

## Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

### Facility Description

Facility Name Whitworth Tool, Inc.

Facility Address 114 Industrial Park Lane

City Hardinsburg State Kentucky ZIP 40143

County Breckinridge Tel. Number ( 270 )756 - 0098

Owner or Operator Name Ray Stewart, EHS Coordinator

Owner or Operator Address 114 Industrial Park Lane

City Hardinsburg State Kentucky ZIP 40143

County Breckinridge Tel. Number ( 270 )756 -0098

### I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

- I Ray Stewart certify that the following is accurate:
1. I am familiar with the applicable requirements of 40 CFR part 112;
  2. I have visited and examined the facility;
  3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
  4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
  5. I will fully implement the Plan;
  6. This facility meets the following qualification criteria (under §112.3(g)(1)):
    - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
    - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
    - c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
  7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
  8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
  - a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
  - b. Must be prepared for flowlines and/or intra-facility gathering lines which do not have secondary containment at an oil production facility, and;
  - c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature Ray Stewart

Title: EHS Coordinator

Name Ray Stewart

Date: 5/31/2022

**II. Record of Plan Review and Amendments**

**Five Year Review (§112.5(b)):**

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility, if applicable. Implement any SPCC Plan amendment as soon as possible, but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

<b>Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))</b>	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	<input checked="" type="checkbox"/>
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. [§112.6(a)(2)] [See Technical Amendment Log in Attachment 1.2]	<input checked="" type="checkbox"/>

**III. Plan Requirements**

**1. Oil Storage Containers (§112.7(a)(3)(i)):**

<b>Table G-2 Oil Storage Containers and Capacities</b>		
This table includes a complete list of all oil storage containers (aboveground containers <sup>a</sup> and completely buried tanks <sup>b</sup> ) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.		<input checked="" type="checkbox"/>
<b>Oil Storage Container</b> (indicate whether aboveground (A) or completely buried (B))	<b>Type of Oil</b>	<b>Shell Capacity (gallons)</b>
Plastic Tote (A) 2 Totes	Metalworking Fluid	250
Metal Drum (A) 1 container	Metalworking Fluid	55
Metal Drum (A) 7 containers	Lubricating Oil	385
Metal Drum (A) 4 containers	Hydraulic Oil	220
Plastic Drum (A) 1 container	Cleaner	55
Metal Drum (A) 2 containers	Rust Prevention	110
Plastic Tote (A) 4 containers	Waste Oil/ Waste Coolant	1000

**Total Aboveground Storage Capacity<sup>c</sup>**     2075     gallons  
**Total Completely Buried Storage Capacity**     0     gallons  
**Facility Total Oil Storage Capacity**     2075     gallons

<sup>a</sup> Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

<sup>b</sup> Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

<sup>c</sup> Counts toward qualified facility applicability threshold.

**2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):**

<b>Table G-3 Secondary Containment and Oil Spill Control</b>	
Appropriate secondary containment and/or diversionary structures or equipment <sup>a</sup> is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	<input checked="" type="checkbox"/>

<sup>a</sup> Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

**Table G-4 Containers with Potential for an Oil Discharge**

Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method <sup>a</sup>	Secondary containment capacity (gallons)
<i>Bulk Storage Containers and Mobile/Portable Containers<sup>b</sup></i>					
55 gallon drums	Damage to Barrel	55	Down	Concrete Shop Floor	55
250 Gallon braced plastic tote	Damage to tote	250	Down	Concrete Shop Floor	250
<i>Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)<sup>c</sup></i>					
CNC Mill or Lathe	Busted line, over fill of fluids	25-250	Down	Concrete Shop Floor	250
	Damage to tank or reservoir				
Sump Shark (sump pumper)	Busted line or damage tank	250	Down	Concrete Pad	250
<i>Piping, Valves, etc.</i>					
<i>Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)</i>					
250 Gallon braced plastic tote	Damage to tote	250	Down	Outside Conc. Pad	250
<i>Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)</i>					

<sup>a</sup> Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

<sup>b</sup> For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

<sup>c</sup> For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

**3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):**

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. [§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]	<input checked="" type="checkbox"/>
<p>The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:</p> <p>The EHS Coordinator will conduct weekly inspections of all bulk storage containers including the following:</p> <p>55 gallon drums of oils, cleaners, and rust preventatives 250 gallon totes of metalworking fluids and coolants 250 gallon totes of waste tramp oils and spoiled coolants</p> <p>The team members tasked daily with keeping machine fluids at operating capacity will inspect the following:</p> <p>55 gallon drums of oil, cleaners, and rust preventatives 250 gallon totes of metalworking fluids and coolants Machine coolant tanks and reservoirs for leaks</p> <p>The team members tasked with disposing of waste oil and coolant will inspect the following:</p> <p>Sump Sucker (sump pump) for any hose leaks or tank damage 250 gallon totes of waste oil or coolant for damage</p>	
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. [§112.7(e)]	<input checked="" type="checkbox"/>
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. [§112.7(e)] <b>[See Inspection Log and Schedule in Attachment 3.1]</b>	<input checked="" type="checkbox"/>
Inspections and tests are signed by the appropriate supervisor or inspector. [§112.7(e)]	<input checked="" type="checkbox"/>
<b>Personnel, training, and discharge prevention procedures [§112.7(f)]</b>	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. [§112.7(f)]	<input checked="" type="checkbox"/>
A person who reports to facility management is designated and accountable for discharge prevention. [§112.7(f)] Name/Title: <u>Ray Stewart, EHS Coordinator</u>	<input checked="" type="checkbox"/>
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. [§112.7(f)] <b>[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]</b>	<input checked="" type="checkbox"/>

**4. Security (excluding oil production facilities) §112.7(g):****Table G-6 Implementation and Description of Security Measures**

Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	<input checked="" type="checkbox"/>
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The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

Whitworth Tool's storage of new fluids are kept inside of the facility to prevent theft. Each of these drums or totes have drain valves installed for control of flow for our team members to safely get the appropriate amount required for the task. The 55 gallon drums are stored on a rack near the back of the building. This rack allows us to safely store the drums to prevent possible injury to our employees. The 250 gallon totes are stored in designated locations inside the facility as well.

The outside waste totes are stored on concrete pads just outside of the building. The concrete pads serve as secondary containment in case there is a spill. We allow the waste totes to remain outside, since they are not inventoried goods of value.

The CNC machines and sump shark are located inside the facility. This equipment are valuable assets to Whitworth Tool and will not be accessible to anyone except trained team members.

**5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):****Table G-7 Description of Emergency Procedures and Notifications**

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines [§112.7(a)(3)(iv) and 112.7(a)(5)]:

In the event of a discharge involving a new storage tote or 55 gallon drum, the working area will be taped off and immediately closed off to employee access. Only those team members trained in proper clean up, will be allowed in the spill area. Absorbent tubes or snakes will be laid down around the perimeter to contain the fluids from spreading any further. Floor soakers and/oil dry will also be used to clean up the spoiled liquid. The area will then be mopped when cleanup is finished. All spoiled floor soakers, oil dry, and absorbent tubes will be placed in a 55 gallon drum owned by Crystal Clean for proper disposal.

When equipment is leaking, the above steps are taken. In addition, the machine is placed out of service until proper steps are taken to repair the damages. Proper shut down of the machine or equipment is done and all Lockout/Tagout procedures are used for employee safety.

**6. Contact List (§112.7(a)(3)(vi)):**

Table G-8 Contact List	
Contact Organization / Person	Telephone Number
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) Crystal Clean	1-877-938-7948
<b>Key Facility Personnel</b>	
Designated Person Accountable for Discharge Prevention:  Ray Stewart	Office: 1-270-756-0098 Emergency: 1-502-551-6921
Jeff Rogers	Office: 1-270-756-0098 Emergency: 1-812-661-9612
Greg Hinton	Office: 1-270-756-0098 Emergency: 1-270-617-3144
Gary Conner	Office: 1-270-756-0098 Emergency: 1-270-617-0828
State Oil Pollution Control Agencies Kentucky Emergency Response Branch	1-502-564-2380
Other State, Federal, and Local Agencies EPA of Kentucky	1-800-241-1754
Local Fire Department Hardinsburg Fire Dept.	1-270-756-1931
Local Police Department Hardinsburg Police Dept.	1-270-756-2213
Hospital Breckinridge Memorial Hospital	1-270-756-7000
Other Contact References (e.g., downstream water intakes or neighboring facilities)  Breckinridge County Road Dept.	1-270-756-2269

**7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):**

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines <b>[See Discharge Notification Form in Attachment 4]:</b> [§112.7(a)(4)]	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>• The exact address or location and phone number of the facility;</li> <li>• Date and time of the discharge;</li> <li>• Type of material discharged;</li> <li>• Estimate of the total quantity discharged;</li> <li>• Estimate of the quantity discharged to navigable waters;</li> <li>• Source of the discharge;</li> </ul>	<ul style="list-style-type: none"> <li>• Description of all affected media;</li> <li>• Cause of the discharge;</li> <li>• Any damages or injuries caused by the discharge;</li> <li>• Actions being used to stop, remove, and mitigate the effects of the discharge;</li> <li>• Whether an evacuation may be needed; and</li> <li>• Names of individuals and/or organizations who have also been contacted.</li> </ul>

**8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):**

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

- A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
- Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

- (1) Name of the facility;
- (2) Your name;
- (3) Location of the facility;
- (4) Maximum storage or handling capacity of the facility and normal daily throughput;
- (5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
- (6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- (7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
- (8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
- (9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

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**NOTE: Complete one of the following sections (A, B or C) as appropriate for the facility type.**