Spill Prevention, Control & Countermeasure Plan

Nanogate North America LLC

October 2022

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Appendices

LIST OF ACRONYMS AND ABBREVIATIONS

AST	Aboveground Storage Tank
EPA	U.S. Environmental Protection Agency
NPDES	National Pollutant Discharge Elimination System
PE	Professional Engineer
POTW	Publicly Owned Treatment Works
SPCC	Spill Prevention, Control, and Countermeasure
UST	Underground Storage Tank

INTRODUCTION

Purpose

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

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

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

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

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

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in Appendix C.

- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.

- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log included in Appendix E.

- If either of the following occurs, submit the SPCC Plan to the EPA Region 5 Regional Administrator (RA) and Ohio EPA, along with other information as detailed in Section 5.4 of this Plan:

    - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or

    - The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.

    - Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the

time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.

- Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a Professional Engineer (PE).

- Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.

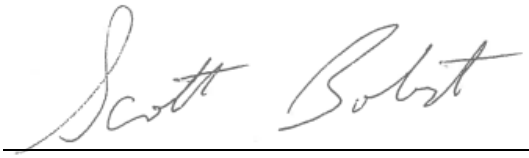
Part 1: Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

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

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

Authorized Facility Representative

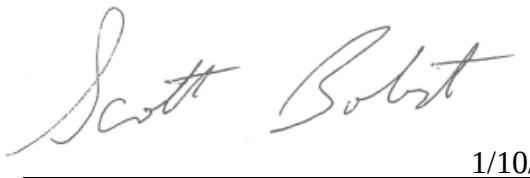
Scott Bobst, PE	Environmental Health Manager
Name	Title
	2/26/2022
Signature	Date

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

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

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

Scott A Bobst, PE / Ohio-63509
Name / License#



1/10/2022
Signature / Date

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

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the facility. This plan is maintained by the Environmental Health Manager and must be immediately available to the U.S. EPA, Ohio EPA, and the city of Mansfield upon request.

1.4 Plan Review (40 CFR 112.3 and 112.5)

1.4.1 Changes in Facility Configuration

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

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

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

- change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- change in the name or contact information of spill response or cleanup contractors.

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

1.4.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), the Environmental Health Manager reviews this SPCC Plan at least once every five years. Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d).

1.4.3 Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in the Plan Review Log (Table 1-1). This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur within 5 years of the last review entered in the Plan Review Log.

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

This section is not applicable.

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

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

Table 1-1: Plan Review Log

By	Date	Activity	PE certification required?	Comments
Michael Kennard	9/1/2015	Plan Rewritten	Yes	New SPCC Plan.
Scott Bobst	8/25/2016	Added JTR tank, name changes	Yes	
Scott Bobst	6/2/2017	Removed JTR Tank, minor editorial changes	Yes	
Scott Bobst	6/4/2018	Added mobile tank	Yes	
Scott Bobst	8/7/2019	Name Change	No	
Scott Bobst	1/10/2022	Added mineral oil tank	Yes	
Scott Bobst	10/26/2022	Updated spill contractor	No	

Table 1-2: SPCC Cross-Reference

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112.8(d)	4.3 Transfer Operations, Pumping and In-Plant Processes	16
112.20(e)	Certification of Substantial Harm Determination	Appendix B

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

Part 2: General Facility Information

Name:	Nanogate North America LLC
Address:	150 East Longview Avenue Mansfield, Ohio 44906
Description:	The facility molds and spray paints injection molded plastics components for the automotive industry using robotic spray equipment.
Operator:	Nanogate North America LLC 150 East Longview Avenue Mansfield, OH 44903
Primary contact:	Scott Bobst, PE, Environmental Health Manager (419) 521-0366

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

2.1.1 Location and Activities

Nanogate North America LLC is located at 150 East Longview, in Mansfield Ohio at Longitude 82º30'30", Latitude 40º46'30". The business phone number is (419) 524-3778.

The primary SIC for the facility is 3089 – plastic products, nec (NAICS 326199 –all other plastics product manufacturing).

The facility operates 24 hours, 6 days per week. Office hours are between 7:00 AM and 5:00 PM, Monday through Friday.

The Site Plan and Facility Diagram included in Appendix A of this Plan show the location and layout of the facility. The Facility Diagram (Figure A-2) shows the location of oil containers, buildings, loading/unloading and transfer areas, and critical spill control structures.

2.1.2 Oil Storage

Oil is stored at the facility in drums and totes, and oil can also be found in manufacturing equipment. Counting containers and equipment with a capacity of 55 gallons or greater, the total oil stored at the facility is greater than 1,320 gallons, mostly in transformers and molding machine hydraulics.

The capacities of oil containers present at the site are listed below and are also indicated on the facility diagram in Figure A-2. All containers with capacity of 55 gallons or more are included.

There is no PCB oil on site.

Table 2-1: Oil Containers

ID	Content	Description
Fixed Storage		
5,000-gallon Tank	Mineral Oil	5,000-gallon double-walled mineral oil tank
Portable storage		
500-gallon mobile tank used by contractors (temporary)	Diesel	500-gallon mobile tank in secondary containment
55-gallon steel drums	Oil (Various)	Approx 1,500 gallons in Drum Storage for equipment. Multiple locations throughout facility (building containment).
275-gallon plastic totes	Oil (Various)	Approx. 3,000 gallons in Tote Storage for use oil. Multiple locations throughout facility (building containment).
Oil Containing Machinery (55 gallon capacity and greater)		
Molding machines	Hydraulic Oil	Approx. 3,000 gallons Hydraulic oil in molding machines (building containment)
Transformers	Transformer Oil	7,266 gallons in Transformers (Leak would be contained in on-site containment pond): Northeast corner - three 60 gal. transformers = 180 gal. Northeast wall – three 100 gal. transformers = 300 gal. Southeast corner- One 50 gal. transformer = 50 gal. - three 75 gal. transformers = 225 gal. - Three 100 gal. transformers = 300 gal. - Three 200 gal. transformers = 600 gal. Southwest corner- One 465 gal. transformer = 465 gal. Southeast wall – One 50 gal. transformer = 50 gal. - Three 56 gal. transformers =168 gal. - Three 100 gal. transformers = 300 gal. - Three 120 gal. transformers = 360 gal. - Three 126 gal. transformers = 378 gal. - One 498 gal. transformer = 498 gal. Westside of building - One transformer = 3061 gal. East side of fab shop – One transformer = 331 gal.

Total Oil Storage: >20,000 gallons

2.2 Evaluation of Discharge Potential

2.2.1 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

The facility is located on relatively level terrain. Drainage is routed by catch basins with the outfall to a retention pond that discharges to a wetlands area to the west.

Discharge from the south side of the facility (JTR) is primarily to the south and southwest to a wetlands area and to the Rocky Fork River

2.2.2 Discharge History

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

Table 2-2: Oil Discharge History

Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence
There have been no reportable discharge events at Nanogate North America LLC		

PART 3: Discharge Prevention - General SPCC Provisions

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

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

This facility is in compliance with all applicable requirements. Any deviations allowed under this section are discussed in the applicable section of this plan.

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

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

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

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

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

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

Table 3-1: Potential Discharge Volumes and Direction of Flow

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Fixed Storage:				
Tank overflow	10-500	Gradual to instantaneous	Back area. Not likely to escape property.	Double wall tank
Portable Storage (drums and totes / Portable Tank)				
Complete container failure	55/300	Gradual to instantaneous	Building	Building
Complete container failure	500	Gradual to instantaneous	Nearest catch basin	Containment Dike
Oil Containing Machinery				
Complete failure	100-275	Gradual to instantaneous	Building	Building

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

Methods of secondary containment at this facility include a combination of structures (e.g., dike, berm, built-in secondary containment), drainage systems (catch basins), and land-based spill response (e.g., drain covers, sorbents) to prevent oil from reaching navigable waters and adjoining shorelines:

< For bulk storage containers (refer to Section 4.2.2 of this Plan):

  < **Containment.** Drums and totes are stored inside the building.

  < **Spill control equipment.** Absorbent materials and spill response equipment are strategically located throughout the facility to respond to a spill.

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

Secondary containment is practicable and employed at this facility.

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

As required by the SPCC rule, the facility performs the inspections, tests, and evaluations listed in the following table. Table 3-2 summarizes the various types of inspections and tests performed at the facility. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the facility (e.g., Section 4.2.6 for bulk storage containers).

Table 3-2: Inspection and Testing Program

Facility Component	Action	Frequency
Tank/Drums/Totes	Visually check tank for signs of spills/leaks	Monthly
Lowermost drain and all outlets of tank truck	Visually inspect lowermost drain and all outlets of tank trucks.	Prior to filling and departure
Periodic integrity testing is not required. Other than drums and totes, the facility has one double-walled steel tank. Equivalent environmental protection to integrity testing is provided by the tank being elevated allowing for ready detection of a leak and the tank being inside the building.		

3.7.1 Routine Inspection

Employees conduct visual inspections of vessels during routine walkthroughs of the facility. These visual inspections involve looking for container damage or leakage, and stained or discolored areas that are to be reported to the Environmental Health Manager immediately.

3.7.2 Monthly Inspection

The checklist provided in Appendix C is used for monthly inspections by personnel. The monthly inspections cover the following key elements:

- Observing the exterior of tanks and portable containers for signs of deterioration or leaks.

All problems regarding containers or containment, or response equipment must immediately be reported to maintenance or the area supervisor. Visible oil leaks must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written monthly inspection records are signed by the Environmental Health Manager and maintained with this SPCC Plan for a period of three years.

3.7.3 Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and is performed each year using the checklist provided in Appendix C of this Plan.

Written annual inspection records are signed by the Environmental Health Manager and maintained with this SPCC Plan for a period of three years.

3.7.4 Periodic Integrity Testing

Periodic integrity testing is not required.

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

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

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

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

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

3.9 Security (40 CFR 112.7(g))

Oil storage is primarily inside and only accessible to authorized personnel. For outside storage, there are no flow valves or drain valves or starter controls that could be used to initiate a discharge. Lighting is adequate to discourage vandalism and assist in the discovery of oil discharges.

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

This section is not applicable.

3.10.1 Secondary Containment (40 CFR 112.7(h)(1))

There are no containers stored outside. The building provides adequate secondary containment for containers stored inside.

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

This section is not applicable.

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

This section is not applicable.

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

There are no additional state or local applicable requirements identified.

PART 4: Discharge Prevention – SPCC Provisions for Onshore Facilities (Excluding Production Facilities)

4.1 Facility Drainage (40 CFR 112.8(b))

Any discharge from a tank, drum, tote, machine reservoir, or any other source on the facility would flow through catch basins to the onsite retention pond where the spill would be contained at the facility.

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

There is one small vertical steel tank used for collecting used oil that is to be sent for recycling. The tank is elevated on steel skids for the easy discovery of a spill or leak, and the tank is equipped with a level indicator.

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

The materials of construction of all containers are compatible with the material stored.

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

The used oil tank is in a secondary containment tray inside the building.

4.2.3 Drainage of Diked Areas (40 CFR 112.8(c)(3))

There are no diked areas that must be drained

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

This section is not applicable.

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

This section is not applicable.

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

Visual inspections of ASTs by facility personnel are performed according to the procedure described in this SPCC Plan. Leaks from tank seams, gaskets, rivets, and bolts are promptly corrected. Records of inspections and tests are signed by the inspector and kept at the facility for at least three years.

Table 4-2 summarizes inspections and tests performed on bulk storage.

Table 4-2: Scope and Frequency of Bulk Storage Containers Inspections and Tests

Inspection/Test	Tanks	ID Drums	Totes
Visual inspection by facility personnel (as per checklist of Appendix C)	Monthly Annually	Monthly Annually	Monthly Annually
External inspection by certified inspector	n/a	n/a	n/a
Internal inspection by certified inspector	n/a	n/a	n/a
Tank tightness test meeting requirements of 40 CFR 280	n/a	n/a	n/a

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

This section is not applicable.

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

Drums, totes, and the steel tank are checked visually or by sticking prior to any loading.

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

This section does not apply.

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

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

Oil is promptly removed and disposed or recycled according to the waste disposal method described in Part 5 of this Plan.

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

Small portable oil storage containers, such as 55-gallon drums, are stored inside the building which provides adequate secondary containment. Containers are stored away from drains or areas that are sloped away from the building.

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

Transfer operations at this facility include:

* The transfer of oil from drums/totes into facility machinery.

Table 4-3: Oil Transfer Procedures

Stage	Tasks
Prior to loading/ unloading	• Visually check all hoses for leaks and wet spots. • Verify that sufficient volume (ullage) is available in the storage tank or truck. • Lock in the closed position all drainage valves of the secondary containment structure. • Secure the tank vehicle with wheel chocks and interlocks. • Ensure that the vehicle's parking brakes are set. • Verify proper alignment of valves and proper functioning of the pumping system. • If filling a tank truck, inspect the lowermost drain and all outlets. • Establish adequate bonding/grounding prior to connecting to the fuel transfer point. • Turn off cell phone.
During loading/ unloading	• Driver must stay with the vehicle at all times during loading/unloading activities. • Periodically inspect all systems, hoses and connections. • When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. • When making a connection, shut off the vehicle engine. When transferring Class 3 materials, shut off the vehicle engine unless it is used to operate a pump. • Maintain communication with the pumping and receiving stations. • Monitor the liquid level in the receiving tank to prevent overflow. • Monitor flow meters to determine rate of flow. • When topping off the tank, reduce flow rate to prevent overflow.
After loading/ unloading	• Make sure the transfer operation is completed. • Close all tank and loading valves before disconnecting. • Securely close all vehicle internal, external, and dome cover valves before disconnecting. • Secure all hatches. • Disconnect grounding/bonding wires. • Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan. • Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage. • Remove wheel chocks and interlocks. • Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

Part 5: Discharge Response

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

In general, the following steps are taken:

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

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

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

5.1 Response to a Minor Discharge

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

- The quantity of product discharged is small (e.g., may involve less than 10 gallons of oil);
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

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

- Immediately notify the Environmental Health Manager.
- Under the direction of the Environmental Health Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Environmental Health Manager will complete the discharge notification form (Appendix I) and attach a copy to this SPCC Plan.

5.2 Response to a Major Discharge

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

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

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

- All workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas at a safe distance from the discharge. Exit routes are included on the facility diagram and posted in the maintenance building, in the office building, and on the outside wall of the outside shed that contains the spill response equipment.
- If the Environmental Health Manager is not present at the facility, the senior on-site person notifies the Environmental Health Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge. For example, if oil reaches a sanitary sewer, the publicly owned treatment works (POTW) should be notified immediately.
- The Environmental Health Manager (or senior on-site person) must call for medical assistance if workers are injured.
- The Environmental Health Manager (or senior on-site person) must notify the Fire Department or Police Department.
- The Environmental Health Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in Appendix H.
- The Environmental Health Manager (or senior on-site person) must immediately contact Ohio EPA Emergency Response (800) 282-9378 and the National Response Center (800) 424-8802.
- The Environmental Health Manager (or senior on-site person) must record the call on the Discharge Notification form in Appendix I and attach a copy to this SPCC Plan.
- The Environmental Health Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

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

5.3 Waste Disposal

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

Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor.

5.4 Discharge Notification

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

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

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

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix H.

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix H) whenever the facility discharges (as defined in 40 CFR 112.1(b)) *more than 1,000 gallons of oil in a single event,* or discharges (as defined in 40 CFR 112.1(b)) *more than 42 gallons of oil in each of two discharge incidents within a 12-month period.* The following information must be submitted to the EPA Regional Administrator and to Ohio EPA Emergency Response within 30 days:

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

- Other pertinent information requested by the Regional Administrator.

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

5.5 Cleanup Contractors and Equipment Suppliers

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

Spill kits are located at various locations throughout the facility. The inventory of response supplies and equipment is provided in Appendix J of this Plan. The inventory is verified on a monthly basis.

Appendix A
Site Plan and Facility Diagram

Figure A-1: Site Plan.

Figure A-2: Facility Diagram.

Appendix B
Substantial Harm Determination

Facility Name: Nanogate North America LLC
Facility Address: 150 East Longview Avenue
Mansfield, OH 44906

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes ○ No ●

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?
Yes ○ No ●

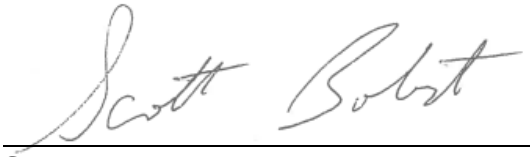
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes ○ No ●

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
Yes ○ No ●

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes ○ No ●

Certification

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

Scott Bobst, PE	Environmental Health Manager
Name	Title
	8/25/2016
Signature	Date

APPENDIX C
Facility Inspection Checklists

The following checklists are to be used for monthly and annual facility-conducted inspections. Completed checklists must be signed by the inspector and maintained at the facility, with this SPCC Plan, for at least three years.

Monthly Inspection Checklist

This inspection record must be completed *each month* except the month in which an annual inspection is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks/drums/totes			
Tank surfaces show signs of leakage			
Tanks are damaged, rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Secondary containment is damaged or stained			
Piping			
Valve seals, gaskets, or other appurtenances are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Security			
Fencing, gates, or lighting is non-functional			
Response Equipment			
Response equipment inventory is complete			

Date: _____ **Signature:** _____

Annual Facility Inspection Checklist

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

	Y*	N	Description & Comments
Storage tanks			
Tank surfaces show signs of leakage			
Tank is damaged, rusted or deteriorated			
Bolts, rivets or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Secondary Containment			
Secondary containment is stained or contains oil			
Dike show signs of wear / corrosion			
Piping			
Valve seals or gaskets are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Out-of-service pipes are not capped			
Warning signs are missing or damaged			
Security			
Fencing, gates, or lighting is non-functional			
Pumps and valves are not locked (and not in use)			
Response equipment			
Response equipment inventory is incomplete			

Annual reminders:

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

Additional Remarks:

Date: _____ Signature: _____

APPENDIX D
Record of Containment Dike Drainage

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

Date	Diked Area	Presence of	Time	Time	Signature

APPENDIX E
Record of Annual Discharge Prevention Briefings and Training

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

Date	Subjects Covered	Employees in Attendance	Instructor(s)
HR maintains records in PLEX			

APPENDIX F
Calculation of Secondary Containment Capacity

N/A

APPENDIX G
Records of Tank Integrity and Pressure Tests

There are currently no tanks requiring integrity or pressure testing.

APPENDIX H
Emergency Contacts

Designated person responsible for spill prevention: ***Scott Bobst, PE, Environmental Health Manager***
(419) 521-0366

EMERGENCY TELEPHONE NUMBERS:

Facility

Scott Bobst, Environmental Health Manager	(419) 632-4400 (24 hr)

Local Emergency Response

Mansfield Fire Department	911 or (419) 524-2424
Avita Hospital	(567) 307-7665
Mansfield Water Treatment Plant	(419) 589-2830

Response/Cleanup Contractors

EnviroServe	(800) 488-0910

Notification

National Response Center	(800) 424-8802
Ohio EPA Emergency Response	(800) 282-9378
Richland County LEPC	(419) 774-5686

APPENDIX I
Discharge Notification Form

Part A: Discharge Information	
General information when reporting a spill to outside authorities: Name: Nanogate North America LLC Address: 150 East Longview Ave Mansfield, OH 44903 Telephone: (419) 747-4161 Operator: Nanogate North America LLC 150 East Longview Mansfield, OH 44903 Primary Contact: Scott Bobst, PE, Environmental Health Manager (419) 632-4400	
Type of oil:	Discharge Date and Time:
Quantity released:	Discovery Date and Time:
Quantity released to a waterbody:	Discharge Duration:
Location/Source:	
Actions taken to stop, remove, and mitigate impacts of the discharge:	
Affected media: G air G water G soil	G storm water sewer/POTW G dike/berm/oil-water separator G other: _____
Notification person:	Telephone contact: Business: 24-hr:
Nature of discharges, environmental/health effects, and damages: Injuries, fatalities or evacuation required?	

Part B: Notification Checklist		
	Date and time	Name of person receiving call
Discharge in any amount		
Scott Bobst, PE, Environmental Health Manager (419) 632-4400		
Discharge in amount exceeding 25 gallons and *not affecting a waterbody or groundwater*		
Local Fire Department (419) 524-2424 or 911		
Ohio EPA Emergency Response (800) 282-9378		

Discharge in any amount and affecting (or threatening to affect) a water body		
Local Fire Department (419) 524-2424 or 911		
Ohio EPA Emergency Response (800) 282-9378		
National Response Center (800) 424-8802		
City of Mansfield POTW* (419) 589-2830		
CCI Midwest Industrial Services (Spill Cleanup) (419) 982-2006		

* The POTW should be notified of a discharge only if oil has reached or threatens sewer drains that connect to the POTW collection system.

APPENDIX J
Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed.

Small spill kit contents:

2 absorbent socks
4 absorbent mats
1 drum repair putty
1 dust mask
1 pair of gloves
1 pair of safety glasses
1 trash bag

Large spill kit contents:

2 Large oil booms
4 small oil booms
2 drum repair putty
6 pig mats
1 40 lb bag of oil dry
2 pair of goggles
2 pairs of rubber gloves
2 dust mask
2 chemical resistant suits
2 large trash bags
2 latex over boots

(See Emergency Action and Contingency Plan for map of emergency response equipment map)

APPENDIX K
Agency Notification Standard Report

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

Facility:	*Nanogate North America LLC*
Name of person filing report:	
Location:	
Maximum storage capacity:	
Daily throughput:	
Nature of qualifying incident(s): ☐Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons ☐Second discharge exceeding 42 gallons within a 12-month period.	

Description of facility (attach maps, flow diagrams, and topographical maps):

Nanogate North America LLC is located at 150 East Longview, in Mansfield Ohio at Longitude 82º30'30", Latitude 40º46'30". The business phone number is (419) 524-3778.

The facility molds and spray paints injection molded plastics components for the automotive industry using robotic spray equipment.

Agency Notification Standard Report (cont'd)
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:
Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:
Additional preventive measures taken or contemplated to minimize possibility of recurrence:
Other pertinent information: