

**Contractor  
Environmental Management Plan  
AM/NS Calvert Facility**

**AM/NS  
CALVERT**

**Issue Date: March 11, 2020**

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**LIST OF ACRONYMS AND ABBREVIATIONS**

<b>Acronym</b>	<b>Definition</b>
ACNPCP	Alabama Coastal Nonpoint Pollution Control Program
ADEM	Alabama Department of Environmental Management
BMP	Best Management Practices
CBMPP	Construction Best Management Practices Plan
EMP	Environmental Management Plan
ES&H	Environmental Safety and Health
GC	General Contractor
SDS	Safety Data Sheet
NFPA	National Fire Protection Association
NPDES	National Pollutant Discharge Elimination System
NTU	Nephelometric turbidity unit
OCIP	Owner controlled insurance program
OSHA	Occupational Safety and Health Administration
QCI	Qualified Credentialed Inspector
QCP	Qualified Credentialed Professional
Owner	AM/NS Calvert
PAH	Polycyclic aromatic hydrocarbon
PCB	Polychlorinated biphenyl
SHPO	State Historic Preservation Office
SPCC	Spill Prevention, Control and Countermeasures
SVOC	Semi-volatile organic compound
SWPPP	Stormwater Pollution Prevention Plan
TPH	Total petroleum hydrocarbons
AM/NS	AM/NS Calvert, LLC
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VOC	Volatile organic compound

## 1.0 INTRODUCTION

The Contractor Environmental Management Plan (EMP) establishes the commitment of AM/NS Calvert, LLC (AM/NS) to the prevention of pollution and environmental degradation and compliance with local, State, and federal environmental regulations applicable to the Project. This commitment represents a core value of the Project.

AM/NS maintains an ISO 14001 certification and requires its contractors to also be committed to its Environmental Policy as listed below:

### Environmental Commitment

**Sustainable**

*business model built on conservation of natural resources*

**Transparent**

*open and honest with business and community partners*

**Enhancement**

*encouraging continual improvement for pollution prevention*

**Employees'**

*environmental stewardship built on a team commitment at all levels*

**Legal**

*focus on compliance with regulations for environmental protection*

It is not the intent of this EMP to address every environmental regulation or contingency associated with environmental compliance. Each Contractor bears the responsibility of understanding the environmental regulatory requirements associated with their work activities and ensuring that all regulatory requirements are appropriately addressed.

This document is subdivided into two major categories based upon contract type:

- **Part 1:** Basic Environmental Requirements for Contractors performing activities supporting operations and including shutdown activities.
- **Part 2:** Additional Environmental Requirements for Contractors performing activities supporting capital expansion projects and including 'greenfield' projects. Part 1 requirements must also be met in addition to Part 2 requirements.

All Contractors shall submit an Environmental Management Plan for their associated work activities to the Owner for review and approval before beginning their site work activities. AM/NS requires Contractors to adopt Environmental practices and policies that meet or exceed those that are established in this Plan. In some cases, upon request by the Contractor and if approved by the owner's Environmental Department in writing, contractors may adopt this Environmental Management Plan in lieu of preparing a contractor specific environmental management plan. Otherwise, all other Contractors and Contractors performing activities that provide a significant risk due to environmental related activities or could pose a significant impact to the environment will be required to prepare a project or task specific environmental management plan in accordance with contract requirements Annex N – Site Environmental Requirements.

## **1.1 PURPOSE**

The purpose of the EMP is to establish a written program to:

- Ensure all environmental permits and approvals required for the execution of work at the AM/NS Calvert site are obtained, adhered to, and updated as necessary
- Ensure compliance with federal, State, and local laws, regulations and requirements, and industry Best Management Practices (BMPs), and Owner expectations for protection of the environment
- Provide guidance and procedures to all parties working at the site to ensure that environmentally sensitive elements are protected, and full environmental compliance is attained during construction of the Project

Environmentally sensitive elements exist at the site and must be protected. AM/NS Calvert is committed to ensuring that environmental stewardship is a significant component to all scopes of work being performed. The ultimate success of implementing this commitment depends on the full cooperation and commitment of each employer and their employees. Contractors and subcontractors along with their management or supervisors are fully responsible for and accountable to see that the applicable procedures, federal, State and local regulations, and best practices are established and enforced, in addition to ensuring that effective training programs are employed.

The standards established in this Plan are the minimum acceptable level. Contractors are required to analyze their activities and use best management practices and procedures that are

appropriate for their specific activity. Environmental protection must never be sacrificed because of an emphasis on operations or schedule.

Some Contractors will be required to obtain specific environmental permits and approvals, depending on the exact activities they are contracted to perform at the Project site. The following sections and appendices provide guidance and procedures to help the Owner and Contractors identify the necessary environmental-related permits and approvals necessary for the construction phase activity and establishes a mechanism for the Owner to monitor and check that Contractors obtain, maintain, and comply with all requirements during the execution of the contractor's scope of work.

## **2.0 RESPONSIBILITIES**

### **2.1 PURPOSE**

The purpose of this section is to outline, generally, the various participants in the Project and their duties and responsibilities. The specific duties and responsibilities of each party are defined by the respective applicable contracts.

### **2.2 PARTICIPANTS**

**Owner.** The Owner is AM/NS. The Owner will be responsible for the overall management of the Project.

**Contractors.** The Contractors will be employed by the Owner and will report to the Owner or Owner's designated representative. Their duties will be defined by the relevant contract documents. The Contractors may retain Subcontractors as needed. It is the Contractor's responsibility to flow-down the contractual requirements of Annex N and this EMP to its subcontractors.

**Design Professionals.** The Design Professionals will be employed by the Owner and will report to the Owner.

### **2.3 ENVIRONMENTAL RESPONSIBILITIES**

#### **2.3.1 Owner**

Environmental permits will be in the Owner's (or designee's) name unless specifically addressed in the contract requirements. The Owner is responsible for compliance with general and specific conditions of environmental permits. The Owner is also responsible for compliance with local, State, and federal environmental regulations, laws, and ordinances associated with the scope of work. The Owner will monitor, and check permits and approvals to ensure they are updated as necessary to ensure site compliance.



### **2.3.2 Contractors**

The Contractor, in relation to his activities or work at the construction site, is responsible for:

- Complying with federal, State, and local regulations including the acquisition of permits or registrations required for the performance of the Contractor's Work
- Complying with best management practices (BMPs)
- Complying with all applicable permits obtained by the Owner or third parties and any BMPs defined by these permits or by the Owner
- Obtaining all applicable permits, licenses and approvals not otherwise obtained by the Owner or third parties
- Identifying and protecting designated areas or resources
- Obtaining approval to begin work in designated areas
- Preparing and obtaining approval for the Contractor's specific EMP
- Scheduling work to ensure that the preceding requirements have been met

All Contractors shall remain in full compliance with, and will adhere to, all environmental requirements applicable to the AM/NS Calvert facility.

### **Contractor Required Plans and Documents**

For activities associated with their specific work, each Contractor must prepare and submit to the Owner the following:

- EMP
- SPCC Plan (if fuel storage onsite > 50 gallons)
- Erosion and Sedimentation Control BMPs (if any land disturbance activities)
- Dust Prevention and Control Plan (if any land disturbance activities)
- Waste Management Plan
- Chemical Usage Reporting (as required)
- Drafts of plans and documents required by regulations before submittal to regulatory authorities

### 3.0 ENVIRONMENTAL PERMITS AND SPECIFICATIONS

All permits and environmental documentation required to perform the Work will be prepared and/or obtained from the appropriate State or federal agency before work begins.

The following is a comprehensive list of existing (or current) permits and documents related to environmental compliance, and each Contractor will comply with all covenants and restrictions contained therein:

- Comprehensive Wetlands Mitigation Plan
- U.S. Army Corps of Engineers (USACE) Section 404/10 Individual Permit
- NPDES Permit
- SPCC Plan
- Stormwater Best Management Practices Plan
- Title V Air Permit
- ISO-14001:2015

**Table 3-1 Environmental Permits Applicable to Contractors**

Medium	Permit	Agency
Air	Title V	ADEM
Wastewater	Wastewater Discharge – NPDES/SID	ADEM
Storm Water	NPDES Storm Water / BMP	ADEM
	NPDES Individual Storm Water Operating Permit	ADEM

**Notes:**

**ADCNR = Alabama Department of Cultural and Natural Resources**

**ADEM = Alabama Department of Environmental Management**

**BMP = Best Management Practices**

**CBMPP = Construction Best Management Practices Plan**

#### **4.0 PART 1 - SPILL MANAGEMENT AND RESPONSE**

Contractors are responsible for the appropriate management, use, and disposal of hazardous materials required to perform their duties. The identity and contact information for the contractors designated for emergency response shall be provided to the Owner-Environmental. Emergency response contractors and the AM/NS Calvert Fire Department will be on call for emergency response during a release of hazardous materials.

The Contractor may handle, store, and use petroleum products in the form of diesel fuel, oil, and grease for fueling and maintaining equipment at the construction site in their respective work areas. Other hazardous materials may be required (paint, solvents, gases, etc.) by Contractors during the execution of their work in their respective work areas.

##### **4.1 SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN**

Each Contractor intending to provide onsite fuel storage in quantities of 55 gallons or greater is required to submit an SPCC Plan in accordance with U.S. Environmental Protection Agency (USEPA) Regulations (40 CFR Part 112). The plan will be designed to provide the necessary methods, equipment, training, and facilities to prevent contamination of soil or water from refueling and maintenance operations during site construction. An example SPCC format and minimum sections to be addressed is included in Appendix B.

A table with appropriate information related to each storage container shall be included in the SPCC Plan. The information should include storage capacity (gallons), content, and secondary containment type, containment volume provided, and leak test results and/or certifications. All containers with a capacity of 55 gallons or more shall be included in the table.

No underground storage tanks are allowed on site. All storage containers must be situated aboveground and must meet applicable ADEM regulations and American Petroleum Institute and National Fire Protection Association (NFPA) standards. All storage containers shall either be double-walled or permanently mounted within a secondary containment basin. Secondary containment structures such as berms and dikes (if required) shall be lined with appropriate chemical and UV-resistant material and shall be designed to contain liquids released from primary storage or transfer components. All storage tanks shall have placards indicating the

product, Contractor's company name, emergency contact number, capacity, and appropriate NFPA information. Letters for Company name and emergency phone number shall be of a minimum size to be able to be read from a distance of 25 feet. Storage tanks not meeting these requirements or included in the SPCC Plan will not be allowed onsite.

Refueling vehicles and trailers that transport fuel from refueling stations off-site shall meet all Department of Transportation requirements. These vehicles must not be parked on site overnight with fuel stored in the storage compartments unless they are parked within a secondary containment area that has been included in the Contractor's SPCC plan and approved by the Owner-Environmental. Major vehicle maintenance other than refueling and lubrication will be conducted off-site or in approved locations.

If a spill occurs, the Contractor will have spill containment kits nearby for immediate use. Each Contractor shall identify a Spill Response Coordinator in the SPCC Plan. The Spill Response Coordinator shall be a person with experience in environmental spills and response and will be responsible for communicating with the Owner-Environmental. A list and location of each spill kit shall be included in the SPCC Plan.

In the event of a release, the source of the release shall be safely eliminated, including nearby ignition sources. A reportable petroleum release is defined as any amount that violates an applicable water quality standard, causes a film or sheen on or discoloration of the surface of the waters, or causes a sludge or emulsion to be deposited beneath the surface of water. All releases (regardless of amount) must be reported to the Owner. An incident report shall be completed and submitted to the Owner. Any fuel or oil spill greater than 25 gallons or any amount released to surface water must be reported immediately to the Owner, who will notify the appropriate regulatory officials. The Contractor shall perform confirmatory sampling and additional investigation (if deemed necessary) in accordance with the *Alabama Environmental Investigation and Remediation Guidance* (ADEM, latest edition).

In accordance with applicable regulations, the Contractor will be responsible for properly removing and disposing of any contaminated materials released by the Contractor's tank or equipment and will be responsible for mitigation of any impacts resulting from the spill at the Contractor's cost.

All personnel involved in handling of hazardous material, such as refueling or refilling of motor oil and lubricants, will be trained on the procedures described in the SPCC Plan and the use of spill kits. The Contractor will provide the Owner-Environmental written evidence of training, signed by all trained personnel and by the instructor.

Table 4-1 lists other substance categories and their respective reportable quantities in the event of a release.

**Table 4-1 Reportable Quantities**

<b>Chemical/Material</b>	<b>Governing Regulations</b>	<b>Minimum Amount</b>
Petroleum Substances ‡	40 CFR 112	Any amount which violates an applicable water quality standard or causes a film or sheen on or discoloration of the surface of the waters or causes a sludge or emulsion to be deposited beneath the surface of the waters. OR
		25 gallons to soil
Antifreeze (ethylene glycol)	40 CFR 355/302	5,000 lbs (approximately 550 gallons)
Battery Acid (35% sulfuric acid)	40 CFR 355/302	1,000 lbs (approximately 100 gallons) 100 lbs (Sulfuric Acid) 10 lbs (Lead)
Water Treatment Chemicals	40 CFR 355/302	Refer to individual MSDS for constituent and corresponding concentrations then cross reference to 40 CFR 355 and 40 CFR 302.4
Pesticides	40 CFR 355/302	Refer to individual MSDS for constituent and corresponding concentrations then cross reference to 40 CFR 355 and 40 CFR 302.4

‡ Petroleum reportable release quantities do not include releases from regulated underground storage tanks (USTs) subject to regulation under 40 CFR Part 280 or ADEM equivalent. Underground storage tanks are not allowed onsite during construction.

Contact AM/NS Environmental Department if you have any questions about a reportable quantity for materials not listed above.

#### **4.2 CHEMICAL REPORTING REQUIREMENTS (THRESHOLD PLANNING QUANTITIES AND RELEASES)**

In addition to the common potential chemical release requirements presented in Table 4-1 there are additional chemical release reporting requirements depending on the reportable quantity. Additional federal release reporting requirements are presented in Table 4-2.

**Table 4-2 Federal Chemical Storage and Release Reporting Requirements**

<b>Regulatory Statutes (Federal)</b>	<b>Federal Program</b>	<b>Regulatory Reference</b>	<b>Reportable Quantity</b>	<b>Program Reporting Requirement</b>
Clean Air Act (CAA)	Accidental Release Prevention Program (RMP)	40 CFR Part 68	40 CFR 68.130	Report release of certain compounds with RQ ranging from 500 to 10,000 pounds to Local Emergency Planning Committee; and fire department with jurisdiction over facility.
Clean Water Act (CWA)	Oil Prevention Act (OPA)	40 CFR 110 and 112	40 CFR 110.3	Report release of oil that violates applicable water quality standards; causes a film or sheen or discoloration, or causes a sludge or emulsion to be deposited to National Response Center (NRC) (800-424-8802).
Clean Water Act (CWA)	Spill Prevention Control and Countermeasure (SPCC)	40 CFR 112	40 CFR 112.4	Report if single release of oil is greater than 1,000 gallons or more than two releases of oil 42 gallons or more in 12-month period to Regional Federal Administrator.
Clean Water Act (CWA)	Hazardous Substances	40 CFR 116	40 CFR 117.3	Report release of certain compounds with RQ ranging from 1 to 5,000 pounds to Regional Federal Administrator.
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	Superfund Amendments and Reauthorization Act (SARA)	40 CFR 300, 302, 303, 304, 307,310, 311, 373, and 374	40 CFR 302.4	Report release of certain compounds with RQ ranging from 1 to 5,000 pounds to State Emergency Response Commission; Local Emergency Planning Committee; and fire department with jurisdiction over facility.
Emergency Planning and Community Right-to-Know Act (EPCRA)	SARA Title III – Emergency Planning and Notification - Extremely Hazardous Substances	40 CFR 355, 370, and 372	40 CFR 355 (TPQ - Reporting 60 days from reaching TPQ). RQ – Part 355 Appendix A and B	Within 60 days after reaching threshold quantities, provide notification to the State Emergency Response Commission that it is a facility subject to the emergency planning requirements.

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<b>Regulatory Statutes (Federal)</b>	<b>Federal Program</b>	<b>Regulatory Reference</b>	<b>Reportable Quantity</b>	<b>Program Reporting Requirement</b>
Emergency Planning and Community Right-to-Know Act (EPCRA)	Section 311 – MSDS Reporting	40 CFR 370.21	40 CFR 370.20	Extremely hazardous substances is 500 pounds and all other hazardous chemicals is 10,000 pounds. Submit MSDS to: State Emergency Response Commission; Local Emergency Planning Committee; and fire department with jurisdiction over facility.
Emergency Planning and Community Right-to-Know Act (EPCRA)	Section 312 – Tier I and Tier II (Inventory Reporting)	40 CFR 370.25	40 CFR 370.20(b)	Extremely hazardous substances is 500 pounds and all other hazardous chemicals is 10,000 pounds. Report to: State Emergency Response Commission; Local Emergency Planning Committee; and fire department with jurisdiction over facility.
Department of Transportation (DOT)	Hazardous Materials Regulations (HMR)	49 CFR 100-180	49 CFR 172.101 Appendix A Table 1	49 CFR 171.1(b) Pre-Transportation Requirements
US Coast Guard	USCG Regulations	33 CFR Part 126.29, 153, 154, and 203	33 CFR Part 126.29, 153, 154, and 203	Report release to the Captain of the Port or District Commander
Department of Homeland Security (DHS)	Chemical Facility Anti-Terrorism Standards (CFATS)	6 CFR 27	6 CFR 27 Appendix A	Within 60 days of reaching chemical thresholds, conduct inventory, register and complete “Top Screen”



### **4.3 RESPONSIBILITIES IN CASE OF VIOLATION**

In case of violation of any of the requirements by Contractor, or their designated subcontractors, as described above, the following procedures will be implemented by the Contractor.

If a violation of the stated procedures or federal, State, or local regulations occurs related to an environmental compliance requirement described in this manual, the Owner's Environmental Department will be contacted immediately by the appropriate field personnel responsible for monitoring compliance with this EMP. Proposed remedial action to be taken and timely follow-up results of the remedial action will be provided in writing to the Owner by the Contractor. **Work activities may be suspended as a result of violations at the discretion of the Owner or regulatory officials.**

### **4.4 WASTE SEGREGATION AND DISPOSAL**

All waste generated as a result of the construction, demolition or shutdown activities shall be managed, segregated, and disposed of in accordance with all applicable local, state, and federal regulations by the Contractor at no additional cost to the Owner unless explicitly accepted in the contract. Each Contractor (as required by Owner) shall prepare a Waste Management Plan, to be incorporated into their respective EMP, that addresses how wastes (both solid and liquid) shall be segregated, stored, and lists the approved landfills for each type of waste. A high standard of housekeeping shall be maintained on site and any affected areas on roads and rights-of-way.

Waste streams include items such as, but not limited to:

- Universal Wastes such as batteries, fluorescent light bulbs
- Plant trash such as cardboard, metal banding, wrapping cloth, wood and other packaging wastes. Wastes from food also is included in this waste stream.
- Hazardous wastes such as acids, pickle liquor, chromate wastes, paints and solvents, and aerosol cans
- Refuse also known as plant trash
- Recyclables such as aluminum cans, plastic bottles, scrap metal, and paper

- Oily debris (oily water, used oil and oily rags)

All contractors must be familiar and abide by the requirements of this document and properly dispose of wastes according to the above waste types.

At a minimum, the following BMPs shall be met:

- The Contractor shall maintain work areas, including access roads, free of trash, rubbish, and debris.
- The Contractor shall be responsible for daily cleanup and proper labeling, storage, and disposal of all refuse and debris on the site produced by his operations and employees.
- The Contractor is responsible to supply all containers required for collection, storage, and removal of trash, rubbish, and debris resulting from the Work.
- The Contractor shall remove trash, rubbish, petroleum/oil waste (if any) and debris from the site at least once each week and dispose off-site at a permitted facility.
- Burying of trash, debris, cleared trees or shrubs or any waste materials is strictly prohibited.
- All solid waste must be managed in accordance with Division 13 of Chapter 335 of ADEM's Administrative Code. ADEM Administrative Code Rule 335-13-4-.21(1)(c) requires a landfill operator to receive from each generator of industrial and medical waste a written certification that the material does not contain free liquids, regulated hazardous wastes, regulated medical wastes, or regulated PCB wastes. A copy of this certification must be submitted to ADEM, along with the appropriate fee to obtain disposal approval. If the landfill does not have any special procedures of their own, a copy of ADEM Form 300, Solid Waste Profile Sheet should be used. Waste disposal approvals are normally granted for two years. Notify the Owner in writing of the type, amount, and location of disposal of any solid waste.
- Waste shall be disposed at only landfills that have been pre- approved by the Owner.

**Universal Wastes**

There is at least one universal waste storage location for each mill. Fluorescent lamps (light bulbs) containing mercury, waste pesticides, mercury containing equipment such as some thermostats and instrumentation, must be stored in these locations, placed in appropriate containers, not loosely stored, and proper universal waste label with start accumulation dates. Universal wastes must be removed from site within 360 days of accumulation.

**Plant Trash**

Plant trash must be placed in Front End Load (FEL) containers and roll-off containers that are specifically labeled for plant trash. Other wastes such as aerosol cans, recyclable materials, hazardous wastes, universal wastes (such as fluorescent lamps) are strictly prohibited in these waste containers. Industrial Wastes such as sludges, swarf, and other production byproducts should not be disposed of with plant trash and must be segregated. Contact the AM/NS Environmental department if there are any questions.

**Hazardous Wastes**

All hazardous and universal waste must be managed in accordance with Division 14 of Chapter 335 of ADEM's Administrative Code. ADEM Administrative Code Rule 335-14-3.08 requires pre-notification for waste disposed at commercial hazardous waste disposal facilities. Contractor shall notify Owner in writing two weeks before the anticipated generation of a particular hazardous waste.

Contractor shall manage and dispose of any hazardous waste in accordance with applicable regulations and using the Owner's hazardous waste ID number (ALR000042689). The Owner's environmental department must be notified in writing as to the type, amount, and location of any hazardous waste generated onsite and scheduled to be disposed of. The site is currently registered as a "Large Quantity Generator." A list of hazardous waste codes for which the facility has notified may be obtained from the Owner.

A hazardous waste determination must be made for all wastes destined for disposal in accordance with ADEM Admin Code R.335-14-3.01(2). Waste determinations must be coordinated with the Owner's Environmental Department. A waste disposal approval from ADEM for all industrial and hazardous waste must be obtained for waste destined for disposal in the State of Alabama.

Hazardous waste storage areas also known as 90-day storage requirements include:

- Containers must be marked with the words "Hazardous Waste", and a start accumulation date.
- Containers must be kept in good condition.
- Containers must be compatible with waste.
- Containers must be closed during storage except when necessary to add or remove waste.
- Weekly inspections of containers and storage areas must be performed per Work Instruction.
- Ignitable/Reactive waste must be stored at least 50 feet from the property line.
- Incompatible waste must be separated by dike, berm, wall, or other device.
- Secondary containment of at least 110% of the capacity of the container must be present.
- No smoking signs must be conspicuously placed wherever there is a hazard from ignitable or reactive wastes.

Satellite Accumulation areas can be set up where necessary with assistance from a member of the AM/NS Environmental Team. To do this, the requirements in 40 CFR 262.34(c) should be followed.

### **Aerosol Can Wastes**

Aerosol cans, if partially full, must be treated as hazardous wastes. Regulatory agencies have determined that the best method to ensure cans are empty is to puncture the cans utilizing an aerosol can puncture unit. These units are designed to puncture the can, and empty the contents into a drum which then allows for the empty can to be placed with recycled metal. Only

cans that are empty (punctured) may be placed into a recycle bin. No aerosol cans should be placed in waste containers.

### **Recyclable Materials**

The following items are examples of recyclable materials and must be segregated from other wastes and recycled in the appropriate containers as further described below.

Used Oil – Oil that has not been contaminated with other solids and fluids such as coolant, hazardous waste, halogens, chlorofluorocarbons, or chlorinated paraffin's should be managed as used oil rather than waste oil. Designated used oil containers are located throughout the site. In addition, oil filters and oily rags should be discarded in special waste containers labeled for oily debris.

Cardboard recycling - There are grey Front-End Load (FEL) containers specifically modified and labeled for the handling and disposal of cardboard material are located throughout the mill. The boxes should be broken down and inserted through the slots in the front of the container.

Kraft Paper - Material generated in each roll shop should be put into the designated green roll- off labeled and used specifically for Kraft paper recycling.

Plastic Bottles and Aluminum Cans - The Administration and Social buildings have containers throughout each building. Only plastic bottles and cans are to be discarded into these containers. The containers will be labeled with the words "Plastic Bottles and Cans Only".

Scrap Metal – All scrap metal is the property of AM/NS. Contractors shall utilize existing scrap metal bins as appropriate. All scrap metal will be handled by Phoenix Services or approved AM/NS Contractor. Metals such as copper, aluminum, and other metals should be segregated from carbon steel scrap and placed in a separate bin.

Printer and Toner Cartridges -This waste stream will be sent to an entity that will recycle and/or refurbish cartridges.

Office Paper - All paper should be disposed of into the Shred-it bins located throughout each building.

## **5.0 TRAINING**

All Contractor personnel working on-site shall be trained on the content of the EMP. The Contractor shall provide the Owner written evidence of training signed by every trainee and by the training technician. Training must be completed before commencing work on the site. Training should include the following topics at a minimum:

- Site environmental program overview
- Summary of permits
- Handling, usage, and storage of chemicals
- Disposal of used/unwanted materials
- Spill response procedures
- Best management practices

Personnel handling hazardous materials or inspecting BMPs have to undergo either a special training session, including signed evidence of training, or provide a credential that they can perform the task.

### **Hazardous Material Training**

- Detailed permit requirements relating to hazardous materials
- Labeling and storage of chemicals
- Disposal of used/unwanted materials
- Spill Response Procedures
- Detailed BMP review

## **6.0 COMMUNICATION**

In the event of an environmental release, notify your supervisor immediately. Contractors' supervisors shall notify the Owner and their representatives.

### **EMERGENCY CALL LIST**

**FOR MEDICAL EMERGENCIES DIAL 4911 from a cell phone or 251-289-4911**

<b><u>AM/NS Environmental Department</u></b>	<b><u>Office / Mobile</u></b>
Ralph Lopez	(251) 289-4160 / (251) 225-1423
Brantley Rutledge	(251) 289-4114 / (251) 391-4118
Olivia Hernaez	(251) 289-4385 / (251) 944-7131
Robert Pinckard	(251) 289-4424 / (251) 214-6895
Steve Stewart	(251) 289-3319

### **REGULATORY AGENCIES**

National Response Center (NRC)	1-800-424-8802
Mobile County EMA	(251) 460-8000
Alabama (State) EMA (AEMA)	(205) 280-2312
ADEM Central Office (Montgomery)	(334) 271-7700
ADEM Mobile Field Office	(251) 450-3400
EPA Region IV - Atlanta	(404) 562-8700
United States Coast Guard - Mobile	(251) 441-5286

## **7.0 PART 2 - ADDITIONAL ENVIRONMENTAL REQUIREMENTS**

The following section provides a synopsis of environmental regulatory requirements associated with the AM/NS site. Each Contractor will bear the responsibility of understanding the environmental regulatory requirements associated with their work and ensuring all regulatory requirements are addressed appropriately.

All Contractors shall submit an Environmental Management Plan to the Owner for review and approval before beginning their site work.

### **7.1 CONSTRUCTION NPDES PERMITTING**

Federal and State regulations for stormwater discharge require owners and operators to apply for and obtain a NPDES permit before conducting construction disturbance activities where land disturbance is one acre or greater. Permitting shall be coordinated by Owner only. In Alabama, where the State has regulatory authority to enforce stormwater management, a Construction Best Management Practices Plan (CBMPP) is required and also functions as the Storm Water Pollution Prevention Plan (SWPPP). The permit stipulates that BMPs must be implemented for prevention and control of non-point sources of pollutants during construction. The NPDES permit requires that a Qualified Credentialed Professional (QCP) prepare a CBMPP and that a Qualified Credentialed Inspector (QCI) or QCP perform regular inspections and inspections within 24 hours after rainfall events exceeding 0.75 inch.

### **7.2 SEDIMENT AND EROSION CONTROL**

When land disturbance activities are taking place, Contractors must comply with the facility's General Construction National Pollutant Discharge Elimination System (NPDES) Storm Water permit; which the Owner will maintain, administer, and report to Alabama Department of Environmental Management (ADEM). Contractor erosion and sediment control BMP plans (Erosion Control Plans) will be provided by the Contractor to the Owner for incorporation into the CBMPP.



**All contractors involved in grading, land disturbance, affecting stormwater runoff, or discharging surface or groundwater from the site shall provide for erosion control measures associated with their activities** for compliance with the NPDES permit.

### **7.2.1 Construction Best Management Practices Plan**

All land disturbance activities at the Project site equal to or greater than 1 acre in size shall be performed under the NPDES permit and CBMPP maintained at the construction site (Owner-Environmental Office). Please note that in cases where there is already a land disturbance activity greater than one acre (a construction NPDES Permit in place), all subsequent land disturbance regardless of size is subject to the NPDES Permit and CBMPP and will require a specific erosion control plan.

Each Contractor shall review the CBMPP (if applicable) and provide work area-specific erosion control plans that identify:

- Area topography
- Type of BMP to be installed
- Locations where BMPs will be installed

A list of approved BMPs is included in the site-wide CBMPP and the [Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas](#) (latest edition). The Contractor shall submit the work area-specific erosion control drawings and a narrative description of the BMPs to the Owner for review and approval before installation. Once approved, the work area-specific erosion control plans will be submitted to ADEM and incorporated into the CBMPP by the Owner. The CBMPP will be updated quarterly or as required by changes in activity onsite and submitted to ADEM.

BMP inspections of erosion and stormwater control devices will be conducted at least once every 7 days or within 24 hours of a 0.75-inch rainfall or greater event by the Contractor's QCI or QCP unless this service is contractually provided by the Owner. Inspection forms from the CBMPP are included in Appendix A. A copy of these records will be kept on-site at all times and available for review by the state or the Owner. Detailed procedures for inspections are presented in [Field Guide for Erosion and Sediment Control on Construction Sites in Alabama](#).

The Contractor will provide the Owner-Environmental with certificates of qualification of all professionals designing or inspecting the BMPs.

BMPs will be designed, constructed, monitored, maintained, inspected, and supplemented as necessary to protect sensitive areas previously identified in this report. BMPs will address:

- Waterborne transport of soil (stormwater runoff)
- Airborne transport of soil (as windborne dust)
- Physical transport by vehicles and machinery: at a minimum, truck wheel washing facilities at the site entrances will be used along with covers for trucks transporting soil or aggregate materials to and from the site
- Soil or aggregates transported on public roads must be removed or vacuumed (e.g., by road sweepers)

If polymers for flocculation of storm water or for dust control are to be used, the Contractor shall submit product information including Safety Data Sheets for approval before use.

Work areas near sensitive areas such as the wetlands, streams, riverfront, or property boundaries may require water quality sampling for turbidity at determined discharge locations. Land disturbance along the Tombigbee River will require additional measures in the Contractor's erosion control plans including, but not limited to, shoreline protection and floating turbidity barriers. Turbidity generated by construction activities near sensitive areas including waterways must not cause substantial visible contrast nor result in an increase of more than 50 nephelometric turbidity units (NTU) above background more than 400 feet from the activity. These turbidity limits also apply to return water entering waterways from dredge spoil areas.

### **7.3 NATURAL RESOURCES**

Several areas containing natural resources, including wetlands and streams, have been previously identified during on-site studies. Some of the areas will be preserved while others have been mitigated pursuant to the Section 404 Individual Permit issuance by USACE.

Approximately 162 acres of jurisdictional wetlands and buffer have been identified on the site to remain and be preserved through deed-restricted covenants. An additional 73 acres

(approximately) of wetlands has been identified to remain and are to be protected on site. Contractors that are performing land disturbance or activities within wooded areas or suspected wetlands should contact the Environmental Department prior to any activities to confirm the location of protected wetlands and other habitat. The disposal of trees, brush, and other debris in any stream corridor, wetland, or surface water is prohibited. No equipment is allowed in wetlands, streams, or other surface waters without prior written approval from the Owner.

### **7.3.1 Jurisdictional Waters**

Jurisdictional waters identified on-site that will need to be protected by Contractor during land disturbance include the following:

- Dabney Creek
- Barrows Creek
- Jurisdictional Waters of the United States
- Conservation wetlands placed in restrictive covenants
- Other Wetlands identified as “To Remain”
- Other unnamed streams, creeks, and tributaries

An Alternatives Analysis designed to reduce disturbances to jurisdictional waters was submitted as a joint Section 404/Section 10 Individual Permit application to the USACE in April 2007. No clearing, staging, or construction activities within areas subject to the jurisdictional control of USACE will begin before receipt of written confirmation from the Owner. The Contractor will not encroach into areas designated to be preserved (including buffers) without written authorization from the Owner.

### **7.3.2 Threatened and Endangered Species**

The Owner expressly prohibits the following activities on their property:

- Hunting
- Fishing
- Trapping

Contractors shall not harm or aggravate protected wildlife at the Project site. Federal- and State-protected animal species and their habitats exist on the site and adjacent waterway.

Work shall be stopped immediately and the Owner-Environmental notified if potentially dangerous wildlife is encountered on any area of the site. In case of a significant road kill incident on-site, such as deer, bears, or other large game, the Owner shall be notified in writing. In the event of an incident involving a threatened or endangered species, the Owner shall immediately be notified verbally, followed by notification in writing.

#### **7.4 CULTURAL RESOURCES**

Several areas containing cultural resources have been previously identified during on-site studies. The Contractor will take appropriate action to prevent disturbance of new cultural resources encountered during site disturbance activities.

## **8.0 ENVIRONMENTAL BEST MANAGEMENT PRACTICES**

Environmental BMPs are effective, practical, structural or nonstructural methods that prevent or reduce the movement of pollutants from the Project site to the air, land, or to surface or ground water, or which otherwise protect air and water quality from potential adverse effects of site development activities. BMPs are a combination of actions implemented to reduce the environmental impacts of certain activities and operations at the site during the construction phase of the Project.

### **8.1 LAND USE BMPS**

#### **8.1.1 Limited Site Access**

All Contractors and their subcontractors, vendors, and guests will comply with the site access and security requirements. Contractors shall ensure that all personnel entering the site under their responsibility undergo the required site safety orientation and display the appropriate identification badge. Each contractor shall ensure that personnel do not enter areas of the site beyond agreed upon limits of necessity for completing the contracted activities. Refer to the Environmental Safety and Health Manual for additional information on site security.

### **8.2 CHEMICALS USED ON PROJECT SITE**

All chemicals used by the Contractor during site construction activities will be reported to the Owner. In addition, there is a list of prohibited chemicals, cautionary chemicals, and chemicals requiring additional controls that are included in Appendix D of this plan. In the instance an exception or approval is required, contractor shall coordinate with the Environmental Department.

To meet federal, State, and local chemical reporting obligations, the following BMPs shall be met:

- The Contractor shall notify the Owner in writing of any chemical that will be brought to the project site at least seven days before the chemical arriving at the project site.
- The Contractor written notification shall include the following:

- Chemical name
  - CAS number
  - Material Safety Data Sheet (MSDS)
  - Quantity of chemical arriving on site (pounds)
  - Purpose for which chemical will be used
  - Anticipated storage time before chemical is used or disposed
- Contractor shall conduct monthly inventory of the estimated quantity of tracked chemicals remaining on site and provide the Owner with a written summary of chemicals to allow determination the actual quantity of chemicals remaining on site.

Exclusions: Chemicals that are not subject to reporting or tacking include:

- Trade chemicals that may be used in performance of a contracted service or activity
- Chemicals present in Contractor or Service vehicles that enter and leave the site each day
- Janitorial supplies

### **8.3 AIR QUALITY BMPS**

#### **8.3.1 Dust and Fugitive Emissions**

Contractors engaging in activities that could generate dust shall develop a Dust Prevention and Control Plan for submittal and review by the Owner. The plan shall: 1) identify all potential fugitive dust emission; 2) assign dust control methods; 3) determine frequency of application; 4) record all dust control activities; 5) self-monitor dust control efforts using an Inspection Checklist.

Fugitive dust control methods from conveyor transfer points and screening operations include:

Limiting drop heights of materials to ensure a homogeneous flow of material Installing, operating, and maintaining water spray bars to control fugitive dust emissions at crusher drop points as necessary; applying controls on a frequency that prevents visible fugitive emissions from exceeding applicable opacity limit

**8.3.2 Open Burning**

On-site burning is expressly prohibited.

**8.3.3 Smoke and Odors**

The Contractor will properly store and handle combustible and volatile materials that could create objectionable smoke, odor, or fumes. The Contractor shall not burn oil or refuse that includes trash, rags, tires, plastics, or other manufactured debris.

**8.3.4 Vehicle Exhaust Emissions**

The Contractor shall maintain and operate equipment in a manner that limits vehicle exhaust emissions. Equipment and vehicles will be kept within the manufacturers' recommended limits and tolerances. Excessive exhaust gases will be eliminated, and inefficient operating procedures will be revised or halted until corrective repairs or adjustments are made.

**8.4 WATER QUALITY BMPS**

Discharges of pollutants resulting from failure to implement and maintain effective BMPs are considered unpermitted discharges to State waters and are expressly prohibited from the Project site.

A "water of the state" is broadly defined as "All waters of any river, stream, watercourse, pond, lake, coastal, ground, or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely on the property of a single individual, partnership, or corporation unless such waters are used in interstate commerce."

Table 3-1 and Section 4.1 of this EMP provide permit conditions and Contractor compliance requirements associated with existing permits obtained as required by the Clean Water Act. All Contractors shall be familiar with and comply with all permit conditions associated with existing permits.

The following permits or approvals associated with the Clean Water Act are in effect for the Project site:

- NPDES Permit for Stormwater and Wastewater discharges
- State Indirect Discharge Permit (SID)
- Joint Section 404/Section 10 Permit (USACE)
- Section 401 Water Quality Certification (ADEM)
- Construction Stormwater NPDES Permit (ADEM)
- Coastal Use Permit (ADEM)

In addition to the permit conditions associated with the above permits, the following sections provide BMPs associated with discharge of pollutants to State waters.

#### **8.4.1 Dewatering**

Groundwater discharges to waters of the State associated with dewatering activities for deep construction (cellars, sumps, pits or basements, and deep foundations) and other groundwater extraction activities are covered under the Construction Stormwater NPDES Permit.

Contractors engaged in dewatering associated with deep construction activities or groundwater extraction shall develop, install, operate, and maintain BMPs associated with such releases. BMPs shall be submitted to the Owner for review and approval for further incorporation into the site-wide CBMPP. BMPs associated with dewatering shall seek to reduce site erosion and sediment discharge, dissipate discharge velocity, and ensure compliance with the regulatory requirements of the Joint Section 404/Section 10 Permit, the Section 401 Water Quality Certification, and the Construction Stormwater NPDES Permit.

Contractors engaged in dewatering or groundwater extraction activities shall also comply with the Alabama Coastal Nonpoint Pollution Control Program, as administered by ADEM. The Alabama Coastal Nonpoint Pollution Control Program provides for Alabama's implementation of the federal Coastal Zone Management Act. The focus of the Alabama



Coastal Nonpoint Pollution Control Program (ACNPPCP) is the improvement of overall water quality by management of land and water uses within the Management Area of Mobile and Baldwin counties. The ACNPPCP coordinator is located in the ADEM Coastal Programs Office in Mobile, Alabama.

#### **8.4.2 Concrete Washout Pits**

Contractors shall provide for concrete washout facilities to contain concrete and liquids when the chutes of concrete mixers and hoppers of concrete pumps are rinsed out after delivery. The washout facility shall consolidate solids for easier disposal and prevent runoff of liquids.

Concrete washout facilities may either be prefabricated washout containers or self- installed concrete washouts.

Self-installed concrete washout pits shall be built below grade to prevent breaches and reduce the likelihood of runoff. The following additional design and installation requirements apply to concrete washout pits:

- Concrete washouts shall be designed and installed to prevent leaks or breaches as a result of heavy use.
- Washouts will be sized to handle solids, wash water, and rainfall to prevent overflow.
- Concrete wash water shall not be placed in a pit that is connected to a storm drain system or that drains to nearby waterways.
- Concrete washouts shall not be located within 50 feet of storm drains, open ditches, or waterbodies.
- Concrete washout pits shall be placed in a location that allows convenient access for concrete trucks, preferably near the area where the concrete is being poured.
- Appropriate gravel or rock shall cover accessways to concrete washout facilities.
- Concrete washout pits shall be installed far enough from other construction traffic to reduce the likelihood of accidental damage and spills.

Contractors shall check all concrete washout pits daily to determine whether they have been filled to 75 percent capacity, which is when materials will be removed. Washouts shall be inspected daily to ensure that plastic linings are intact and sidewalls have not been damaged by construction activities. Inspectors shall note whether the facilities are being used regularly. If drivers have washed out their chutes or hoppers in other locations, the Contractor shall notify the Owner in writing and implement corrective measures, including remediation of affected areas, installation of additional signage, and/or placement of additional washouts in more convenient locations.

Concrete washouts are designed to promote evaporation where feasible; however, if stored liquids have not evaporated and the washout is nearing capacity, Contractors shall vacuum and dispose of them in an approved manner. Contractors shall remove liquids or cover the structures before predicted rainstorms to prevent overflows.

## **8.5 NOISE BMPS**

Construction work hours shall comply with times specified in the Project and contract documents. The Contractor shall make every effort to ensure noise mitigation methods are used when working near the property boundary or near inhabited areas including, but not limited to, the City of Calvert. BMPs will include:

- Noise control equipment on equipment (mufflers, silencers, etc.)
- Limiting night work activities for some activities such as excessive vehicle movement
- Contractor shall ensure all equipment noise control devices are always in good working order

The Contractor shall cooperate with the Owner as necessary to revise schedules and work activities if noise complaints are received from local residents. Such methods are not expected to delay the schedule or incur additional costs to the Owner.

## **8.6 IMPORT FILL MATERIAL QUALITY CONTROL**

Only imported fill material demonstrated to be free of contamination and appropriate for the proposed use shall be used on the Project site.

Imported fill source material shall be from a fill source area located in a nonindustrial area and free from contamination. Nonindustrial sites include those that were previously undeveloped or used solely for residential or agricultural purposes. If the fill material is from an agricultural site, the fill shall be demonstrated to be free of pesticides and/or heavy metals.

Undesirable sources of fill material include:

- Industrial and/or commercial sites where hazardous materials were used, handled, or stored
- Unpaved parking areas
- Former gasoline service stations, retail strip malls that contained dry cleaners or photographic processing facilities, paint stores, auto repair and/or painting facilities
- Metal processing shops, manufacturing facilities, aerospace facilities, oil refineries, waste treatment plants, etc.

### **Documentation and Analysis**

For imported fill material, Contractors shall provide documentation that the fill source is appropriate and/or the fill material was analyzed for potential contaminants based on the location and history of the source area. Fill documentation shall include:

- Detailed information on the previous use of the land from where the fill is taken
- Whether an environmental site assessment was performed and its findings
- The results of any testing performed
- Physical properties (laboratory results) for evaluation by Engineer of Record for structural stability

If required by the Owner, chemical analysis shall be performed in accordance with Table 8-1, based on the source of the fill and knowledge of the prior land use. (See 8-14)

Table 8-1 Analytical Requirements for Imported Fill.

Fill Source	Target Compounds	Analytical Methodology
Land near an existing highway	Lead	USEPA method 6010B or 7471A
	Polycyclic aromatic hydrocarbon (PAHs)	USEPA method 8310
Land near a mining area or quarry	Heavy metals	USEPA methods 6010B or 7471A
	pH	
Agricultural land	Pesticides	Organochlorine: USEPA methods 8081A or 8080A Organophosphorus: USEPA method 8141A Chlorinated herbicides: USEPA method 8151A
	Heavy metals	USEPA methods 6010B or 7471A
Residential	Volatile organic compounds (VOCs)	USEPA method 8021 or 8260B (sample collection by USEPA method 5035)
	Semivolatile organic compounds (SVOCs)	USEPA method 8270C
	Total petroleum hydrocarbon (TPH)	Modified USEPA method 8015
	Polychlorinated biphenyls (PCBs)	USEPA method 8082 or 8080A
	Heavy metals (including lead)	USEPA methods 6010B or 7471A
	Asbestos	OSHA method ID-191
Acceptable Commercial	VOCs	USEPA method 8021 or 8260B (sample collection by USEPA method 5035)
	SVOCs	USEPA method 8270C
	TPH	Modified USEPA method 8015
	PCBs	USEPA method 8082 or 8080A
	Heavy metals (including lead)	USEPA methods 6010B or 7471A
	Asbestos	OSHA method ID-191

Source: California DTSC Information Advisory, October 2001

Detectable concentrations of compounds of concern within the fill material shall be demonstrated to be either below the background soil concentrations of the Project site or shall be evaluated for risk to human health and the environment in accordance with the *Alabama Risk-Based Corrective Action Guidance Manual*.

At no time shall fill containing hazardous wastes, mercury- or PCB-containing materials, or materials from sites undergoing environmental remediation be used on the Project site.

Representative samples should be collected at the borrow area while the potential fill material is still in place and analyzed before removal from the borrow area. An appropriate number of samples shall also be determined based on the approximate volume or area of soil to be used as fill material. **Table 8-2** provides the recommended fill material sampling schedule.

Table 8-2 Soil Fill Material Sampling Schedule.

<b>Area of Individual Borrow Area</b>	<b>Sampling Requirements</b>
2 acres or less	Minimum of 4 samples
2 to 4 acres	Minimum of 1 sample per ½ acre
4 to 10 acres	Minimum of 8 samples
Greater than 10 acres	Minimum of 8 samples with 1 additional sample per acre (>10 acres)
<b>Volume of Borrow Area Stockpile</b>	<b>Samples per Volume</b>
Up to 1,000 cubic yards	1 sample per 250 cubic yards
1,000 to 5,000 cubic yards	4 samples for first 1,000 cubic yards + 1 sample per each additional 500 cubic yards
Greater than 5,000 cubic yards	12 samples for first 5,000 cubic yards + 1 sample per each additional 1,000 cubic yards

Source: California DTSC Information Advisory, October 2001

Fill material that is not characterized at the borrow area shall be stockpiled off-site until the required analyses have been completed and the material has been accepted for on-site fill by the Owner. Should contaminants exceeding acceptable criteria be identified in the stockpiled fill material, that material will be deemed unacceptable and new fill material will be obtained, sampled, and analyzed.

Composite sampling for fill material characterization may be acceptable to the Owner, depending on the quality and homogeneity of the source/borrow area and compounds of concern. At no time shall volatile or semi-volatile constituent samples be composited.

Non-soil materials (i.e., recycled asphalt or concrete, fly ash, etc.) may also be acceptable for on-site placement, provided they are demonstrated free of contamination and appropriate for their intended use. Import and placement of non-soil materials on the Project site requires the approval of the Owner before materials are brought on-site. Contractor shall submit sampling schedule and analytical testing proposed for non-soil fill materials to Owner for approval.

## **9.0 INSPECTIONS, DOCUMENT CONTROL, AND REPORTING**

### **9.1 ACTIVITIES TO BE INSPECTED**

Where required, specific, detailed ADEM, USACE, or Owner supplied inspection forms will be used as appropriate for particular environmental elements. Inspection forms will include checklists, photographs, and other appropriate records. Inspection forms are included in Appendix A.

### **9.2 SCHEDULE**

Environmental inspections will be performed periodically by the Owner.

### **9.3 DOCUMENT CONTROL**

All documentation related to environmental issues shall be maintained by the Contractor. The Contractor shall make all documents available for inspection and copying by Owner or his designated representative if so requested. Contractor shall submit documents to the Owner and/or his designated representative as specified in this plan.

One copy of all environmental documentation will be kept on-site at all times.

### **9.4 REPORTING**

The Contractor shall prepare and maintain environmental reports and submit it to the Owner for review or upon request. The report will include all inspection reports, wastes generated (types and volumes), waste manifests, and incident reports, if any.

## **10.0 CORRECTIVE ACTION FOR NON-COMPLIANCE**

If it is determined that the Contractor is not complying with the BMPs associated with his work activities, or if the Contractor engages in work practices that jeopardize compliance with the environmental goals and requirements of any permits, the Owner may suspend the work activities of the Contractor until all non-compliant issues are addressed and a commitment is obtained from the Contractor that he will abide by all applicable BMPs in the future.

The Owner will issue Environmental Deficiency Reports to Contractor when a deficiency is noted or reported that jeopardizes compliance with environmental permit requirements or regulations. Environmental Deficiency Reports shall be addressed or corrected in a timely manner as specified in the deficiency report. Once the deficiency has been corrected or addressed, the Contractor will respond in writing to AM/NS Environmental Department.

If an environmental deficiency is identified that poses an immediate danger to either to the environment or to workers, Contractors shall stop work immediately until the danger has been removed or eliminated.

## 11.0 REFERENCES

ADEM. 2017. *Alabama Environmental Investigation and Remediation Guidance*. Revised February 2017.

[www.adem.state.al.us/LandDivision/Guidance/AEIRGInvestigation.pdf](http://www.adem.state.al.us/LandDivision/Guidance/AEIRGInvestigation.pdf)

ADEM. 2017. *Alabama Risk-Based Corrective Action Guidance Manual*. April 2008 (Revised February 2017).

[www.adem.state.al.us/LandDivision/Guidance/ARBCAApril 2008final.pdf](http://www.adem.state.al.us/LandDivision/Guidance/ARBCAApril 2008final.pdf)

Alabama Soil and Water Conservation Committee. 2014. *Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas*, June 2003 (Revised September 2014). [http://www.swcc.state.al.us/erosion\\_handbook.htm](http://www.swcc.state.al.us/erosion_handbook.htm)

Alabama Soil and Water Conservation Committee and Partners. 2015. *Field Guide for Erosion and Sediment Control on Construction Sites in Alabama*. June 2015.

[http://swcc.state.al.us/handbook\\_fieldguide.htm](http://swcc.state.al.us/handbook_fieldguide.htm)

California Department of Toxic Substances Control. 2001. Information Advisory, Clean Imported Fill Material. October 2001.



**12.0 REVISION LOG**

<b>Revision No.</b>	<b>Revision Date</b>	<b>Nature of Revision</b>	<b>Approval</b>
01	3/11/2020	Following Changes: <ul style="list-style-type: none"><li>• Minor wordsmithing</li><li>• Section 3.0 – added ISO 14001:2015</li><li>• Section 6.0 – updated environmental staff</li><li>• Added Section 12 – Revision Log</li></ul>	S. Stewart

**APPENDIX A  
INSPECTION FORMS**

# Environmental Incident Report



Team Member reporting incident		Date/Time Incident Occurred	
Date/Time Reported to Environmental		Department/Mill	
Contractor Company (if applicable)		Specific Location	
<b>Incident Category</b>			
Air Quality <input type="checkbox"/>		Waste <input type="checkbox"/>	
Water (Wastewater/Stormwater) <input type="checkbox"/>		Spill(s) <input type="checkbox"/>	
Other <input type="checkbox"/>		If other, please describe:	
Detailed Description of Incident:		If spill, reference Spill Response WI Doc.#3704 and complete following:	
		Material spilled: _____ Estimated amount spilled: _____ Area spill reached, check all that apply: <input type="checkbox"/> Ground (Dirt, Rock, etc.) <input type="checkbox"/> Stormwater drainage <input type="checkbox"/> Impermeable Surface (Concrete, etc.) <input type="checkbox"/> Captured in Containment <input type="checkbox"/> Other: _____	
Root Cause:			
Corrective Actions Taken:			
<b>Print, Sign, and Date Below</b>			
Team Member: _____		Coordinator/Manager: _____	
Date: _____		Date: _____	
Contractor (if applicable): _____		Environmental: _____	
Date: _____		Date: _____	
<b>ENVIRONMENTAL USE ONLY (If reportable spill, complete Agency Notification Form Doc 9383)</b>			
Reportable to Agency: Y    N		Permit No. _____	
If yes, which Agency: _____			
Date/Time Reported: _____		Comments: _____	

**APPENDIX B**

**Example Spill Prevention Control and Countermeasures Plan**

## **APPENDIX B**

### **SPCC PLAN REQUIREMENTS**

This appendix outlines the minimum requirements of the Spill Prevention, Control, and Countermeasures Plan (SPCC Plan) that shall be prepared and submitted by each contractor before mobilizing any fuel storage on AM/NS Property. The following information is provided for the convenience of each contractor and is intended to address each of the components in USEPA 40 CFR 112. The attached example SPCC Plan may not be updated to any revisions to the 40 CFR Rule. Each contractor is responsible for reviewing the latest promulgated rule 40 CFR 112 and providing an SPCC Plan that meets or exceeds USEPA's requirements and those established by AM/NS Calvert.

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## **1.0 CERTIFICATION AND APPROVAL**

### **1.1 ENGINEERING CERTIFICATION [40 CFR 112.3(D)]**

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR Part 112, attest that the elements of this integrated plan attributable to SPCC requirements have been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and established schedule for inspections and testing that is adequate for this facility. This certification in no way relieves the owner or operator of their duty to fully implement this plan in accordance with 40 CFR Part 112.

\_\_\_\_\_  
Name of Professional Engineer

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Registration Number

\_\_\_\_\_  
State

\_\_\_\_\_  
Date

Seal



### **1.2 SPCC PLAN AMENDMENTS [40 CFR 112.5(A)]**

This plan must be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a release of oil or hazardous substance. Examples of changes that may require amendment of this Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operating procedures. Plan amendments must be



made within six months of the occurrence of such changes and any necessary revisions to facility implementation measures required at 40 CFR Part 112 should occur no later than six months following Plan amendment.

### 1.3 REGULAR SPCC PLAN REVIEW [40 CFR 112.5(B)]

The owner or operator must complete a review and evaluation of the SPCC plan elements at least once every five years. Evidence of these reviews shall be recorded in the plan. Table 1.3- 1 identifies the dates this plan has been reviewed, amended or modified.

**Table 1.3-1: SPCC Plan Review**

Signature	Date

### 1.4 MANAGEMENT APPROVAL OF SPCC PLAN [40 CFR 112.7]

This SPCC Plan is fully approved by the management of (Contractor) and the necessary resources have been committed to fully implement the Plan as described herein.

Authorized Facility Representative: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## 2.0 INTRODUCTION

Spill Prevention, Control, and Countermeasures (SPCC) plans for facilities are prepared and implemented as required by U.S. Environmental Protection Agency (USEPA) regulations contained in Title 40, *Code of Federal Regulations*, Part 112 (40 CFR 112). A non- transportation related facility is subject to SPCC regulations if:

1. Due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters of the United States;
2. The total aboveground oil storage capacity exceeds 1,320 gallons (calculated total of containers with capacity of 55 gallons or more); or
3. The completely buried storage capacity of oil exceeds 42,000 gallons unless the tanks and associated piping are regulated under 40 CFR Part 280 or 281.

The SPCC plan is not required to be filed with USEPA, but a copy must be available for on-site review by the Regional Administrator during normal working hours if the subject facility is attended at least 4 hours a day. The USEPA Regional Administrator and the Alabama Department of Environmental Management (ADEM) may request a copy of the Plan along with the other information specified in 40 CFR 112.4 if either of the following occurs:

1. The facility discharges more than 1,000 gallons of oil into or upon navigable water of the United States or adjoining shorelines in a single event or
2. The facility discharges more than 42 gallons of oil in each of two discharge events within any 12-month period.

The SPCC plan shall be amended within 6 months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's discharge potential. The plan must be reviewed once every 5 years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a discharge event and has been proven in the field. All technical amendments must be certified by a registered professional engineer. Owners and operators failing or refusing to comply with these federal regulations are liable to a Class I civil penalty of \$10,000 per violation (up to a maximum assessment of \$25,000) or a Class II penalty of up to \$10,000 per day of violation (up to a maximum assessment of \$125,000) plus a 10 percent increase assessed cap for Class I and Class II penalties.

If the owners and operators of a facility required to prepare an SPCC plan are not required to submit a facility response plan, the SPCC plan should include a signed certification of substantial harm criteria form as provided at 40 CFR 112. This form can be found in **Appendix A** of this Plan. A list of historical spills and releases as required at 40 CFR 112(a) is provided in **Appendix B**.

## 2.1 CONFORMANCE WITH APPLICABLE REQUIREMENTS [40 CFR 112.7(A)]

The construction site includes storage of oil or oil products in quantities which require the preparation of an SPCC Plan as set forth at 40 CFR Part 112. Contractor will comply with all applicable requirements set forth at 40 CFR Part 112 consistent with the times established under this regulation. At the time this plan was prepared, USEPA has indicated intentions to further clarify and potentially modify portions of this rule. Any additions or modifications to current facility equipment, provisions, or practices are described within the subsequent sections of this Plan. Table 2.1-1 lists areas in which this plan currently deviates from the requirements set forth under 40 CFR Part 112.

**Table 2.1-1: Deviations from SPCC Requirements**

Regulation Reference	Deviation	Equivalent Protection Measures

**Table 2.1-1: Deviations from SPCC Requirements**

Regulation Reference	Deviation	Equivalent Protection Measures
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## 2.2 FACILITY INFORMATION

**Facility Name:** [Construction Coordinator Work Area]

**Street Address:** 1 AM/NS Way, Calvert, Alabama

**Table 2.2-1: Facility Management**

Association	Name	Contact Name	Contact Numbers
[Construction Coordinator]			
[Contractor]			

### Location

The project site is located at 1 AM/NS Calvert Drive in Calvert, Alabama. (Insert reference to attached figure i.e. USGS topographic map) The center of the construction work activity is N \_\_\_\_\_ latitude and W \_\_\_\_\_ longitude. A facility drainage map including container locations and loading points is provided in **Appendix C**.

The project site consists of primarily an industrial construction site. Sparsely populated commercial and residential areas are located to the north and northwest. The site is bordered to the east by the Tombigbee River. Primarily undeveloped timberland is located south of the project site amongst unnamed tributaries.

### Facility Description

The AM/NS Calvert site covers approximately 2,380 acres of relatively hilly, well-drained terrain. The facility building envelope consists of approximately 970 acres. It is bounded by undeveloped timberland including wetlands and unnamed tributaries on the south, U.S. Highway 43 on the west, Tombigbee River on the east, and by Outokumpu Stainless and sparsely residential developed property on the north. The site terrain has relatively hilly topography, with the majority of the facilities being located on top of the hill and slopes downward relatively steep towards the north, east, and west.

## **2.3     CONTAINMENT AND SPILL PATHWAYS [40 CFR 112.7(B, C)]**

Table 2.3-1 identifies secondary containment volumes and the anticipated discharge pathway (if any) for spills from oil and hazardous substance storage.

**Table 2.3-1: Material Storage and Potential Discharge Volumes and Pathways**

TANK I.D.	STORAGE VOLUME (gallons)	CONTENTS	SECONDARY CONTAINMENT VOLUME (GALLONS)	SPILL DISCHARGE DIRECTION	ESTIMATED RELEASE VOLUME (GALLONS)	DISCHARGE RATE (GALLONS/MINUTE)
<b>Storage Tanks (ASTs)</b>						
<b>Drums/Totes/Containers</b>						

## **2.4 DEMONSTRATION OF PRACTICABILITY [40 CFR 112.7(D)]**

Describe any areas where secondary containment or other SPCC requirements are impractical. In such cases, clearly explain why such measures are not practicable; for bulk storage containers, commit to conducting both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under 40 CFR 112.20, provide in your Plan the following:

- An oil spill contingency plan following the provisions of part 109 of 40 CFR 112.7 (D).
- A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

### **OR**

Facility management has determined that use of the containment and diversionary structures or readily available equipment to prevent discharged oil from reaching navigable water is practicable and effective at this facility.

## **2.5 INSPECTIONS, TESTS, AND RECORDS [40 CFR 112.7(E)]**

### **Inspections**

The facility will inspect for malfunctions, deterioration, operator errors, leaks, damage, discharge, or corrosion of SPCC-regulated valves, pumps, tanks, piping, oil storage and handling equipment, and spill prevention equipment. These items will be checked to minimize the possibility of spills of oil and hazardous substances. The inspections will be conducted at least once per month.

A list of equipment and areas where detailed inspections may be necessary, along with recommended inspection schedules, is given below. Copies of the facility inspection forms are included in **Appendix E**.

1. Aboveground storage tanks (ASTs) (including totes and drums) containing oil or hazardous substances will be examined visually by a competent person (an individual familiar with the inspection requirements of this Plan and trained in the inspection techniques required to identify potential release situations) to determine their condition and the need for maintenance or

repair. Such examination will include aboveground foundation and tank structural supports. The outside of the tanks will be checked/inspected for signs of deterioration; leaks from seams, rivets, bolts, and gaskets; and accumulation of oil or hazardous substances inside containment structures. ASTs may need to be subjected to periodic integrity testing if routine visual inspections are not adequate.

2. Process equipment (e.g., transformers) containing oil will be visually examined on a quarterly basis by a competent person to determine their condition and the need for maintenance. The outside of the units will be observed for signs of deterioration; leaks from seams, rivets, bolts, and gaskets; and accumulation of oil.
3. Aboveground valves and piping will be examined once per month to determine the general condition of items such as supports, flange joints, expansion joints, valve stems and bodies, and drip pans.
4. Containment areas (including spill pallets) will be inspected at least once per month for accumulation of oil or hazardous substances and to determine the source. Visual inspections will be performed at least once per month to ensure the integrity of containment structures.
5. Spill kits will be inspected once per month to ensure that they remain in the most appropriate locations and that their contents are stocked and appropriate to the spill hazards in the area.

### **Inspection Records**

Inspections will be documented and a written record of inspection, signed or initialed by an appropriate supervisor or the Environmental Manager, will be made a part of the SPCC Plan. Inspections will be recorded on forms located in **Appendix E** and will be maintained for a minimum of 3 years.

## **2.6 PERSONNEL TRAINING AND DISCHARGE PREVENTION [40 CFR 112.7(F)]**

Appropriate Contractor personnel shall be instructed in the operation and maintenance of oil pollution prevention equipment and pollution control laws and regulations. The Contractor is responsible at the project site for coordinating spill prevention and response measures, including training on oil discharge prevention.

Yearly discharge prevention briefings will be provided by the Contractor for appropriate operating personnel to ensure adequate understanding of the SPCC plan. These briefings should highlight the following:



- Past discharge events or failures and recently developed precautionary measures
- Procedures (e.g., loading/unloading) required by the plan
- Areas where equivalent protection measures are in place
- Release response procedures
- Release reporting procedures
- Procedures for disposal of recovered materials
- Spill response material use and locations
- Any other areas deemed appropriate by the Spill Response Coordinator (SRC)

Records of these discharge prevention training events shall be provided to Environmental and kept for a minimum of three years by each Contractor (an example training log is provided in **Appendix B-2**). External communication of spills will typically be performed by the Owner - Environmental.

## **2.7 RESPONSE TO A RELEASE [40 CFR 112.7(F)]**

In the event of a release, Contractors shall follow the Environmental Release protocol provided in **Figure \_\_\_\_\_**.

In the event of a spill or release of oil or hazardous substance at the project site, the following procedure will be observed:

1. Any person noticing or suspecting a release should contact the Facility Security, Owner - Environmental (see **section entitled COMMUNICATION of Site-Wide Environmental Management Plan**).
2. The person making the initial report should provide as much information as possible including:
  - Substance spilled and approximate amount
  - Location and source of spill
  - Approximate time spill began, or time first noticed
  - Status of release (ongoing or controlled)
  - Potential threat to human health or the environment (soils, groundwater, surface water)
3. Personnel at the scene of the spill shall cease activities and take whatever means are safe and available to restrain further spillage and contain the materials that have been released. The individual(s) providing initial response should first identify any clear health hazards

and take appropriate measures to avoid personal injury before beginning any response actions. In no event should an employee attempt any action if unfamiliar with the material spilled, or if any reasonable doubt exists concerning safety or risk of injury. Specific caution should be taken before attempting to eliminate the spill source for flammable and corrosive materials, as these are the most common acute health hazards at the facility from storage of hazardous substances. Flammable materials such as gasoline or solvents pose the additional threat of fire or explosion that may endanger the lives of others present at the site and must be handled with extreme care. The need for appropriate personal protective equipment and response equipment (i.e., non-sparking tools) should be evaluated by the individual(s) that have discovered the release before beginning any response measures. Spill kits shall be located in general proximity to most major potential spill sources. The primary motivation for interim response measures by the individuals observing the spill or release is to block potential routes of entry into storm drains or other watercourse, and to prevent the contamination and interaction of different, potentially incompatible, materials.

4. After initiating preliminary containment measures as described in paragraph 3 above, personnel involved will secure the area affected and await the arrival of the Construction Coordinator – Contractor – SRC (SRC) or contact the local Fire Department if the spill has not been contained or poses an immediate threat to human health. No individual should re-enter the spill zone until the area has been secured by trained spill response personnel unless directed by the Spill Response Coordinator.
5. The Contractor – SRC may determine that cleanup activities should be conducted by the Emergency Response Contractor identified in the Contractor's SPCC Plan, depending upon the nature of the spilled substance.
6. Upon notification, the Contractor – SRC will proceed to the spill area after first ensuring Facility Security has been notified. Facility Security will be responsible for maintaining contact with the Contractor – SRC and ensuring any outside resources (Emergency Spill Response Contractor, Fire Department, etc.) are directed to the area of the spill.
7. The Contractor – SRC will be responsible for notification to the Environmental Department and will advise this office of any specific resources needed associated with the spill event. This interaction is critical in events where concern exists over the possible consequences of personnel exposure of the spilled material.
8. In all cases, the Emergency Response Contractor will be available to commit whatever resources are at its disposal to assist in response and cleanup.

9. It is the responsibility of the Contractor – SRC to determine the potential severity of an oil spill. If the Contractor – SRC determines the spill to be of a minor consequence, he or she may direct the resumption of normal activities at the site. The Contractor – SRC will take no action which endangers any employee by risk of exposure, etc., without prior consultation with the Safety and Health Office.
10. If the Contractor – SRC determines that the spill is significant, due to type or quantity of material spilled, he or she will initiate an appropriate response effort. If the Contractor does not have the internal resources available to effectively handle the spill response, the Contractor – SRC will arrange for the emergency response contractor.
11. It is the responsibility of the Contractor – SRC to determine the most effective means of cleanup and proper methods to ultimately dispose of the spilled materials. In most cases, this will mean placing the spill residue in a suitable container (e.g., drums). Specific care should be taken in the event of a corrosive spill because these materials often interact with standard steel drums.
12. All spilled materials containerized as part of a spill response will be marked as to the type and quantity of the materials contained and the date. An Environmental Spill Incident Report shall be completed and will be logged in the SPCC Plan (**Appendix** ).
13. The Contractor will be responsible for assessing and preparing any written reports or notifications required for external agencies (ADEM, USEPA, NRC, Alabama Emergency Management Agency (AEMA), etc.). Reporting or notification to regulatory agencies shall only be made by the Environmental department.

All oil or oil-contaminated materials, oily water, booms, adsorbent, etc., will be disposed of in accordance with local, State and federal solid waste disposal requirements. Soils impacted by petroleum shall be removed in accordance with ADEM regulations and guidelines. Confirmatory sampling will be performed and submitted to an accredited laboratory. Impacted soils will be disposed of in accordance with ADEM regulations and guidelines, and the completed waste manifests will be provided to the Owner. Prior to transporting impacted soils from the site, a waste profile must be completed, submitted to ADEM and landfill for approval. In addition, a site plan depicting the location of the release will be attached to any incident reports.

### **3.0 EMERGENCY RESPONSE CONTACT INFORMATION**

***(REFER TO COMMUNICATION SECTION IN ENVIRONMENTAL MANAGEMENT PLAN)***

#### **3.1 RELEASE REPORTING**

It is the responsibility of the Contractor - Spill Response Coordinator (in conjunction with the - Environmental Department) to determine whether a spill must be reported. Federal release reporting requirements set forth under 40 CFR 110, 40 CFR 302, and 40 CFR 355 are satisfied through proper completion of the reporting requirements set forth by the State of Alabama (ADEM).

#### **3.2 DISPOSAL OF RECOVERED MATERIALS**

All oil or oil-contaminated materials, oily water, booms, adsorbent, etc., will be disposed of in accordance with local, State and federal solid waste disposal requirements. [The Contractor] will be responsible for coordinating waste profiling and disposal.

#### **3.3 SPILL RESPONSE EQUIPMENT**

The Spill Response Coordinator will be responsible for re-stocking any spill kits or response materials that were consumed during a spill response event. The Spill Response Coordinator will be responsible for assessing the need for any additional spill response kits or equipment (Table 3.3-1). Spill kit locations are summarized in Table 3.3-2.

**Table 3.3-1: Equipment and Supplies**

<b>Department/Building</b>	<b>Equipment/Supply</b>

**Table 3.3-2: Spill Response Kit Locations**

Location	Contents

### **3.4 SECURITY [40 CFR 112.7(G)]**

A permanent chain-link fence surrounds the project site, preventing site access except through guarded access points. In addition, many buildings or structures have controlled access through locked doors or fencing. [Contractor to provide details of additional security measures to protect oil or oil products]

#### **Master Flow and Drain Valves**

Master flow valves and drain valves, where provided for secondary containment structures, shall be maintained in a closed position when in non-operating or non-standby status.

#### **Starter Controls**

All pumps at the site shall have restricted access.

#### **Loading/Unloading Connections**

Loading connections for tanks and piping shall be capped and locked when not in service or when in standby service for an extended time.

#### **Lighting**

Lighting shall be adequate in areas where oil is stored such that spill identification and response during nighttime hours will not be significantly inhibited. In areas that do not have adequate lighting, secondary containment should be implemented.

### **3.5 TANK TRUCK UNLOADING RACK [40 CFR 112.7(H)]**

When this plan was prepared, USEPA had not clearly defined which types of unloading equipment would be construed as a rack. Current guidance suggests that a “rack” would be a

hard piped connection point for loading or unloading multiple oil containing tanks. The project site does not currently have any loading connections that are connected to multiple tanks. Based upon this interpretation, the requirements set forth under 40 CFR 112.7(h) are not applicable to the Project Site at this time. The primary requirement under 40 CFR 112.7(h) is for secondary containment for the loading or unloading tanker truck or rail car.

The Contractor shall include any requirements set forth under 40 CFR 112.7(h) if future guidance or clarifications on this matter from USEPA suggests the unloading connections at the Project Site are covered under the definition of a rack. The non-applicability of 40 CFR 112.7(h) does not impact the requirement set forth under 112.8(b)(4) to prevent spills or releases from leaving the facility, including spills that may occur in an unloading area. Additional measures such as formal unloading procedures, nearby spill response equipment, or other preventative steps may be warranted for unloading areas located near streams, storm drains or other spill pathways.

### **3.6 BRITTLE FRACTURE EVALUATION [40 CFR 112.7(I)]**

No field-constructed aboveground containers for oil or hazardous material storage will be allowed at the Project Site.

### **3.7 CONFORMANCE TO APPLICABLE REQUIREMENTS [40 CFR 112.7(J)]**

The State of Alabama does not have regulations in place that supersede federal SPCC requirements set forth under 40 CFR Part 112. However, Alabama has additional oil and hazardous substance reporting requirements set forth under ADEM Admin. Code § 335-14.

### **3.8 FACILITY DRAINAGE [40 CFR 112.8(B)]**

#### **Drainage from Diked Storage Areas**

When drain valves are present on outdoor secondary containment system, valves shall be kept in a closed position except while uncontaminated precipitation is being released. Locks should be used to secure the valves closed. All releases of diked precipitation must be documented. A form to document releases of uncontaminated precipitation is provided in **Appendix\_\_\_\_\_**. The Contractor ES&H representative will be notified prior to any release of diked precipitation.

## **Valve Types**

All valves used as part of secondary containment structures shall be gate valves or ball valves and must be manually opened or closed.

## **Drainage from Undiked Areas**

The project site is located on over 1,600 acres of land, which is predominantly hilly and unpaved. To provide equivalent protection as required under 40 CFR 112.7(a)(2), Contractor personnel will undertake a monthly inspection regimen for all oil storage containers and implement a training program to inform oil handling employees of the risks from oil spills. Portable fuel tanks and containers will be stored as far as practical from open storm drains. Where practical, oil storage containers will be stored inside and away from storm or sewer drains. Spill kits will be located near points of major oil storage. Storm drains will be covered with a temporary mat when unloading operations are conducted nearby.

## **Treatment of Drainage**

Currently, no treatment systems require the use of a pump.

### **3.9 BULK STORAGE CONTAINERS [40 CFR 112.8(C)]**

The following definition of Bulk Storage Containers established at 40 CFR 112.2 is provided for clarity:

*“Bulk storage containers” means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil- filled electrical, operating, or manufacturing equipment is not a bulk storage container.*

## **Compatibility**

All bulk storage containers used at the Project Site shall be compatible with the material which they store.

## **Secondary Containment**

Secondary containment sufficient to contain a release from the largest container within a diked storage area (including precipitation allowance for outdoor storage) will be provided for all bulk oil storage containers at the Project Site. Calculations of containment volumes shall be provided and included in the Contractor's SPCC Plan.

## **Diked Area Drainage**

Precipitation from diked storage areas is only released after inspection of the water to confirm the absence of contamination. These inspections will be recorded on a form that meets or exceeds the information on the example form provided in **Appendix**

## **Integrity Testing**

Aboveground storage tanks and associated piping may be subject to integrity review as provided at 40 CFR 112.8(c)(6). In accordance with USEPA guidance, non-destructive integrity testing of shop-built containers less than 30,000 gallons is not necessary, and integrity can be verified through a combination of visual inspections and other integrity verification methods. Records of regular inspections of the tank conditions, including foundation, corrosion, or other signs of deterioration are recorded in **Appendix**.

## **Fill Gauges**

All oil storage tanks filled at the construction site shall have visual fill gauges installed. Oil containers (including any drums or totes that do not have fill gauges) at the site will be filled only when the pump attendant (or individual controlling the addition of liquid to the container) has a clear visual sight line to the fill gauge or into the tank, or when an assistant has a clear visual sight line to the fill gauge or into the tank and is able to communicate immediately with the pump attendant. Any faulty fill gauges will be repaired or replaced promptly.

## **Effluent Treatment Facilities**

No effluent treatment facilities are currently at the site.



## **Visible Discharges**

Oil leaks from tanks, containers, or equipment shall be promptly repaired or corrected. Accumulation of oil inside diked areas will be promptly removed via vacuum collection or oil adsorbent materials.

## **Mobile Oil Storage Containers**

When this plan was prepared, 40 CFR Part 112 required the use of secondary containment for storage of mobile tanks. USEPA has indicated it would be revisiting and potentially amending the requirements associated with providing secondary containment for mobile tanks. Until USEPA finalizes the SPCC rule regarding this requirement, the facility must undertake measures consistent with the general spill prevention provisions set forth at 40 CFR 112.1(b). These measures will consist of the following restrictions for the portable tank:

- Locate tank as far as practical from a storm drain or open watercourse.
- When possible, park truck empty or with minimal fuel stored in tank.
- Locate a spill kit nearby with spill response equipment of sufficient quantity and quality to mitigate a release from the tanker.
- Inspect the tank for signs of a release during routine monthly SPCC inspections.

Upon finalization of the requirements set forth under 40 CFR 112.8(c)(11) by USEPA, the facility may be required to install secondary containment or other equivalent protection method consistent with the provisions set forth under 40 CFR 112.7(c) and (d) for the mobile tanker truck.

## **3.10 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESSES [40 CFR 112.8(D)]**

### **Buried Piping**

There is no buried oil piping intended for construction activities at this time. All piping associated with aboveground storage containers (for fueling) shall be located aboveground. Any future installation of underground piping associated with aboveground containers will conform to the corrosion prevention standards set forth at 40 CFR Part 280 or equivalent standards established by the ADEM.

### **Piping Transfer Connections**

All loading connections will be labeled and capped or blank-flanged when not in use.

### **Piping Supports**

All pipe supports will be properly designed to minimize abrasion and corrosion and to allow for expansion and contraction where necessary.

### **Inspection of Piping**

All aboveground piping, valves, and appurtenances will be inspected monthly as part of the facility's regular SPCC inspection regiment. All piping associated with aboveground storage containers will also be located aboveground. Any future installation of piping associated with oil storage containers will be reviewed prior to installation.

### **Warning Signs**

There will be no aboveground piping runs in areas subject to impact from vehicular traffic. A warning sign or equivalent communication method will be posted at the entrance or in areas where aboveground piping containing oil is present.

### **Responsibilities in Case of Violation**

In case of violation of any of the requirements by the Contractor, or their designated subcontractors, as described above, the following procedures will be implemented by the Construction Coordinator and/or Contractor.

If a violation of the stated procedures or federal, State, or local regulations occurs related to an environmental compliance requirement described in this SPCC, the Construction Coordinator will be contacted immediately by the appropriate field personnel responsible for monitoring compliance with this EMP. The Environmental department will then be contacted immediately by the Construction Manager and a description of the violation will be provided. Proposed remedial action to be undertaken and timely followup results of the remedial action will be provided in writing to the Owner by the Contractor. **Work activities may be suspended as a result of violations at the discretion of the Owner or regulatory officials.**

## CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

Facility name: **AM/NS Calvert (Calvert Site) – Work Area** \_\_\_\_\_  
**[Contractor Name]**

Facility address: **1 AM/NS Way, Calvert, Alabama**

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 oil 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) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.  
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 Attachment C-III to this appendix or a comparable formula<sup>1</sup>) such that a discharge from the facility would shut down a public drinking water intake<sup>2</sup>?  

<sup>1</sup> If a comparable formula is used documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

<sup>2</sup> For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR §143.2(c).

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 discharge 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 (please type or print): \_\_\_\_\_ Date: \_\_\_\_\_

## Diked Area Release Log

Area Name	Date	Oil or Sheen Present (Y/N)	Release Time		Valve Closed When Complete (Y/N)	Initials	Comment
			Start	Stop			

This record will be completed when rainwater from diked areas is drained into a storm drain or into an open watercourse, lake, or pond, or onto the ground. The bypass valve normally should be sealed closed and only opened and resealed following drainage under responsible supervision.

**SPCC Plan Cross Reference [40 CFR 112.7]**

Applicable	Section	Citation	Description
<b>§112.1 General Applicability</b>			
	3.2		Operator's and owner's address and telephone numbers
	3.2		Facility contacts with telephone numbers
	3.2		Day-to-day operations and facility background
	3.4		Receiving water/Probable flow paths
	3.1	§112.1(b)	Facility subject to Part 112
<b>§112.3 Requirement to Prepare and Implement a Spill Prevention, Control, and Countermeasure Plan</b>			
	3.1	§112.3	The facility is required to prepare, in writing, a Spill Prevention, Control, and Countermeasure Plan.
	1.1	§112.3(d)	A licensed Professional Engineer has reviewed and certified the Spill Prevention, Control, and Countermeasure Plan. The engineer attests that 1) he/she is familiar with requirements of Part 112, 2) he/she or agent has visited and examined the facility, 3) the Plan has been prepared in accordance with good engineering practices, 4) procedures for inspections and testing have been established, and 5) the Plan is adequate for the facility.
	2.1	§112.3(e)	A copy of the Plan is maintained at the facility and is available for the Regional Administrator to review.
<b>§112.7 General Requirements for Spill Prevention, Control, and Countermeasures Plans</b>			
	3.1	§112.7(a)(1)	Discuss facility's conformance with Part 112.
	3.1	§112.7(a)(2)	Comply with the requirements of Part 112.
	3.2	§112.7(a)(3)	Describe physical layout (with diagram), which marks the location and contents of each container and includes transfer stations.
	3.3	§112.7(a)(3)(i)	Address the type of oil in each container and its storage capacity.
	4	§112.7(a)(3)(ii)	Address discharge prevention measures, including procedures for the routine handling of products.
	3.3	§112.7(a)(3)(iii)	Address discharge and drainage controls (secondary containment) around containers and procedures for the control of discharge.
	4.3 – 4.7	§112.7(a)(3)(iv)	Address countermeasures for discharge discovery, response, and cleanup.
	4.6	§112.7(a)(3)(v)	Address methods of disposing recovered materials.
	4.4	§112.7(a)(3)(vi)	Include contact list and telephone numbers for the facility response coordinator; NRC; cleanup contractors; and appropriate federal, state, and local agencies who must be contacted in case of a discharge.
	4.5	§112.7(a)(4)	Provide information and procedures for reporting a discharge.
	4.5	§112.7(a)(5)	Organize discharge procedures in a way that will make them readily available in case of an emergency.
	3.3	§112.7(b)	Include a prediction of the direction, rate of flow, and total quantity of oil that could be released as a result of each type of major equipment failure.
	3.3	§112.7(c)	Provide appropriate containment and/or diversionary structures.

**SPCC Plan Cross Reference [40 CFR 112.7]**

Applicable	Section	Citation	Description
	3.4	§112.7(d)	Describe and justify not meeting the containment requirements.
		§112.7(d)(1)	Include an oil spill contingency plan.
		§112.7(d)(2)	Include a written commitment of manpower, equipment, and materials to control a discharge.
	4.1	§112.7(e)	Conduct the required inspections and tests and maintain records.
	4.2	§112.7(f)(1)	Train oil-handling personnel in operations and maintenance to prevent discharges.
	4.2	§112.7(f)(2)	Designate a person responsible for discharge prevention and reporting to management.
	4.2	§112.7(f)(3)	Schedule and conduct discharge prevention briefings for oil-handlers.
	4.8	§112.7(g)(1)	Fully fence each oil handling, processing, or storing area, and lock/guard the facility entrance when not in operation.
	4.8	§112.7(g)(2)	Ensure that the master flow and drain valves have adequate security measures and are in the closed position when not in use.
	4.8	§112.7(g)(3)	Lock the start control on each oil pump, and have it accessible to only authorized personnel.
	4.8	§112.7(g)(4)	Securely cap or blank-flange loading/unloading connections or oil pipelines or facility piping.
	4.8	§112.7(g)(5)	Provide adequate facility lighting.
	4.9	§112.7(h)(1)	Design and install sufficient secondary containment for loading/unloading operations.
	4.9	§112.7(h)(2)	Provide adequate warning/prevention systems at the loading/unloading area to prevent vehicles from departing before transfer lines are disconnected.
	4.9	§112.7(h)(3)	Prior to filling and before tank cars/trucks depart the area, inspect for discharges of outlets to prevent liquid discharge during transit.
	4.10	§112.7(i)	Evaluate field-constructed aboveground containers that undergo maintenance for risk of discharge or failure.
	4.11	§112.7(j)	Include a complete discussion on conformance with these regulations.
<b>§112.8 Spill Prevention, Control, and Countermeasure Plan Requirements for Onshore Facilities (excluding production facilities)</b>			
	4.12	§112.8(b)(1)	Restrain drainage from diked areas by valves to prevent discharge.
	4.12	§112.8(b)(2)	Use valves of manual, open-and-closed design, for the drainage of diked areas.
	4.12	§112.8(b)(3)	Design facility drainage systems from undiked areas to flow into ponds, lagoons, or catchment basins.
	4.12	§112.8(b)(4)	If facility drainage does not meet (b)(3), then design drainage systems to contain oil on-site.
	4.12	§112.8(b)(5)	Use lift pumps, if pumps are needed, for continuous treatment systems.
	5.1	§112.8(c)(1)	Ensure that the oil storage container material is compatible with its

**SPCC Plan Cross Reference [40 CFR 112.7]**

Applicable	Section	Citation	Description
			contents under operating pressure and temperature.
	5.1	§112.8(c)(2)	Provide secondary containment for the entire contents of the largest tank and sufficient freeboard to contain precipitation.
	5.1	§112.8(c)(3)	Do not allow uncontaminated rainwater to drain from the diked areas into a storm drain or other surface water system unless you meet the requirements of (i) - (iv).
	5.1	§112.8(c)(4)	Protect completely buried metal tank from corrosion.
	5.1	§112.8(c)(5)	Protect partially buried metal tank from corrosion.
	5.1	§112.8(c)(6)	Test each aboveground container on a regular schedule and when material repairs are made.
	5.1	§112.8(c)(7)	Control leakage through internal coils by monitoring.
	5.1	§112.8(c)(8)	Engineer or update each container installation in accordance with good engineering practice to avoid discharge by providing (i) high liquid level alarm, (ii) high liquid level pump cutoff, (iii) direct audible or code signal, (iv) a fast response system, or (v) regularly test liquid level sensing devices.
	5.1	§112.8(c)(9)	Observe effluent treatment facilities frequently enough to detect possible system upsets.
	5.1	§112.8(c)(10)	Promptly correct visual discharges.
	5.1	§112.8(c)(11)	Position or locate mobile or portable oil storage containers to prevent a discharge.
	5.2	§112.8(d)(1)	Provide protective coating and wrapping for buried pipes.
	5.2	§112.8(d)(2)	Cap or blank-flange the terminal connection at the transfer point.
	5.2	§112.8(d)(3)	Properly design pipe supports.
	5.2	§112.8(d)(4)	Regularly inspect aboveground valves, piping, and appurtenances.
	5.2	§112.8(d)(5)	Warn vehicles entering the facility about aboveground piping and other oil transfer operations.
<b>§112.20 Applicability of Substantial Harm Criteria Checklist</b>			
X	Apdx A	§112.20(e)	Applicability of Substantial Harm Criteria Checklist



### FACILITY INSPECTION CHECKLIST

Instructions: This inspection record will be completed every month. Place a check in the appropriate box for each item. If any response requires elaboration, do so in the Descriptions and Comments space provided. Further descriptions or comments should be attached on a separate sheet of paper if necessary.

Area of Inspection	Yes	No	N/A	Descriptions and Comments
Tank surface shows signs of leakage				
Tank damaged, rusted, or deteriorated				
Oil staining or sheen visible within containment area				
Standing water present within containment area				
Bolts, rivets, or seams are damaged				
Tank supports are deteriorated or bulked				
Tank foundation has eroded or settled				
Level gauges or alarms are inoperative				
Vents are obstructed				
Valve seals or gaskets are leaking				
Pipelines or supports are damaged or deteriorated				
Buried pipelines are exposed				
Container secondary containment has cracks or gaps or is otherwise compromised				
Loading/unloading containment area is damaged or deteriorated				
Loading/unloading area has standing water present				
Spill response kit needs restocking				
Connections are not capped or blank-flanged				
Dike drainage valves are open				
Transformers are leaking or show signs of rust or deterioration				
Fencing, gates, signs or lighting is missing or non-functional				

Remarks: \_\_\_\_\_

\_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## SPCC Training Log

Name	Date	Signature

In accordance with the requirements of 40 CFR 112.7(f), this record of discharge prevention briefings for oil handling personnel will be completed at least once every year. Each person who participated in the briefing is listed below with printed name, signature, and the date of participation in the briefing.

**APPENDIX C**  
**LIST OF BANNED CHEMICALS**

**Table C-1 – Prohibited Chemical List**

The following chemicals/substances are prohibited at the AM/NS Calvert facility unless explicitly approved in writing by the Environmental Department:

- 2-Acetylaminofluorene (2-AAF)
- Acrylonitrile
- Alpha-Naphthylamine (1-Naphthylamine)
- 4-Aminodiphenyl (4-Aminobiphenyl)
- Arsenic (Inorganic)
- Asbestos-Containing Materials (ACM)
- Benzene
- Benidine (4,4'-diaminobiphenyl)
- Beta-Naphthylamine (2-Naphthylamine)
- Beta-Propiolactone
- Bis-Chloromethyl ether
- 1,3-Butadiene
- Cadmium and materials containing at or above 0.1 percent cadmium by dry weight
- Carbon Tetrachloride
- Chloromethyl Methyl Ether (CMME)
- 1,2-dibromo-3-chloropropane (dibromochloropropane, or DBCP)
- 3-3'-Dichlorobenzidine (and its salts)
- 4-Dimethylaminoazobenzene
- Epichlorohydrin
- Ethyleneimine (aziridine)
- Ethylene Oxide (oxirane)
- Lead-containing paints and protective coatings containing more than 0.06 percent lead by dry weight
- Mercury
- Methylene Chloride (Dichloromethane, DCM) and materials containing above 0.1 percent Methylene Chloride
- 4,4'-Methylenedianiline (MDA)
- 4-Nitrobyphenyl
- N-Nitrosodimethylamine (NDMA)
- Ozone-depleting chemicals, which can include solvents, refrigerants, and foamblowing agents. These include CFCs such as R-11, R-12, R-113, R-114, R-115, R-502
- Biphenyls (PCBs)
- Polychlorinated Radio-luminescent EXIT or other signs that contain tritium or other radioactive material to illuminate during electrical power outage
- 1,1,1-trichloroethane (TCA, or methyl chloroform)
- 1,1,1-trichloroethylene (TCE, or trichloroethene)
- Vinyl Chloride (VC)

**Table C-2 - Restricted Use Chemicals (requiring additional controls in coordination with the Environmental Department):**

- Beryllium
- Chromium VI
- Formaldehyde
- Hydrofluoric Acid (HF)
- Manganese
- Methylene bisphenyl isocyanate (MDI) / 4,4' - Diphenylmethane
- Nickel
- Perchloroethylene (aka Tetrachloroethylene)
- Phenol (carbolic Acid)
- Toluene 2,4 – Diisocyanate (TDI)

**Table C-3: Cautionary Lubricants List**

The following constituent (groups) are common in lubricants and must be approved by the Environmental Department prior to use.

- Chlorinated paraffin additives
- Chlorinated solvents or BTEX content
- Biocides- especially nonyl-phenols
- Non-ionic surfactants
- Chelating agents