

THE GENERAL TIRE & RUBBER COMPANY
G.T.R. Chemical Company
Ashtabula, Ohio

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Unit: Environmental

Subject: SPILL PREVENTION CONTROL
AND COUNTERMEASURE PLAN (EPA)

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INTRODUCTION

The EPA developed and promulgated Oil Pollution Prevention Regulations (40 CFR, Part 112). This requires owners and operators of on-shore and off-shore non-transportation facilities to develop and implement Spill Prevention Control and Countermeasure (SPCC) plans to prevent the discharge of hazardous wastes into navigable waters of the United States or adjoining shore line.

The plan we adopted was as follows:

SPILL RECORD

This facility over the past 3 years has not had a reportable spill.

POTENTIAL SPILL SOURCES

The nearest navigable water is the Ashtabula River located approximately three miles from the plant site. Fields Brook, which runs through the property and where the effluent is discharged, flows into the Ashtabula River.

Possible oil spill sources are:

- (1) - 200,000-gallon storage tank
- (2) - 50,000-gallon storage tanks

Truck unloading area -- possible spill, 6,000 gallons.

Miscellaneous piping, valves, pumps, etc., used in transferring oil from truck to tank, tank to tank, or to the boilers.

The design, materials, and construction of each tank complies with API specifications.

All three tanks are diked and each dike contains a larger volume than the tank it contains. The truck unloading spill trench has a capacity of 7,000 gallons.

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OIL SPILL PREVENTION AND CONTROL PROCEDURES

Drainage

Drainage from the dike and truck unloading areas is controlled by separate manual open-close double gate valves. These valves are kept closed at all times except when draining rain water.

When draining rain water, the following procedure is to be observed:

1. The drain valves are to be opened only under the supervision of the boilerhouse foreman, the shift foreman, or the area engineer.
2. The rain water will be inspected and tested before draining into the process sewers to assure that it meets water quality standards.
3. After the water has been drained the valves must be closed.
4. The supervisor is to keep a record of each such event. This record will be kept in the boilerhouse foreman's office.

Heating Coils

Heating coil leakage is controlled by monitoring the steam return. If a leak does occur, the contaminated steam is discharged inside the dike area of the tank for containment until repairs can be initiated.

Level Indicators

Oil levels in the storage tanks are determined by direct reading level indicators located on the side of the tanks. Close monitoring is maintained when unloading a truck or transferring oil from tank to tank.

Facility Inspections

Each tank and its dike area is visually inspected monthly. All unloading and transfer piping, valves, pumps, etc., are checked monthly. Records are kept of these inspections and can be found in the boilerhouse foreman's office.

Process Sewer System

The storage tank dike areas and the truck unloading spill trench drain to a process sewer and cannot be bypassed to the storm sewer system. The process sewer drains directly to the central waste treatment system where the water is chemically treated before discharge to a series of three settling lagoons. If an oil spill does occur, the system can be put on recycle at the chemical mixing pit until one of the three lagoons

is isolated from the other two. The spill can then be pumped to this lagoon until it can be properly disposed of by mechanical means.

The facilities and procedures are designed to make the system foolproof. It would take a combination of errors and/or equipment failure for an oil or hazardous waste spill to get into the process system.

POTENTIAL HAZARDOUS WASTE SPILL SOURCES

Possible hazardous waste spill sources are:

- (1) - 6,000-gallon Trichloroethylene storage tank
- (1) - 6,000-gallon Vinyl Acetate storage tank
- (1) - 5,000-gallon Sodium Hydroxide storage tank
- (1) - 4,100-gallon Sulfuric Acid storage tank

Miscellaneous piping, valves, pumps, etc., used in transferring hazardous wastes from storage to the water treatment building or polymer building.

All four tanks are diked and each dike contains a larger volume than the tank it contains.

HAZARDOUS WASTE SPILL PREVENTION AND CONTROL PROCEDURES

Drainage

Drainage from the diked areas is controlled by manual open/close gate valves. These valves are kept closed at all times except when draining rain water.

When draining rain water, the following procedure is to be observed:

1. The drain valves are to be opened only under the supervision of the boilerhouse foreman, the shift foreman, or the area engineer.
2. The rain water will be inspected and tested before draining into the process sewers to assure that it meets water quality standards.
3. After the water has been drained, the valves must be closed.
4. The supervisor is to keep a record of each such event. This record will be kept in the boilerhouse foreman's office.

Facility Inspections

Each tank and its dike area is visually inspected monthly. All transfer piping, valves, pumps, etc., are checked monthly. Records are kept of these inspections and can be found in the boilerhouse foreman's office.

Process Sewer System

The storage tank dike areas drain to a process sewer and cannot be bypassed to the storm sewer system. The process sewer drains directly to the central waste treatment system where the water is chemically treated before discharging to a series of three settling lagoons.

SPILL CONTAINMENT AND CONTROL PROCEDURES

If an oil or hazardous waste spill does occur, it will be contained in the diked areas or the truck unloading trench. The foremen and area engineer are to be notified immediately. The cause of the spill will be determined and resolved as soon as possible. If contamination is minimal, the spill will be pumped back to storage. Otherwise, the spill will be disposed of by federally approved methods. After the spill has been pumped back to storage or disposed of, the dike area or trench is to be thoroughly cleaned.

If a spill of Trichloroethylene, Vinyl Acetate, Sodium Hydroxide, or Sulfuric Acid in excess of 1,000 pounds does occur and it is not contained and goes to Fields Brook, then it must be reported to the Ohio EPA, Federal EPA, and the United States Coast Guard.

If an oil spill is not contained and goes to Fields Brook, it must be reported to the Ohio EPA, phone (614) 299-6336, the Federal EPA, phone (216) 333-7556, and the United States Coast Guard, phone (216) 964-9417.

Adherence to these procedures will assure us the highest degree of certainty in the containment and control of any spill should one occur.

EVACUATION

In the event an evacuation is announced, the procedure in Section I, Vinyl Chloride Spill Procedure (S-1) should be followed.