024.90 \text{ ft}^2$$

The obstructed area is:

$$3 \text{ tanks} * (0.25 * 3.14 * (12 \text{ ft})^2) = 339.12 \text{ ft}^2$$

The available containment area is:

$$1024.90 \text{ ft}^2 - 339.12 \text{ ft}^2 = 685.78 \text{ ft}^2$$

The available containment volume is:

$$685.78 \text{ ft}^2 \times 6.42 \text{ ft} = 4,402.71 \text{ ft}^3 = 4,402.71 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 32,932.30 \text{ gal}$$

The required tank content containment volume is:

20,304 gal

And, since the tank farm is located indoors, no rainfall adjustment volume is required.

Therefore, secondary containment is adequate.

Tank Farm (West Containment)

Tank Farm (West Containment) is an indoor diked area containing seven (7) vertical storage tanks. Each of the seven vertical storage tanks occupy volume within the secondary containment and this volume is subtracted from the total secondary containment. Each of the tanks have a volume of 20,304 gallons and a diameter of 12 feet. The diked area has dimensions of 63.75 feet long by 30.75 feet wide by 6.42 feet high.

The total containment area is:

$$(63.75 \text{ ft} \times 30.75 \text{ ft}) = 1960.31 \text{ ft}^2$$

The obstructed area is:

$$6 \text{ tanks} * (0.25 * 3.14 * (12 \text{ ft})^2) = 678.24 \text{ ft}^2$$

The available containment area is:

$$1,960.31 \text{ ft}^2 - 678.24 \text{ ft}^2 = 1,282.07 \text{ ft}^2$$

The available containment volume is:

$$1282.07 \text{ ft}^2 \times 6.42 \text{ ft} = 8,230.89 \text{ ft}^3 = 8,230.89 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 61,567.10 \text{ gal}$$

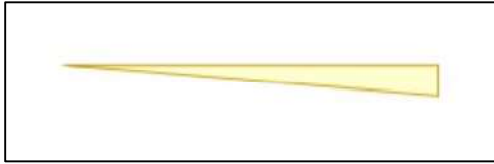
The required tank content containment volume is:

20,304 gal

And, since the tank farm is located indoors, no rainfall adjustment volume is required.

Therefore, secondary containment is adequate.

Truck Loading Ramp



The total containment volume is:

$$\text{Area} = \frac{1}{2} \text{ Base} \times \text{Height} = 0.5 \times 47 \text{ ft} \times 4 \text{ ft} = 94 \text{ ft}^2$$

$$(94 \text{ ft}^2 \times 44 \text{ ft}) = 4,136 \text{ ft}^3$$

The obstructed area is:

$$0 \text{ ft}^2$$

The available containment volume is:

$$94 \text{ ft}^2 \times 44 \text{ ft} = 4,136 \text{ ft}^3 = 4,136 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 30,937.30 \text{ gal}$$

The required tank content containment volume is:

$$5,700 \text{ gal (transport truck volume)}$$

And, the required rainfall adjustment volume is:

$$44 \text{ ft} \times 47 \text{ ft} = 2,068 \text{ ft}^2 \times (7.5 \text{ in} \div 12 \text{ in/ft}) = 1,292.50 \text{ ft}^3$$

$$1,292.50 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 9,667.90 \text{ gal}$$

And thus, the total required containment volume is:

$$5,700 \text{ gal} + 9,667.90 \text{ gal} = 15,367.9 \text{ gal}$$

Therefore, secondary containment is adequate.

Railcar Loading/Unloading Secondary Containment

The total containment area is:

$$(45.92 \text{ ft} \times 77.42 \text{ ft}) = 3,555.13 \text{ ft}^2$$

The obstructed area is:

$$0 \text{ ft}^2$$

The available containment area is:

$$3,555.13 \text{ ft}^2$$

The available containment volume is:

$$3,555.13 \text{ ft}^2 \times 4.58 \text{ ft} = 16,176.10 \text{ ft}^3 = 16,176.10 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 120,997.23 \text{ gal}$$

The required tank content containment volume is:

$$30,000 \text{ gal}$$

And, the required rainfall adjustment volume is:

$$3,555.13 \text{ ft}^2 \times (7.5 \text{ in} \div 12 \text{ in/ft}) = 2,221.96 \text{ ft}^3$$

$$2,221.96 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 16,620.26 \text{ gal}$$

And thus, the total required containment volume is:

$$30,000 \text{ gal} + 16,620.26 \text{ gal} = 46,620.26 \text{ gal}$$

Therefore, secondary containment is adequate.

Diesel Tank

Adjacent to the Railcar Loading/Unloading Area is a 672-gallon diesel storage tank. This tank is of double-wall construction with the outer shell providing an additional 110% capacity of the inner shell. Additional secondary containment is provided by the railcar Loading/Unloading Secondary Containment area.

Emergency Diesel Generator

Adjacent to the Truck Loading/Unloading Area is a 910-gallon diesel storage tank. This tank is of double-wall construction with the outer shell providing an additional 110% capacity of the inner shell. Additional secondary containment is provided by the Truck Loading Ramp area.

Sorbent Materials Required for Areas/Tanks without Dikes as Secondary Containment

The following smaller tanks and totes have secondary containment provided by Spill Kits:

- Cast House Building
- Rolling Mill Area
- Dist. Oil Room
- Compressor Room
- Throughput Process Areas
- #1-8 Transformers
- #9 Transformer
- #10 Transformer
- #11 Transformer

APPENDIX G

Records of Tank Integrity and Pressure Tests

Attach copies of official records of tank integrity and pressure tests.

APPENDIX H

Emergency Contacts

Designated person responsible for spill prevention:

Wes Miller– Maintenance Engineering Manager, cell (501) 269-3264

EMERGENCY TELEPHONE NUMBERS:

Facility

Kole Gray, Plant Manager 479-453-1916

Local Emergency Response

Local Emergency Response 911

Russellville Fire Department 479-968-2332

Response/Cleanup Contractors

Waste Services, Inc. 501-888-4323

Pollution Management, Inc. 501-221-7122

Notification

Arkansas Department of Emergency Management 800-322-4012

Arkansas Department of Environmental Quality 501-682-0642

National Response Center 800-424-8802

United States Environmental Protection Agency, Region 6 800-887-6063

APPENDIX I

Discharge Notification Form

Part A: Discharge Information

General information when reporting a spill to outside authorities:

Name: JW Aluminum, Inc.
Address: 777 Tyler Road
Russellville, Arkansas 72802
Telephone: (479) 890-3645
Owner/Operator: Kole Gray – Plant Manager
Primary Contact: Kole Gray – Plant Manager
Work: 479-718-6802
Cell (24 Hr.): 479-453-1916

Type of oil:	Discharge Date and Time:
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Quantity released:	Discovery Date and Time:
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Quantity released to a waterbody:	Discharge Duration:
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Location/Source:

Actions taken to stop, remove, and mitigate impacts of the discharge:

Affected media:

- | | |
|--------------------------------|--|
| <input type="checkbox"/> air | <input type="checkbox"/> storm water sewer/POTW |
| <input type="checkbox"/> water | <input type="checkbox"/> dike/berm/oil-water separator |
| <input type="checkbox"/> soil | <input type="checkbox"/> other: _____ |

Notification person:	Telephone contact:
	Business:
	24-hr:

Nature of discharges, environmental/health effects, and damages:

Injuries, fatalities or evacuation required?

Part B: Notification Checklist

	Date and time	Name of person receiving call
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Discharge in any amount:

		Kole Gray, Plant Manager 479-453-1916
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Discharge in amount exceeding 10 gallons and *not affecting a waterbody or groundwater*

Local Fire Department Fire Chief 911		
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Arkansas Department of Emergency Management (800) 322-4012		
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Discharge in any amount and affecting (or threatening to affect) a waterbody

Local Fire Department Fire Chief 911		
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Arkansas Dept. of Emergency Management (800) 322-4012		
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National Response Center (800) 424-8802		
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Clean-up Contractor Waste Services, Inc. (501) 888-4323 Or Pollution Management, Inc. (501) 221-7122		
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APPENDIX K

Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 6 Administrator, and to ADEQ, within 60 days of the qualifying discharge incident.

Facility:	<i>JW Aluminum, Inc.</i>
Owner/operator:	<i>JW Aluminum, Inc.</i>
Name of person filing report:	<i>Kole Gray, Plant Manager</i>
Location:	<i>777 Tyler Road, Russellville, Arkansas 72802</i>
Maximum storage capacity:	<i>Approximately 240,694 gallons</i>
Daily throughput:	<i>Varies</i>
Nature of qualifying incident(s):	
<input type="checkbox"/> Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons	
<input type="checkbox"/> Second discharge exceeding 42 gallons within a 12-month period.	
Description of facility (attach maps, flow diagrams, and topographical maps):	
<i>JW Aluminum manufactures specialty flat-rolled aluminum products including "fin stock" used by the heating and cooling industry.</i>	
<i>Prime and scrap aluminum is re-melted in a natural gas/ propane fired furnaces. Molten metal is then transferred to holding furnaces for degassing. At the final stage, alloy agents are added for optimal metal conditioning. Additional alloys are added in one of 4 casters and sent to one of the cold rolling mill and then the foil mill for finishing. The facility has a throughput of 56,370 gallons of rolling oil. The rolling oils (Linpar) are recycled and recovered through one of two vacuum distillation units. From the mills, aluminum sheets are sent through one of 4 annealing lines. From annealing, sheets may be sent through the slitter. At that point, the product is sent to packaging and shipping. JW Aluminum has two maintenance shops: the roll shop for caster maintenance and the fork truck shop.</i>	

Agency Notification Standard Report (cont'd)
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:
Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:

Additional preventive measures taken or contemplated to minimize possibility of recurrence:

Other pertinent information: