CMWE

Work Instruction

Integrated Contingency Plan

No: GENEV-002

Date: 11/27/05

Process: Environmental

Page: 1 of 7

No: Work Sequence

- 1. There shall be an Emergency Coordinator on the premises or on call at all times.
- 2. Emergency Coordinators shall be responsible for coordinating all emergency response measures and have the authority to commit resources (incur debts) to carry out the Integrated Contingency Plan (ICP).
- 3. An attempt to contact both Emergency Coordinators (see Appendix A Emergency Contacts) shall be made as soon as possible.
- 4. One or both of the Emergency Coordinators shall report to the Facility as soon as possible.
- 5. If no Emergency Coordinator can be contacted within (15) minutes of the incident the Aluminum General Manager or Senior Vice President shall be contacted.
 - 5.1. The Senior Vice President shall be provided information regarding the incident and details of the emergency response.
- 6. The Integrated Contingency Plan should be implemented in the event of an imminent or actual spill or release of a substance (hereby referred to as "incident") that could potentially harm the health of CMWA employees, members of the community, and/ or the environment.
- 7. Immediately Upon Discovery of an Incident:
 - 7.1. Identify the source, amount, and characteristic of the released material.
 - 7.2. If initial knowledge of the source, amount, and characteristic of the released material warrants evacuation, see "GENEV-003 CMWA Emergency Action Plan" for details.
 - 7.3. If the release meets the definition of an incident, call 911 (emergency) with details.
 - 7.4. Take all reasonable measures necessary to ensure that fires/explosions do not occur, and releases do not spread until the local fire department arrives.
 - 7.5. Information gathered when calling 911 includes:
 - 7.5.1. Source, amount and characteristic of the release,
 - 7.5.2. If the release was contained by secondary containment,
 - 7.5.3. If the release reached the environment (soil, ditch, surface water, groundwater, etc.),
 - 7.5.4. If the release reached Waters of the Commonwealth.
 - 7.5.5. If the release resulted in a fire or explosion.
- 8. Emergency Control Phase Measures to be taken by Emergency Coordinator and plant personnel when responding to a drum, tote, or storage tank spill:
 - 8.1. Determine source of spill and the materials involved.
 - 8.2. Determine the hazard(s) involved and eliminate all sources of ignition.
 - 8.3. Responding members shall be properly equipped with personal protective equipment including respirators that may be needed depending on the material, location and size of the spill.
 - 8.4. Approach the leaking drum, tote or tank from upwind direction, if possible, using absorbents, pads, diking materials and neutralization agents if necessary.

CMWE

Work Instruction

Integrated Contingency Plan

No: GENEV-002
Date: 11/27/05
Process: Environmental
Page: 2 of 7

No: Work Sequence

- 8.5. Contain the spill to the smallest area possible.
- 8.6. If a tank is involved, close all valves on the tank.
- 8.7. Upright leaking drums, totes, or other containers.
- 8.8. After the spill is contained, recover, treat, or absorb spill response material.
- 8.9. Remove and properly drum spilled and absorbed materials and contaminated spill debris.
- 8.10. Clean, restore, and replace spill response equipment to its original storage locations.
- 9. Emergency Control Phase Measures to be taken by Emergency Coordinator and plant personnel when responding to fires:
 - 9.1. Only attempt firefighting if fire is in incipient stage and personal safety can be maintained. Firefighting concerns include:
 - 9.1.1. Fire may cause the release of toxic fumes.
 - 9.1.2. If the fire spreads, it could ignite materials at other locations on site.
 - 9.1.3. Fire could spread to off-site areas.
 - 9.1.4. Use of water for firefighting could result in contaminated runoff.
- 10. Emergency Control Phase Measures to be taken by Emergency Coordinator and plant personnel when responding to an explosion:
 - 10.1. If imminent danger exists that an explosion could occur, evacuate the area; see GENEV-003 CMWA Emergency Action Plan for details.
 - 10.2. If an explosion has occurred, help any injured personnel and fight fire according to Section 9.0 above.
- 11. Follow-up activities must be completed by the appropriate CMWA members once the release, fire or explosion has been properly responded to:
 - 11.1. Provide for the treating, storing, or disposing of recovered waste and/or contaminated soil resulting from the incident.
 - 11.2. Ensure that clean-up has been completed and emergency equipment is fit for use and returned to storage.
 - 11.3. Notify local, state, and federal officials before resuming operation.
 - 11.4. Submit written reports on the incident, if required to the Kentucky Department of Waste Management, U.S. Environmental Protection Agency, and Bourbon County Local Emergency Planning Committee.
 - 11.5. For all spill events, a record of the following information shall be maintained during the event, and recorded later the "Spill Reporting Record Form". See Appendix B for a copy of this form.
 - 11.5.1. "Spill Reporting Record Form" information needed includes:
 - 11.5.1.1. Name of the agency contacted,
 - 11.5.1.2. Names of persons spoken to during notification,
 - 11.5.1.3. Date and time of the call,
 - 11.5.1.4. Agencies which arrived on the scene,
 - 11.5.1.5. Persons in command of the agencies responding,
 - 11.5.1.6. Date and time of agency personal arrival.

<u>CMW</u> E	Work Instruction	No:	GENEV-002
	Integrated Contingency Plan	Date:	11/27/05
		Process:	Environmental
		Page: 3 of 7	3 of 7

No: Work Sequence

11.5.2. Completed form shall be submitted to the Safety Specialist.

11.6. If the incident has the potential to effect product delivery to the customer, a management meeting made up of Senior Vice President, General Managers, Production Managers, and anyone else they deem necessary shall meet as soon as practical after the incident.

12. Definitions-

- 12.1. Incident Any event where:
 - 12.1.1. The volume of a known Hazardous Substance(s) is spilled, or released, in excess of the Reportable Quantity (RQ) as listed under the federal Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, as amended.
 - 12.1.2. Extremely hazardous substances designated under Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986.
 - 12.1.2.1. RQ's are found at <u>EPA's Consolidated List of Lists</u>. Select the proper RQ column (column F for Extremely Hazardous Substances and column G for CERCLA substances) scroll down the list, the substances are listed in alphabetical order, and the RQ's are listed in quantities of 1; 10; 100; 1,000, 5000 and 10,000 pounds.
 - 12.1.3. Any spill or release of a substance, or combination of substances, including solid, liquid or gas/vapor, whose origin is unknown, or not clearly identified that could, or potentially harm the health of CMWA employees, members of the community and or environment.
 - 12.1.4. Pollutants or contaminants are materials that when released into the environment in a quantity, may present an imminent or substantial danger to the public health or welfare. (KRS 224.01-400)
 - 12.1.5. Release of petroleum or petroleum products, other than a permitted release or application of a pesticide in accordance with the manufacturer's instructions. Reportable quantities are 25 gallons or more of a petroleum product within a 24-hour period and 75 gallons or more of diesel fuel in a 24-hour period or any amount that creates a visible sheen on surface waters. (KRS 224.01-400)
 - 12.1.6. Products that contain chemical components such as Xylene, Sodium Nitrate (Found in Chemfose Liquid Additive & Add-3642) Hydrochloric Acid, Muriatic Acid, Sulfuric Acid, Sodium Hydroxide and Sodium Hypochlorite shall be evaluated to determine if the RQ has been exceeded in a spill.
 - 12.1.7. Any spill greater than 55 gallons shall be evaluated using the SDS and or internet to determine if the ingredients may be harmful to a member's health or the environment.

the second secon
CMWE

Integrated Contingency Plan

No: GENEV-002
Date: 11/27/05
Process: Environmental
Page: 4 of 7

No: Work Sequence

- 12.2. In addition to "incident-specific" reporting for each individual release, the facility may be required to make an additional notification to the EPA. If the facility discharges more than 1000 gallons of oil in a single discharge or discharges more than 42 gallons of oil in each of 2 discharges within a 12-month period, a report must be submitted within 60 days to the EPA Regional Administrator and the State Agency. The report should include the following:
 - 12.2.1. Name of the facility
 - 12.2.2. Name of person making the report
 - 12.2.3. Location of the facility
 - 12.2.4. Maximum storage capacity and normal daily throughput of oil
 - 12.2.5. Corrective actions and countermeasures taken (i.e. repairs, etc.)
 - 12.2.6. Description of the facility with maps, flow diagrams, topographic maps as necessary
 - 12.2.7. The cause of the discharge along with a failure analysis of the system in which the failure occurred
 - 12.2.8. Other information that the Regional Administrator may reasonably need on the discharge



Integrated Contingency Plan

No: GENEV-002
Date: 11/27/05
Process: Environmental

Page: 5 of 7

Appendix A: EMERGENCY CONTACTS

Function / Who / Company / What	Office Phone	Other Phone
Primary Emergency Coordinator Bruce Allison, General Manager Steel Division	859-987-0500 Ext. 461	859-621-2654 (Cell)
First Alternate Emergency Coordinator Wayne Mattox, Plant Services Coordinator	859-987-0500 Ext. 463	859-699-7795 (Cell)
CMWA Senior Vice President Jeff Birdsong	859-987-0500 Ext. 453	859- 621-1522 (Cell)
General Manager Aluminum Division Doug Jett	859-987-0500 Ext. 480	859- 621-7419 (Cell)
Environmental Response Cleanup Contractor Valicor Environmental Services (Oil, Coolant, & Waste Water Spills)	513-733-4666 (24 hours)	Gary Nagel 859-750-7171
Environmental Response Cleanup Contractor Bluegrass Emergency Response Team (BERT) (Hazardous Waste Spills or Release of a Gaseous Cloud)	859-744-1587 (24 hours)	859-737-9085 (fax)
Paris Fire Department	911	
Paris Police Department	911	
Paris-Bourbon County Disaster and Emergency Service	859-987-2151	
State Emergency Response Commission	800-928-2380 (24 hours)	502/564-2380
National Response Center	800-424-8802 (24 hours)	202-267-2165 (fax)
Chemtrec	800-262-8200	
Kentucky Regional Poison Center	800-222-1222	



Integrated Contingency Plan

No: GENEV-002
Date: 11/27/05
Process: Environmental
Page: 6 of 7

Appendix B: Spill Reporting Form

	Spill Repor	0	JI G I	OIIII	
Complete this form when there is ■ Any release of a substance, oth ■ Any release of a DOT hazardou Per CMWA's EMS spill threshold	ner than water, <u>o<i>utsid</i>e</u> is material greater than guidelines, reportable i	5 gallons <u>inside</u> th & non-reportable s	e Aluminu pills must	ım, or Stee be docum	ented.
Send original copy of this form to	the Sr. Safety Env. Sp	ecialist.	Sr	•	nmental Special Number:
Spill Type (Check One):	Reportable	Non-Reportab	e		
Spill Description					
Location of Spill Who Reported/Witnessed:		Date/Time	of spill		
Weather conditions if outdoors					
Name/Type of product spilled Quantity spilled	Dic	d material enter water	r? YES or	NO How	much?
Containment: Actions taken to contain or remove s	spill and effects of spill				
Explain what happened (Use addition	onal sheets if needed):				
Agencies Notified:					
Agencies Responding:					
	-				
Document Review: Note: Proced as part of the follow up on this sa			I to this s _l	oill must b	e reviewed
as part of the follow up on this s	pill. List the documents	reviewed below:			
	pill. List the documents	reviewed below:			e reviewed No
as part of the follow up on this sp Do any of the document s listed abo	pill. List the documents	reviewed below:			
as part of the follow up on this sa Do any of the document's listed abo if yes, List those being change: Champion for document change(s)?	pill. List the documents	s reviewed below:			
as part of the follow up on this sp Do any of the document's listed about fyes, List those being change:	pill. List the documents ove require revision due to Actual comp	s reviewed below:			
as part of the follow up on this sp Do any of the document s listed abo If yes, List those being change: Champion for document change(s)? Target completion date	pill. List the documents ove require revision due to Actual comp	o this incident?	Circle Y		No Actual
as part of the follow up on this sp Do any of the document's listed about fyes, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action	ove require revision due to Actual components Countermeasus Preventive Acti	o this incident?	Circle Y	res or Target completion	No Actual
as part of the follow up on this space and of the document space about fyes, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action Cause (Use 5 Why/5M1K)	ove require revision due to Actual components Countermeasus Preventive Acti	o this incident?	Circle Y	res or Target completion	No
as part of the follow up on this space and of the document s listed about fyes, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action Cause (Use 5 Why/5M1K)	ove require revision due to Actual components Countermeasus Preventive Acti	o this incident?	Circle Y	res or Target completion	No Actual
as part of the follow up on this space and of the document space and of the document space and of yes, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action Cause (Use 5 Why/5M1K) Why	ove require revision due to Actual components Countermeasus Preventive Acti	o this incident?	Circle Y	res or Target completion	No Actual
Do any of the document s listed about fyes, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action Cause (Use 5 Why/5M1K) Why Why Why	ove require revision due to Actual components Countermeasus Preventive Acti	o this incident?	Circle Y	res or Target completion	No Actual
as part of the follow up on this set about the follow up on this set about the follow up on this set about the fives, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action Cause (Use 5 Why/5M1K) Why Why Why Why Why	ove require revision due to Actual comp Ons: Countermeasu Preventive Acti Prevent Reoccur	o this incident? Deletion date Ires/ ion to rence? Who	Circle Y	res or Target completion	No Actual
as part of the follow up on this spans part of the document s listed about fyes, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action Cause (Use 5 Why/5M1K) Why Why Why Why	ove require revision due to Actual comp Ons: Countermeasu Preventive Acti Prevent Reoccur	o this incident? Deletion date Ires/ ion to rence? Who	Circle Y	Target ompletion Date	No Actual
as part of the follow up on this say Do any of the document s listed abo If yes, List those being change: Champion for document change(s)? Target completion date Corrective/Preventive Action Cause (Use 5 Why/5M1K) Why Why Why Why Why Why Follow Up Verification (Must be En	ove require revision due to Actual comp Ons: Countermeasu Preventive Acti Prevent Reoccur	o this incident? oletion date ures/ ion to rence? Who	Circle Y	Target ompletion Date	Actual Compl. Da



Integrated Contingency Plan

No: GENEV-002
Date: 11/27/05
Process: Environmental
Page: 7 of 7

Revision			Approval		
Date	Rev.	Record	Initial	Manager	Coordinator
04/28/21	7	Removed Mike Mahoney and installed Wayne Mattox as 2 nd Emergency Alternate. Removed Chad Cotny and installed Gary Nagel at Valicor.	RB	BAL	Run Blatin
12/16/15	6	At 12.1.2.1 revised hyperlink to List of Lists. At Appendix A revise HazMat Spill Contractor information.	RB		
03/24/15	5	At 5. Replaced "or Steel" with General Manager and removed "affected by the incident, at 11.6 added General Managers, at Appendix A replaced "Aluminum Division" with "CMWA", replaced "Mike Lewis" with "Doug Jett", replaced "EA Manager" with "General Manager Steel Division", replaced "Sean Westmeier" with "Chad Conty", replaced "State Emergency Response Center" with "State Emergency Response Commission", replaced "800-255.2587" with "800/928-2380", replaced "502-607-1682" with "502/564-2380", replaced Spill Form with current form.	RB		
03/19/14	4	Revised to Work Instruction Format, updated contacts, updated links, and updated phone numbers.	RB		
11/14/13	3	Revised Primary Emergency Coordinator	RB		
7/19/13	2	Rev. 1.0 ref. to locations, & Update Appendix	MM		
11/20/12	1	Added Revision History	AC		