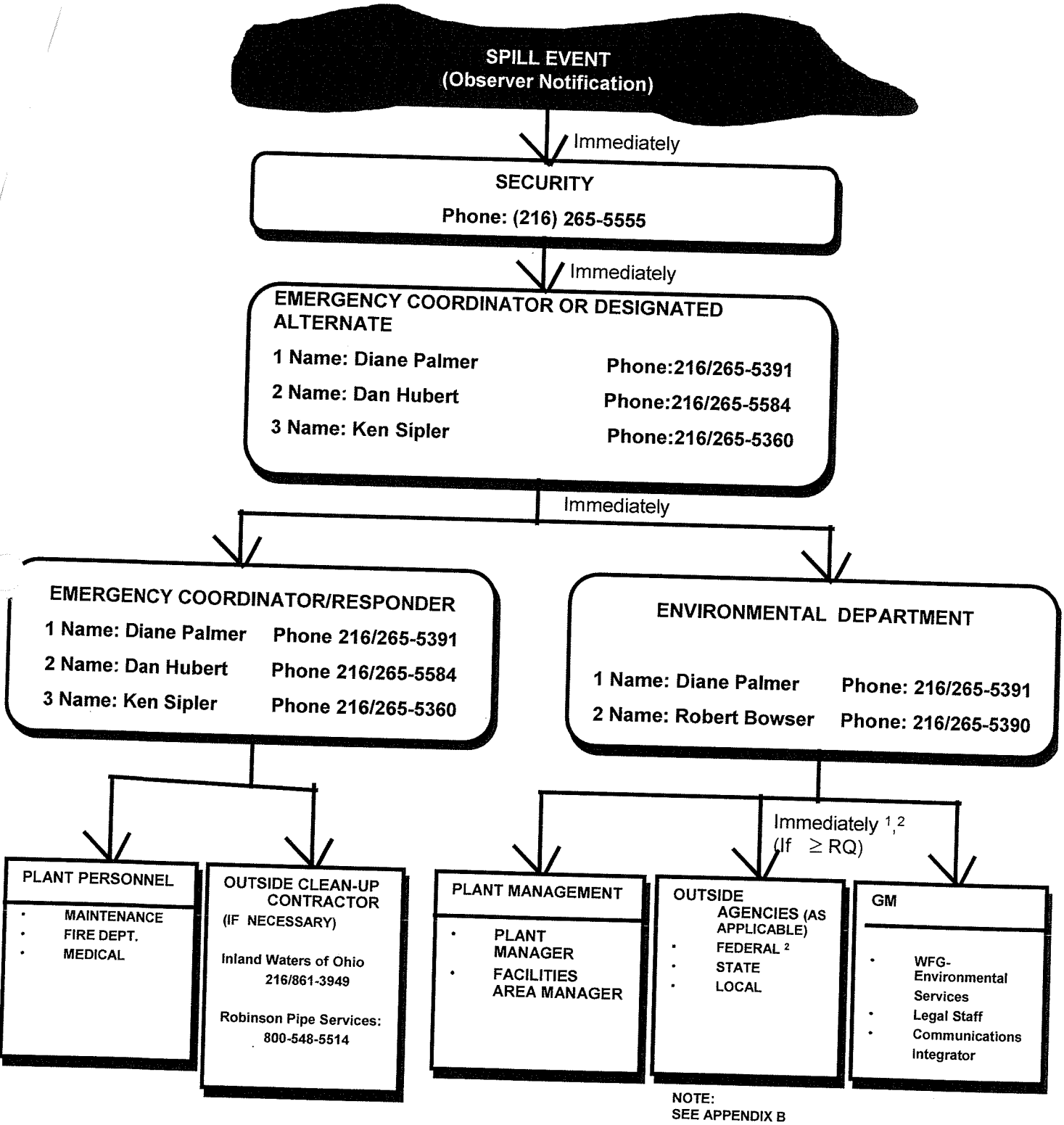
INTERNAL NOTIFICATION FLOWCHART



1. "Immediately" means as soon as possible but no later than 15 minutes of knowledge of spill.

2. Immediately call the National Response Center (1.800.424-8802) if potentially an RQ has been released to the environment. If the spilled material is oil or an oil mixture and reaches a navigable waterway causing discoloration or the formation of a sheen then the release must be reported **immediately** [Clean Water Act] to federal, state, and local officials.

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

General Motors Corporation
Parma Complex
5400 Chevrolet Boulevard
Parma, Ohio 44130

Prepared by:
Haley & Aldrich, Inc.
5755 Granger Road
Cleveland, OH 44131

July 2007
Project Number: 28777-500

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1.0 GENERAL REQUIREMENTS

1.1 Professional Engineer Certification [40 CFR 112.3(d)]

EPA Regulations for SPCC Plans, found at 40 CFR 112.3 through 112.7, require that the plan be prepared in accordance with good engineering practices and that a registered Professional Engineer, familiar with regulations, examine the facility, and review and certify the SPCC Plan. The certification is provided below.

Based on the site visit performed as part of the preparation of this plan, items that could hinder the implementation of the requirements of this plan may have been identified. These items will require addressing by the plant in order to meet good engineering practices. A list of these items has been included as Table A-1 in Appendix A of this document. The plant will have six (6) months to satisfactorily address the items identified in Table A-1 of Appendix A of this document, or certification of this plan will become void.

As a Registered Professional Engineer, I hereby certify that I, or my agent have visited and examined the GM Parma Complex Facility, and being familiar with the provisions of 40 CFR Part 112, attest that this Spill Prevention, Control, and Countermeasures Plan has been prepared in accordance with good engineering practices.

_____

Name of Registered Professional Engineer:

_____

Affiliation:

_____

Signature of Registered Professional Engineer:

_____

Date: (SEAL)

_____

Ohio Registration Number:

1.2 Management Commitment

1.2.1 SPCC Commitment [40 CFR 112.3(e)]

It is the intent of the GM Parma Complex to implement the procedures outlined in this SPCC Plan and to take the necessary steps to minimize the potential for releases to navigable waters of the United States. A copy of this plan shall be maintained at the facility at all times and will be made available to the Regional Administrator for on-site review during normal working hours.

BRUCE A. PIERSON
Name of Management Person

PLANT MANAGER
Title

Bruce A Pierson
Signature

AUGUST 2, 2007
Date

1.2 Management Commitment

1.2.1 SPCC Commitment [40 CFR 112.3(e)]

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_____

Name of Management Person

_____

Title

_____

Signature

_____

Date

1.3 Substantial Harm Criteria Certification [40 CFR 112.20]

Facility Name: General Motors Parma Complex
5400 Chevrolet Boulevard
Parma, Ohio 44130

If the answer to one or more of the following questions is yes, the facility is required to implement a Facility Response Plan (FRP) under the requirements of 40 CFR 112.20. If all answers are no, an FRP is not required and this form should be signed and inserted into Appendix A, Table A-9. Every five years, the Certification of Substantial Harm should be re-certified as part of the triennial inspection to indicate no change in the status of the site regarding 40 CFR 112.20.

Does the facility transfer oil over water to or from vessels (ships) and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation within any above ground oil storage tank area?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one 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 five years?

YES _____ NO _____

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.

_____ _____
Print Name Title

_____ _____
Signature Date

1.4 Regional Administrator - Plan Amendments [40 CFR 112.4]

1.4.1 Reporting Significant Releases or Spills [40 CFR 112.4(a)]

Not withstanding compliance with Section 112.3, whenever the facility has a discharge of oil in excess of 1,000 gallons in a single event, or two discharges occur of more than 42 gallons within any 12-month period, the following information must be submitted to the Regional Administrator of the EPA within 60 days from the time of the incident:

- Name of the facility;
- Your name;
- Location and phone number of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of the facility, including maps, flow diagrams, and topographical maps as necessary;
- The cause of the discharge, including failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Such other information as the Regional Administrator may reasonably require pertinent to the SPCC plan or the discharge.

This information should be submitted to the following address:

Region V USEPA
Attention Regional Administrator – Oil Programs
77 West Jackson Street
Chicago, Illinois 60604

1.4.2 Notification of State Agency [40 CFR 112.4(c)]

Send to the state agency in charge of oil pollution control activities, a complete copy of all information provided to the Regional Administrator in the subsection above. The state agency may conduct a review of and make recommendations of the Regional Administrator as to further procedures, methods, equipment, and other requirements necessary to prevent and contain discharges from the facility. Notification should be provided to the following addresses:

Ohio Environmental Protection Agency
State Emergency Response Center
Division of Emergency and Remedial Response
1800 Watermark Drive
P.O. Box 1049
Columbus, Ohio 43216-1049
(800) 282-9378

1.4.3 Amendment Requirements [40 CFR 112.4(d)]

The Regional Administrator may require amendment of the Plan if he finds that is does not meet the requirements of this part or that amendment is necessary to prevent and contain discharges from the facility.

1.4.4 Amendment Notifications [40 CFR 112.4(e)]

The Regional Administrator may propose by certified mail or personal delivery that the Plan must be amended. The Regional Administrator is required to notify the registered agent of the corporation in the state in which the facility is located. Terms of such a proposed amendment will be noted by the Regional Administrator. The facility must submit written information, views, and arguments on the proposed amendment within 30 days of receipt. The Regional Administrator must then respond with notification of required amendment or rescind the notice. The facility must amend the plan within 30 days of such notice, unless the Regional Administrator has specified another effective date. The amended plan must be implemented as soon as possible but no later than six months after the amendment, unless the Regional Administrator specifies another date.

1.4.5 Appeal of Decisions [40 CFR 112.4(f)]

An appeal of the Regional Administrator's decision must be submitted to the EPA Administrator in writing within 30 days of receipt of the notice. The appeal must contain a clear and concise statement of the issues and points of fact in the case. The EPA Administrator may request additional information. The EPA Administrator must render a decision within 60 days of receiving the appeal and must notify the facility of his decision.

1.5 Plan Amendment - Owner or Operator [40 CFR 112.5]

1.5.1 Plan Amendment [40 CFR 112.5(a)]

This SPCC plan shall be amended whenever there is a change in facility design, construction, operation, or maintenance practices which materially affects the facility's potential for the discharge of oil upon the navigable waters of the United States or adjoining shore lines. Such amendments shall be fully implemented as soon as possible, but not later than six months after such changes occur.

Examples of changes that may require amendment of the Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility.

Any such changes shall be noted on the Review and Amendment Log included as Table A-2 in Appendix A of this Plan. An SPCC Checklist is also contained in Appendix A. Any pages that require revision will be noted with the date of the change and will replace the existing page in this plan. An entry will be made in the Review and Amendment Log noting the date of the change, a general description of the changes that made the amendment necessary (an additional description of changes can be inserted as an attachment to the log, if necessary), pages affected, signature of the person making the changes, and noting whether the changes were significant enough to warrant re-certification by a Professional Engineer.

1.5.2 Plan Review [40 CFR 112.5(b)]

The SPCC plan shall be reviewed and evaluated at least once every three years. An entry shall be made in the Review and Amendment Log (Table A-2) and signed after each review. If the plan is determined to be satisfactory through this review, then the entry shall note that no changes were made and will include the signature of the reviewer. Any changes to the plan made as a result of the scheduled review shall be made as soon as possible, but no more than six months from the time of the review. Amendment procedures shall follow those described in the preceding subsection.

1.5.3 Re-Certification [40 CFR 112.5(c)]

Significant amendments to the plan will require re-certification by a professional engineer in accordance with 112.3(d). If re-certification is required, a new certification page shall be sealed and signed and inserted into the plan. Administrative changes, such as name changes of response team personnel or the Environmental Engineer (EE) do not require re-certification, but still must be noted in the Review and Amendment Log (Table A-2).

2.0 SPCC PLAN - GENERAL REQUIREMENTS [40 CFR 112.7]

The following sections contain the SPCC plan for the General Motors Parma Complex, located at 5400 Chevrolet Boulevard in Parma, Ohio. The plan has been prepared in accordance with good engineering practices, and has the full approval of management agreement at a level with authority to commit the necessary resources. The sequence of the plan follows that of the requirements set forth in 40 CFR Part 112.7.

The Plan describes:

- Site Description and History
- Spill History and Reporting Requirements
- Description of Storage Units
- Description of Containment Structures
- Site Drainage
- Bulk Storage
- Transfer Operations
- Loading/Unloading Procedures
- Inspections
- Facility Security Measures
- Personnel Training

Information presented in this plan was derived from on-site review, site inspection, and interviews with facility personnel. A copy of the plan will be maintained at the facility at all times. The plan has been reviewed, certified, and signed by a Registered Professional Engineer (see certification page in Section 1.1).

As provided by 40 CFR 112.1, a SPCC plan is required for all non-transportation-related facilities:

- that have the capacity to store petroleum materials in excess of 1,320 gallons above ground, or,
- the facility's underground storage capacity of petroleum materials is greater than 42,000 gallons, excluding from calculations the capacity covered by 40 CFR 280 or 281 (UST regulations).

If a facility meets any one of the above criteria, it is subject to SPCC regulations if, due to its location, the facility could reasonably be expected to discharge oil, either directly or indirectly, into or upon the navigable waters of the United States.

Navigable waters are described in 40 CFR 112 as the "waters of the United States." The regulations list the many kinds of waters covered under this term, including any type of surface water body which could be used for interstate or international commerce, and all tributaries of these waters. Tributaries have been determined to include intermittent streams, drainage ditches, and storm sewer systems which eventually feed a river, lake, or wetland, which could be adversely affected by a release of chemicals and petroleum.

Because the above ground oil storage capacity for the GM Parma Complex exceeds 1,320 gallons and because a discharge of oil could either directly or indirectly reach the navigable waters of the United States, an SPCC plan is required for the Parma Complex.

2.1 General Facility Description [40 CFR 112.7(a)(3)]

The GM Parma Complex is located at 5400 Chevrolet Boulevard in Parma, Cuyahoga County, Ohio. The site is bounded by Brookpark Road to the north, Chevrolet Boulevard to the east, Snow Road to the south, and railroad tracks to the west. The site contains: manufacturing plants, powerhouse building, scrap baler building, fire pump buildings, primary electrical substation, waste treatment plant (WTP), die storage, railroad service, employee parking, and unpaved areas. Refer to Figure E-1 (SPCC Facility Drawing).

The hours of operation are 24-hours, seven days per week. The shifts are as follows with some variations in start time. First shirt operations are from 6:30 AM to 2:30 PM. Second shift is from 2:30 PM to 10:30 PM. Third shift is from 10:30 PM to 6:30 AM. Total employment is approximately 2,200 union and non-union employees.

Plant access is restricted through staffed or locked access gates. The property's perimeter is bounded by a continuous chain link fence. There is lighting provided throughout the facility by pole lamps controlled by photocells, and lights mounted on the buildings. There are security routes covering the facility that are followed by plant security on a regular schedule. Site security is provided by Securitas. The main gate is staffed 24 hours per day, seven days per week, and there is an in-plant alarm system located in the security office. Regular security rounds are made on weekends and holidays.

The facility comprises approximately 3.1 million square feet of floor space located on a site of 228 acres. The principal activity at the site is manufacturing. The facility began operations in 1948. Plant manufacturing activities include stamping and assembly of pressed metal parts at the Main Building and machining of transmission parts at the Powertrain Division in the South Building. These two divisions comprise the GM Parma Complex. The Standard Industrial Classification (S.I.C.) Code for the facility is 3714.

2.1.1 Storage Description

Oils are used and stored throughout the GM Parma Complex. These products are stored indoors in 55-gallon drums and totes to 500-gallon capacity, and outdoors in aboveground storage tanks. There are no underground storage tanks located on-site. The typical operations and oil use and storage for the operating units within the facility are described in the following sections. Refer to Table 1 through Table 7 for an inventory of the containers, oil products and locations of these oil storage areas.

The facility has a Stormwater Retention Reservoir located south of the WTP. Runoff from outdoor surfaces on southwest, southeast, and northeast quadrants of the site, as shown in Figure E-1 by the flow direction arrows, is collected here after passing through an oil/water separator. The pond outfall can be manually operated, and if a release occurs at the facility, the pond discharge can be closed off to prevent the released material from going any further. Runoff from outdoor surfaces on the northwest corner of the site is collected at an oil/water separator located along Brook Park Road. There is no oil storage outdoors in the northwest corner of the site.

The building construction floor and basements provide suitable containment for in-plant container releases during normal operating conditions. Impacts from these smaller containers (from 55 gallons to 500 gallons) due to any catastrophic failure would be contained and discovered promptly to affect response and clean up. The occurrences of small spills of oil inside plant walls can be handled with absorbent materials available in Crib 1, located in the Main Plant, at the center of the South Building

and throughout the site, as described in Table 8. If needed, floor scrubbers and wet vacuums are also available. In the unlikely event an oil spill would enter a sealed and bolted stormwater manhole, the oil/water separator and/or Stormwater Retention Reservoir would be utilized to contain any contaminated materials for collection and transfer to treatment processes. Additionally, vacuum trucks, sewer jetting and clean up capabilities exist with the contractors listed in the Internal Notification Flowchart located in the front cover of this SPCC Plan.

Run-off collection system improvements were made in 2003 to the westerly equipment storage pads where discharges of oil from other items may have occurred. This collection system and skimmer provides oil discharge prevention for areas not historically covered by the Stormwater Retention Reservoir system design. The collection system design provides for the collection of residual hydraulic and lube oils and other pollutants that could contaminate storm water run-off from these equipment storage pads and directs the runoff through an oil collection device prior to discharge into the Stormwater Retention Reservoir. The oil collection system and outfall to the Stormwater Retention Reservoir are included on the routine inspection and maintenance logs (Table A-6 in Appendix A) kept for the purpose of meeting requirements for spill response and countermeasure provisions of 40CFR112.7(a)(3).

2.1.2 Hazardous Materials Building

The Hazardous Materials Building holds 300 to 500-gallon totes and 55-gallon drums of draw, hydraulic, machine, quench, and spindle oils, cleaners, mastics, adhesives, and liquid hazardous waste. The Hazardous Materials Building is also used for tote transfer and filling operations. Totes are filled and stored inside.

Empty 55-gallon drums and empty totes are stored outside the south wall of the building. The area is fully paved with secondary containment and there is a catch basin that drains to the Stormwater Retention Reservoir and the oil/water separator.

2.1.3 Mobile Tanks

Valves on portable totes are capped inside the building prior to being transferred between buildings. Full totes are stored inside the Hazardous Material Building.

2.1.4 Used Oil Containers

Used oil drums will be taken to Column W-45. Drums must be labeled with a "Used Oil" label. Maintenance will take these drums to the Waste Treatment Plant for transfer off-site. Used oil totes from A, B, and C bay basements will be taken to the Hazardous Material Building for on-site reclaim.

2.1.5 Empty Mastic Drums and Mastic Waste

Empty mastic drums, mastic waste drums and any other open top bolted ring drums will be taken to R-71. Maintenance will consolidate the waste mastic and maintain a supply of empty drums. Drums must be labeled with a green and white "Non-hazardous Waste" label marked "Waste Mastic". Final disposal location is off-site at American Landfill.

2.1.6 Oil Absorbents Management

Spent oil absorbent socks and matting will be placed in designated open top drums. Drums must be labeled with a green and white "Non-hazardous Waste" label or marked "Oil Absorbents". Full drums are to be taken to R-71 by Maintenance Truck Drivers. There they will be emptied and disposed of in the industrial waste roll-off. Transmission departments may dispose of absorbents in grinding sludge

hoppers. Final disposal location is off-site at American Landfill.

2.1.7 Waste Treatment Plant

The Waste Treatment Plant (WTP) is located near the southwest corner of the main building, north of the Stormwater Retention Reservoir. The WTP building has several tanks inside that contain petroleum products. A listing of tanks in the WTP can be found in Table 1. The interior of the building is fully paved and there are a series of trench drains around the groups of tanks to capture spilled material. Following treatment, the treated effluent is discharged into a sanitary sewer and conveyed to the Northeast Ohio Regional Sewer District (NEORSD) POTW. Sanitary water systems also feed directly into the sanitary sewer system.

2.1.8 Underground Storage Tanks

No underground or partially buried tanks exist at the facility; therefore this section does not apply.

2.1.9 Aboveground Storage Tanks

The GM Parma Complex has the capacity to store oil and petroleum products within the Complex in aboveground storage tanks. The principle location that was formerly used for bulk oil storage is at the oil tank farm outside of the Powerhouse. This area is within a completely enclosed earthen dike that provides approximately 81,000 gallons of secondary containment. The tank farm has ten 12,000-gallon capacity tanks. All of the tanks are currently empty but not permanently closed. The former contents of the tanks can be found in Table 1.

A second tank farm is located at the WTP and is also within a completely enclosed earthen dike that provides approximately 125,000 gallons of secondary containment. The former contents of the tanks in the WTP tank farm are listed in Table 1. All tanks are currently empty but are not permanently closed.

2.2 Release Reporting [40 CFR 112.7(a)(4)]

As of the production date of this document, there have been no spill episodes involving significant quantities of oil and/or other petroleum products which have impacted navigable waters of the United States from or at the GM Parma Complex. Spill Reports from 1988 to Present and a Spill History log are included as Table A-8 in Appendix A as a record of previous incidents and to track any future spills or releases.

Minor spillage has occurred during the transfer of oil; however, those spills have occurred inside the facility itself and have not migrated off site or reached navigable waters of the United States. When minor spillage of oil occurs, GM Parma Complex personnel collect the spilled material and dispose of it in accordance with applicable regulations. An inventory of emergency response equipment to be used to manage these spilled materials is included in Table 8 of this document. Spent absorbent material is disposed in accordance with applicable regulations.

Any spill or release that enters the waters of the United States in harmful quantities must be reported to the governing agency as directed in Section 1.4.1. See also Appendix B for External/Internal Notification Flowchart and a sample confirmation letter. Harmful quantities are defined in Part 110 as a discharge which affects the water quality standards or causes a film or sheen upon or discoloration of the water or adjoining shorelines.

In addition, Ohio defines a reportable release as a release of 25 gallons or more of oil into the environment, or less than 25 gallons that cannot be cleaned up within 24 hours of discovery. The information that should be collected and used for reporting includes:

- Exact address or location and phone number of the facility
- Date and time of discharge
- Type of material discharged
- Estimate of the total quantity discharged
- Estimates of the quantity discharged as described in Section 112.1(b)
- The source of the discharge
- A description of all affected media
- The cause of the discharge
- Any damage or injuries caused by the discharge
- Actions being used to stop, remove, and mitigate that effects of the discharge
- Whether an evacuation may be needed
- The names of individuals and/or organizations who have also been contacted

2.3 Emergency Response Procedures [40 CFR 112.7(a)(5)]

The GM Parma Complex is not required to prepare a Facility Response Plan in accordance with 40 CFR 112.20.

- In the event of an oil spill or other incidental release:

    1. Notify plant maintenance by radio, phone or pager for spill clean up.
    2. Maintain communications between the incident and the maintenance department to obtain additional personnel or equipment as required.
    3. Prevent spread of the material, especially into drains or sewers.
    4. Cordon off spill area to prevent tracking.
    5. The maintenance department will:

        A. Pump or absorb spilled material.
        B. Transfer to recovery container.
        C. Decontaminate the spill area.
        D. Transfer clean up debris into recovery container.
        E. Properly label/identify recovery containers.
        F. Transport containers to storage area.

Equipment and supplies used to mitigate a release of oil is also included in Table 8 of this document. See also Appendix D for Spill Discovery and Notification Procedure and Emergency Shutdown of Stormwater Belt Skimmer Weir & Retention Reservoir Instructions.

2.4 Fault Analysis [40 CFR 112.7(b)]

There is a limited potential for equipment failure (such as a tank overflow, rupture, or leakage) at the GM Parma Complex. In addition, there is a low probability for any released material to flow off-site and reach the navigable waters of the United States. This can be attributed to several factors:

- Materials are stored in ASTs, totes, and 55-gallon drums and are located in areas generally equipped with secondary containment. Process sumps located in these areas collect accumulated fluids and convey them to the wastewater treatment system for treatment.

- Equipment that uses oil and other petroleum products are used and stored indoors.
- All off-loading of used oil and new oil by tanker trucks is conducted under close supervision using the bulk material loading and unloading procedures described in Appendix C of this SPCC document. In addition, the bulk tanks and off-loading areas are located in secondary containment structures where any released materials would be cleaned up immediately, or would drain into sumps where they would be conveyed to the wastewater treatment plant.
- Routine inspections of overhead piping and storage structures are performed to identify leaks and failures, and
- There are no floor drains in the plant buildings that connect to stormwater systems.

Lists of significant storage units at the GM Parma Complex are presented in Table 1 through Table 7 of this document. Included in these lists are tank locations, storage capacities, tank contents and the fate of oil materials that could be spilled.

The facility has a Stormwater Retention Reservoir with a capacity of 15 million gallons located south of the WTP. Storm water runoff from the southwest, southeast, and northeast quadrants of the site, as shown in Figure E-1, is collected here after passing through an oil/water separator. The pond outfall can be manually operated, and if a release occurs at the facility, the pond discharge can be closed off to prevent the released material from going any further. A spill from any of the above tanks would be directed via storm drainage to the reservoir. A second oil/water separator is located along Brook Park Road. Runoff from the northwest quadrant of the site is directed toward this separator.

A portion of the GM Parma Complex is not paved and a significant portion of stormwater from these areas would be absorbed into the ground or gravel surfaces. All roof drains are directed to the facility's stormwater sewer system. The discharge of the stormwater from the facility is conducted under the terms of a site-specific Stormwater Permit as issued by the Ohio EPA.

The facility is not located within a 100 year Flood Plain according to the FEMA maps for the area. Most stormwater at the GM Parma Complex drains to the Stormwater Retention Reservoir where it is held until released to a sewer that empties to an unnamed tributary of Big Creek. Sanitary waste and treated industrial waste is sent to the Northeast Ohio Regional Sewer District. Refer to Figure E-1, SPCC Facility Drawing.

2.5 Containment and Diversionary Structures [40 CFR 112.7(c)]

Most of the storage or process units described in Tables 1 through 7 are either located within a building that provides secondary containment, or are equipped with a secondary containment at the point of storage. The Stormwater Retention Reservoir and/or oil/water separators provide containment for the tanks that are not equipped with their own secondary containment structures. Impacted water accumulating in areas of secondary containment can be pumped to holding tanks within the WTP to await treatment and discharge into the sanitary sewer. There are no drains in the diked areas. Stormwater that accumulates in diked areas must be pumped to the WTP.

2.6 Contingency Planning [40 CFR 112.7(d)]

Most of the oil stored on-site is stored indoors. Outdoor storage includes two unused tank farms near the facility wastewater treatment plant and several diesel fuel tanks. Any release of oil that occurs in indoor areas will be contained within the building in which it is stored. Any release of oil in outdoor areas will be contained in diked areas, secondary containment structures or directed to an oil/water separator and/or the Stormwater Retention Reservoir. Therefore, a release to navigable water is

reasonably prevented. In addition to the containment structures and/or equipment listed in Table 8, the GM Parma Complex will employ manpower, equipment, and materials to expeditiously control and remove any harmful quantity of oil discharge that may affect navigable waters. An oil spill contingency plan following the requirements of 40 CFR 109 is not required. However, the facility has developed spill reporting and response procedures in Appendix D.

2.7 Inspections, Tests, and Records [40 CFR 127.7(e)]

The inspection program presented herein is intended to provide a visual inspection mechanism to prevent and detect system malfunctions, equipment deterioration, and operator errors. The inspection program is designated to provide an early warning of the potential for such events in order that corrective and preventative actions may be taken in a timely manner.

The inspection program focuses on oil tote, tank and container integrity, emergency equipment and site security. The program is intended to be implemented by qualified and trained individuals assigned the responsibility to detect any unsafe conditions at the facility and prevent adverse consequences. The designated individuals have the training and authority to:

- Conduct the required inspections.
- Perform necessary evaluations and hazard assessments.
- Recommend appropriate corrective actions.

The inspection is performed according to a pre-determined schedule based on engineering knowledge and operational experience with the systems, equipment, and processes involved. Each inspection item has the content and frequency necessary to alert facility personnel prior to the development of a serious problem. The Environmental Engineer (EE) and/or his/her designee will evaluate and assess each item indicating a potential deficiency, malfunction, equipment deterioration, or operator error through regular observation of the processes and procedures. The level of response and its timing is determined by the nature and severity of the problem identified with the protection of personnel and the prevention of adverse environmental impact being a paramount concern.

2.7.1 Administration of Inspection Program

The EE or his/her designee is fully responsible for the implementation of the inspection program. The inspection function operates independently of all other facility functions related to operations. Inspection reports, with appropriate documentation, are made directly to the EE. The EE or his/her designee is then responsible for directing the required corrective action.

2.7.2 Inspections, Documentation and Recordkeeping

Non-documented inspections occur daily and consist of a walk through of the facility. The walk through checks oil containers and tanks for damage or leakage, stained or discolored areas on the floor and/or ground and for excessive accumulation of water and/or oil in containment areas.

Monthly inspections and re-inspections are conducted and documented using the SPCC Plan Monthly Checklist forms. Refer to Table A-3 in Appendix A for a copy of the SPCC Plan Monthly Checklist Summary. In addition, included in Appendix A is the SPCC Plan Walk-Around Checklist. The inspection activity encompasses the oil storage containers, tanks and associated equipment such as piping and containment. In addition, security procedures and emergency equipment are inspected.

Each monthly inspection should be noted as completed on the Storage Unit Monthly Inspection Log, Table A-4. A Weekend/Holiday Inspection Sheet is contained in Appendix A Table A-5.

Completed forms are provided to the EE or his/her designee who then takes action, as necessary to implement required corrective measures. All completed forms and attachments are accumulated in the facility operating records. These are retained at the GM Parma Complex for a period not less than 3 years from the date of an inspection.

An inspection form is used to record significant information, such as records of observations, equipment identification, and the name of the inspector, the date of the inspection, and urgency or corrective action. Corrective action re-inspection status is also reported on an inspection form. It is used for corrective action initiation and to document whether each discrepancy noted during an earlier inspection has been adequately corrected. This additional inspection form identifies the equipment involved and the nature of the discrepancy.

In summary, the EE or his/her designee observes facility operations and equipment on a periodic basis, in accordance with his specific schedule and is responsible for corrective action.

2.8 Training and Discharge Prevention Procedures [40 CFR 112.7(f)]

Newly hired personnel responsible for handling or dispensing of oil participate in spill prevention and control training. Training includes direction 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 existence and contents of the facility SPCC plan.

All GM Parma Complex employees receive General Motors Health and Safety Training. Appropriate personnel will also receive Spill Awareness, RCRA training, U.S. Department of Transportation (DOT) training, and Safe Use training. A record of personnel training required for the SPCC Plan shall be kept in the EE's files and personnel department files.

The EE has been designated as the person who is accountable for discharge prevention and who reports to facility management.

GM provides yearly spill prevention briefings for oil-handling personnel to ensure adequate understanding of the SPCC Plan. These briefings highlight any past spill events or failures, malfunctioning components, and recently developed precautionary measures. The Environmental Engineer will schedule and conduct spill prevention briefings for operating personnel at intervals frequent enough to assure adequate understanding. The briefings will highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Successfully completed training of employees shall be documented by their Training Departments. Trainers used by GM Parma are qualified to instruct employees about the subject matter that is being presented in training. Trainers shall have satisfactorily completed a training program for teaching the subjects they are expected to teach, or they shall have the academic credentials and instructional experience necessary for teaching the subjects. Instructors shall demonstrate competent instructional skills and knowledge of the applicable subject matter.

Training has been held on oil spill prevention, containment and retrieval methods. Records of these spill prevention training are kept in the EE's files.

2.9 Security [40 CFR 112.7(g)]

To restrict access to the facility grounds, the property is secured using chain-link with barbed-wire fencing, and surveillance cameras. Access to the facility building is controlled through manned access gates. Contract security guards man the facility 24 hours per day, 7 days a week. Fencing and access gates manned by security forces restrict access to the facility grounds beyond the parking areas. The main access to the GM Parma Complex is from Chevrolet Boulevard on the east side of the Complex. One asphalt parking lot is located near the southeast corner of the main building, and another is located across Chevrolet Boulevard to the east of the main building.

Visitors and employees enter through the main entrance gate or the visitors lobby, located off Chevrolet Boulevard, or the gates at the south parking lot or Powertrain lot. Visitors to the GM Parma Complex are required to check in at the Main Security Post located at the plant entrance. All visitors must be escorted within the property by company personnel. Entry by employees is by a controlled card key system.

Trucks may enter the plant via a gate located on the northeast corner of the property. These areas are monitored by Security at all times. Only upon approval from Security will the truck driver be permitted entry into the plant. Additional security controls in place at the facility consist of:

1. Valves on the totes/tanks are secured in the closed position when in non-operating or non-standby status and are located in an area accessible only to authorized personnel.

2. All pumps are in the "off" position and located in an area accessible only to authorized personnel when the pumps are in a non-operating or non-standby status.

3. All valves, pump controls, unloading/loading connections, and any other equipment which may cause spillage of oil related or critical materials are secured by locking, capping, or other acceptable means when in non-operating or non-standby status and are located in an area accessible only to authorized personnel.

4. Lighting at the plant is sufficient to illuminate all areas of concern and will assist in the discovery of discharges occurring during hours of darkness by plant personnel or others, and help prevent discharges caused by vandalism.

2.10 Bulk Loading and Unloading Procedures [40 CFR 112.7(h)]

The unloading/loading procedures outlined in Appendix C of this plan are to be used for the prevention of accidental spills during the unloading/loading of transport vehicles. Unloading/loading procedures meet or exceed the minimum requirements and regulations of the Department of Transportation. Appropriate plant personnel check all tanker truck drains and outlets for leakage prior to unloading or loading. These personnel are also responsible for visual surveillance during the entire period of unloading/loading operations and to prevent vehicular departure before disconnection of transfer lines. Tanker trucks must follow designated routes while on GM Parma property as instructed by plant Security personnel or any other GM Parma Complex personnel. Because of the plant procedures for bulk transfer, including manned operations, the complex does not employ remote means such as level alarms.

See Appendix C for a copy of the written procedures for truck loading/unloading.

If vehicles carrying containers of oil found to be damaged or leaking are not consigned to the GM Parma Complex and enter the plant, receiving dock personnel are instructed to instruct the carrier to immediately arrange for spill cleanup and material repacking if necessary. If the Environmental Engineer determines that the spill is incidental and presents no immediate danger to either persons or property, the following will apply:

- If the damaged material is neither consigned to, or the property of the GM Parma Complex, receiving dock personnel will instruct the driver of the vehicle to immediately contact his nearest terminal for assistance.
- If the damaged material is consigned to, or is the property of the GM Parma Complex, GM will assume responsibility for clean up. Receiving dock personnel will notify Security immediately. Security will notify Maintenance and Plant Environmental Department. These groups will inspect the area and determine the appropriate clean-up techniques to be employed.

When large quantities of oil are involved or when the leakage cannot be immediately contained and it is necessary to move the vehicle to a containment site, the Emergency Coordinator shall be notified and shall take appropriate measures.

All residues generated by spill clean up are managed appropriately and residues are packaged, labeled and stored in accordance with applicable regulations.

2.11 Field-Constructed Container Repair [40 CFR 112.7(i)]

Any field-constructed aboveground container undergoing a repair, alteration, reconstruction, or a change in service, that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, will be evaluated by an appropriately trained competent person, for the risk of discharge or failure due to brittle fracture or other catastrophe. If deficiencies are identified by this person, appropriate actions will be undertaken before the tank is placed or returned to service.

2.12 Additional Prevention Standards [40 CFR 112.7(j)]

Additional prevention standards are not necessary at the time of the original SPCC development. As necessary, additional prevention standards developed in the future will be added to this section.

3.0 ADDITIONAL REQUIREMENTS

3.1 Other Applicable Guidelines [40 CFR 112.8(a) and 112.12(a)]

The preceding section 2.0 contains general information to conform to the applicable section of Part 112.7 required of all applicable facilities. The following subsections conform to 40 CFR 112.8 and 112.12 for onshore facilities.

3.2 Facility Drainage [40 CFR 112.8(b) and 112.12(b)]

All unused oil is stored in areas where containment is provided (i.e. indoors, within containment areas, on containment pallets, under roofs). Drainage from the facility occurs through separate sanitary sewer systems to the Northeast Ohio Regional Sewer District, stormwater roof drains to the Stormwater Retention Reservoir and/or oil/water separator, and process drains to the facility's Waste Treatment Plant. Other methods utilized at the GM Parma Complex to prevent oil from reaching navigable waters in the event of equipment failure or human error include:

- Tanks in the tank farms, located to the east of the Water Treatment Plant were formerly used for the bulk storage of various oil products, including engine oil The locations of these tanks are shown in Figure E-1. The capacities of these tanks are provided in Table 1.
- Spill containment structures associated with the facility include:
  - Containment around the tanks located in the facility wastewater treatment plant.
  - Containment structures around most outdoor ASTs that are used to store fuel for company and contractor vehicles located throughout the facility.
  - Plastic portable containment dikes are used in some areas to store 55-gallon drums.
  - There are no storage areas that could flow directly to Outfall 001. Any spills that would occur at the facility would most likely be confined within the facility.

Facility drainage systems have been adequately engineered to prevent oil from reaching navigable waters.

3.3 Bulk Storage Tanks [40 CFR 112.8(c) and 112.12(c)]

All storage unit materials are compatible with the substances that they contain. Any storage units installed at the facility in the future must be compatible with the materials they will store in them.

Bulk storage tanks are located both inside and outside of the facility. Bulk oil is contained in single-walled steel ASTs or single-walled steel tote/drum provided by the oil vendor.

The containment dikes at the Complex are not equipped with drain valves. The valves on the tanks are inspected during the regularly scheduled inspections to verify that they are closed when unattended. Secondary containment structures are pumped out as necessary (i.e. a responsible person will determine that no oil exists and record the drain event). Contaminated stormwater from these containment structures would be transferred to the wastewater treatment facility for treatment prior to discharge.

There are no partially buried metallic tanks at this facility.

The above ground oil storage tanks are visually inspected on a regular basis to assess tank integrity. Oil storage areas are formally inspected on a monthly basis for:

- Evidence of leaks or spills
- Accumulation of oil inside diked areas
- Corrosion deterioration
- Supports and foundation deterioration
- Tote/tank auxiliary equipment integrity
- Containment structure deterioration

Signed and dated records of inspections and other pertinent information such as the replacement and/or repair of tote/tank equipment are kept on file. See Appendix A, for a copy of the inspection form and inspection records.

Routine, weekly visual inspection (Table A-7 in Appendix A) of storage tanks, treatment tanks, sump pits within diked areas, processing tanks and piping systems are performed by the Powerhouse and Wastewater Treatment Plant personnel for such equipment within their areas. Preventive maintenance will be accomplished to minimize the potential for spillage. Records are maintained in the Powerhouse.

The tanks in the oil tank farm have steam heating coils. These tanks and heating coils are inspected weekly as part of ISO Inspections. Inspection includes periodic checks to confirm that the heating coils are not cross contaminated.

The possibility of a significant petroleum release from the tank installations is reduced by the following equipment/procedures:

- Oil ASTs, totes, and drums are located indoors, are stored in areas equipped with secondary containment, or are equipped with secondary containment to prevent a release of material. An outdoor release is significantly limited.
- Manual control and oversight is provided by trained facility employees during all movements of petroleum products.
- All storage units are located such that they are within close view of the daily operations conducted at the facility.
- All ASTs, totes, and drums are located in secured areas. Mobile equipment ASTs are located within secondary containment. Tanks for electrical generators are topped off by manned operations.
- No treated plant effluents are discharged into navigable waters.
- Visible oil leaks that result in a loss of oil from tank/tote seams, gaskets, rivets and bolts, and other equipment sufficiently large enough to cause the accumulation of oil are corrected or contained.
- Mobile or portable oil storage containers are stored away from potential drainage paths to outside areas. All indoor portable or mobile tanks are stored away from doorways so that a complete release of oil contents would be contained within the building.
- All contractor portable oil storage containers are reported to the Environmental Engineer prior to being brought on-site and are required to be in a contained area to prevent a release of material to the environment.

3.4 Facility Transfer Operations [40 CFR 112.8(d) & 112.12(d)]

Piping running from the unused oil tank farm to the oil pump house is enclosed in an outer pipe. Piping running from the oil pump house to the plant runs in concrete trenches or tunnels. Load/unload connections are capped or blind-flanged when not in service for an extended time. Connections that are used frequently and have been provided with sufficient secondary containment may be valved-off when

unattended. When an above ground pipe is not in service, or is in standby service for extended lengths of time, valves are kept closed and the pipe marked as to its origin.

Pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Pipes and pipe supports for bulk delivery are located above vehicle traffic. Pipe supports are routinely inspected as part of the general facilities inspection.

All above ground valves and pipelines that aren't contained within the building are routinely inspected as indicated in Section 2.7.

Bollards, guardrails, and signs are utilized to prevent vehicular traffic from colliding with overhead piping. Traffic warning signs are put in place when loading or unloading tank trucks. The vehicles are inspected for leaks prior to departure.

3.5 Other Sections of SPCC Regulations

40 CFR Parts 112.9, 10, 11, 13, 14 and 15 apply to oil production, drilling or workover facilities and therefore do not apply to the GM Parma Complex.

3.5.1 Storm Water Discharge to Municipal Systems

This Complex discharges storm water associated with industrial activity through a municipal separate storm sewer system serving a population of 100,000 or more. Consequently, stormwater permittees shall make plans available upon request to the municipal system operator.

3.5.2 Monitoring Program and Sampling Data

This facility is required to conduct monitoring of storm water outfalls under the coverage provisions of the existing permit. The existing site-specific stormwater discharge permit (and coverage under this permit) expires on 31 March 2009.

TABLE 1

GM PARMA TANK LISTING

TANK NO.	CAPACITY (gal)	DESCRIPTION/CONTENTS	LOCATION	INDOOR / OUTDOOR	FATE OF SPILL
2	400,000	HOLDING TANK-OILY WASTEWATER	SOUTH OF WASTE TREATMENT PLANT	OUTDOOR	TOWARD RESERVOIR
11	20,000	EMPTY (Formerly: Used Oil)	WASTE TREATMENT PLANT TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
12	20,000	EMPTY (Formerly: Used Oil)	WASTE TREATMENT PLANT TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
13	5,200	EMPTY (Formerly: Used Oil)	WASTE TREATMENT PLANT TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
14	5,200	EMPTY (Formerly: Used Oil)	WASTE TREATMENT PLANT TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
15	5,200	EMPTY (Formerly: Used Oil)	WASTE TREATMENT PLANT TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
16	25,000	EMPTY (Formerly: Used Oil)	WASTE TREATMENT PLANT TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
17	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
18	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
19	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
20	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
21	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
22	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
23	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
24	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
25	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
26	12,000	EMPTY (Formerly: Oil)	OIL TANK FARM	OUTDOOR	CONTAINED IN EARTHEN DIKE
27	15,000	OILY WATER SKIM OIL	WASTE TREATMENT PLANT-1ST FLOOR	INDOOR	CONTAINED ON BUILDING FLOOR
28	15,000	OILY WATER SKIM OIL	WASTE TREATMENT PLANT-1ST FLOOR	INDOOR	CONTAINED ON BUILDING FLOOR

TABLE 1

GM PARMA TANK LISTING

TANK NO.	CAPACITY (gal)	DESCRIPTION/CONTENTS	LOCATION	INDOOR / OUTDOOR	FATE OF SPILL
29	10,000	RAG OIL AND WATER	WASTE TREATMENT PLANT-1ST FLOOR	INDOOR	CONTAINED ON BUILDING FLOOR
30	5,000	WASTEWATER MIX #2	WASTE TREATMENT PLANT-2ND FLOOR	INDOOR	CONTAINED ON BUILDING FLOOR
31	5,000	WASTEWATER MIX #1	WASTE TREATMENT PLANT-2ND FLOOR	INDOOR	CONTAINED ON BUILDING FLOOR
32	5,000	WASTEWATER MIX #3	WASTE TREATMENT PLANT-2ND FLOOR	INDOOR	CONTAINED ON BUILDING FLOOR
33	5,000	WASTEWATER MIX #4	WASTE TREATMENT PLANT-2ND FLOOR	INDOOR	CONTAINED ON BUILDING FLOOR
82	290	DIESEL FUEL	FIRE PUMP #3	INDOOR	TOWARD RESERVOIR
84	290	DIESEL FUEL	FIRE PUMP #2	INDOOR	TOWARD RESERVOIR
85	300	KEROSENE	WEST OF POWERTRAIN	OUTDOOR	TOWARD RESERVOIR
86	500	DIESEL FUEL	POWERHOUSE EMERGENCY GENERATOR	OUTDOOR	TOWARD RESERVOIR
87	290	DIESEL FUEL	FIRE PUMP #1	INDOOR	CONTAINMENT
88	500	DIESEL FUEL	NORTH OF POWERTRAIN	OUTDOOR	TOWARD RESERVOIR
89	250	DIESEL FUEL	SCREW PUMPS	OUTDOOR	TOWARD RESERVOIR
90	1,500	DIESEL FUEL	HAZARDOUS STORAGE BUILDING CONTAINMENT	OUTDOOR	CONTAINMENT
91	500	GASOLINE	HAZARDOUS STORAGE BUILDING CONTAINMENT	OUTDOOR	CONTAINMENT
94	1,000	USED OIL & WATER	RESERVOIR	OUTDOOR	TOWARD RESERVOIR
95	5,000	EMPTY (was GM6019)	COLUMN W-17 IN MAIN BUILDING	INDOOR	CONTAINED ON BUILDING FLOOR
96	5,000	EMPTY (was GM6019)	COLUMN W-17 IN MAIN BUILDING	INDOOR	CONTAINED ON BUILDING FLOOR
97	200	CAFETERIA GREASE	OVERHEAD DOOR 8	OUTDOOR	TOWARD RESERVOIR
98	273	DIESEL FUEL	S/B K-7	INDOOR	CONTAINED ON BUILDING FLOOR

TABLE 1

GM PARMA TANK LISTING

TANK NO.	CAPACITY (gal)	DESCRIPTION/CONTENTS	LOCATION	INDOOR / OUTDOOR	FATE OF SPILL
117	60	DIESEL FUEL	U-2 CITY WATER	INDOOR	CONTAINED ON BUILDING FLOOR
118	70	DIESEL FUEL	F-39 SUB #1	INDOOR	CONTAINED ON BUILDING FLOOR
	2 320-gal TOTES 4 55-gal DRUMS	HYDRAULIC AND USED OIL	WASTE TREATMENT PLANT- 1ST FLOOR, EAST	INDOOR	CONTAINED ON BUILDING FLOOR
	80	DIESEL FUEL	MOBILE, PARKED NEAR SW CORNER OF MANUFACTURING BUILDING	OUTDOOR	TOWARD RESERVOIR

TOTAL CAPACITY OF WASTE TREATMENT PLANT STORAGE = 60,860 gallons

TOTAL CAPACITY OF ALL TANKS IN TABLE 1 = 1,227,563 gallons

TABLE 2

METAL FABRICATION EQUIPMENT CAPACITY LISTING

Property Tag #	Capacity (gal)	Description	Location	Year Installed	Tank Details / Material	Fate of Spill
	500	A-22 LUBE OIL	A-22 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	525	B-28 DA LUBE OIL	B-28 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	525	B-28 TR LUBE OIL	B-28 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	525	B-31 DA LUBE OIL	B-31 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	525	B-31 TR LUBE OIL	B-31 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	750	C-86 LUBE OIL	C-86 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	650	C-90 DA LUBE OIL	C-90 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	650	C-90 TR LUBE OIL	C-90 BASEMENT	1986	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	A-39 PROG PRESS LUBE OIL	A-39 BASEMENT	2001	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	300	A-39 PROG PRESS HYD OIL	A-39	2001	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	A-46 PROG PRESS LUBE OIL	A-46 BASEMENT	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	300	A-46 PROG PRESS HYD OIL	A-46	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	A-54 PROG PRESS LUBE OIL	A-54 BASEMENT	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	300	A-54 PROG PRESS HYD OIL	A-54	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	B-39 PROG PRESS LUBE OIL	B-39 BASEMENT	2001	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR

TABLE 2

METAL FABRICATION EQUIPMENT CAPACITY LISTING

Property Tag #	Capacity (gal)	Description	Location	Year Installed	Tank Details / Material	Fate of Spill
	300	B-39 PROG PRESS HYD OIL	B-39	2001	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	B-46 PROG PRESS LUBE OIL	B-46 BASEMENT	2001	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	300	B-46 PROG PRESS HYD OIL	B-46	2001	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	B-54 PROG PRESS LUBE OIL	B-54 BASEMENT	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	300	B-54 PROG PRESS HYD OIL	B-54	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	B-60 PROG PRESS LUBE OIL	B-60 BASEMENT	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	300	B-60 PROG PRESS HYD OIL	B-60	2000	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	690	B-65 PROG PRESS LUBE OIL	B-65 BASEMENT	2004	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	300	B-65 PROG PRESS HYD OIL	B-65	2004	ELEVATED STEEL	CONTAINED ON BUILDING FLOOR
	9,500	XFORM SILICON DIELECTRIC OIL	PRIMARY YARD		ELEVATED STEEL	TOWARD RESERVOIR
	9,500	XFORM SILICON DIELECTRIC OIL	PRIMARY YARD		ELEVATED STEEL	TOWARD RESERVOIR
	291	XFORM SILICON DIELECTRIC OIL	PT SUB 1C	1981	ELEVATED STEEL - ROOF SUBSTATION	CONTAINED ON BUILDING FLOOR
	291	XFORM SILICON DIELECTRIC OIL	PT SUB 1D	1981	ELEVATED STEEL - ROOF SUBSTATION	CONTAINED ON BUILDING FLOOR
	346	XFORM SILICON DIELECTRIC OIL	SUB 10 P&L 1		ELEVATED STEEL - ROOF SUBSTATION	CONTAINED ON BUILDING FLOOR
	304	XFORM SILICON DIELECTRIC OIL	SUB 12 P&L 1		ELEVATED STEEL - ROOF SUBSTATION	CONTAINED ON BUILDING FLOOR

TABLE 2

METAL FABRICATION EQUIPMENT CAPACITY LISTING

Property Tag #	Capacity (gal)	Description	Location	Year Installed	Tank Details / Material	Fate of Spill
M-17367	130	MATTISON	C-6		COOLANT	CONTAINED ON BUILDING FLOOR
M-17517	55	GRINDER	C-5		COOLANT	CONTAINED ON BUILDING FLOOR
M-571	55	STUDER GRINDER	C-5		COOLANT	CONTAINED ON BUILDING FLOOR
M-12570	55	CINCINNATI GRINDER	C-5		COOLANT	CONTAINED ON BUILDING FLOOR
M-19049	250	BLANCHARD	B-6		COOLANT	CONTAINED ON BUILDING FLOOR
M-17608	200	S&K MILL	A-4		COOLANT	CONTAINED ON BUILDING FLOOR
M-17504	200	DEVLIEG JIGMILL	A-9		COOLANT	CONTAINED ON BUILDING FLOOR
M-17504	60	DEVLIEG JIGMILL	A-9		COOLANT	CONTAINED ON BUILDING FLOOR
M-32188	250	BLANCHARD WAY LUBE	C-69		COOLANT	CONTAINED ON BUILDING FLOOR
NC2198	100	DELTA WELDER	G-51		COOLANT	CONTAINED ON BUILDING FLOOR
M-11053	125	BLANCHARD WAY LUBE	L-5		COOLANT	CONTAINED ON BUILDING FLOOR

TOTAL CAPACITY OF METAL FABRICATION EQUIPMENT = 34,282 gallons

TABLE 3

METAL FABRICATION STORAGE CAPACITY LISTING

Capacity	Description/Contents	Location	Fate of Spill
6 55-gal DRUMS	WAY AND SPINDLE OIL	A-4	CONTAINED ON BUILDING FLOOR
6 55-gal DRUMS	MINERAL SEAL, WAY OIL, AND HYDRAULIC OIL	A-7	CONTAINED ON BUILDING FLOOR
1 55-gal DRUM	MINERAL SEAL	A-9	CONTAINED ON BUILDING FLOOR
2 55-gal DRUMS	HYDRAULIC OIL	A-24	CONTAINED ON BUILDING FLOOR
4 320-gal TOTES	DRAWING COMPOUND AND USED OIL	A-32	CONTAINED ON BUILDING FLOOR
2 55-gal DRUMS	WAY AND USED OIL	A-32	CONTAINED ON BUILDING FLOOR
2 55-gal DRUMS	COOLANT	A-34	CONTAINED ON BUILDING FLOOR
1 320-TOTE	DRAWING COMPOUND	B-77	CONTAINED ON BUILDING FLOOR
1 320-gal TOTE	DRAWING COMPOUND	B-73	CONTAINED ON BUILDING FLOOR
2 320-gal TOTES	DRAWING COMPOUND	B-78	CONTAINED ON BUILDING FLOOR
1 55-gal DRUM	HYDRAULIC FLUID	A-79	CONTAINED ON BUILDING FLOOR
1 320-gal TOTE	DRAWING COMPOUND	B-81	CONTAINED ON BUILDING FLOOR
2 320-gal TOTES	DRAWING COMPOUND	B-89	CONTAINED ON BUILDING FLOOR
400 gal	USED OIL	B-91	CONTAINED ON BUILDING FLOOR

TABLE 3

METAL FABRICATION STORAGE CAPACITY LISTING

Capacity	Description/Contents	Location	Fate of Spill
2 55-gal DRUMS	USED OIL	B-91	CONTAINED ON BUILDING FLOOR
2 55-gal DRUMS	COOLANT	D-99	CONTAINED ON BUILDING FLOOR
12 320-gal TOTES	HYDRAULIC OIL AND DRAWING COMPOUND	A-85	CONTAINED ON BUILDING FLOOR
30 55-gal DRUMS	MINERAL SEAL, HYD, AND ATF	A-85	CONTAINED ON BUILDING FLOOR
1 55-gal DRUM	USED OIL	E-51	CONTAINED ON BUILDING FLOOR
300 gal MOBILE TANK	USED OIL	V-55	CONTAINED ON BUILDING FLOOR
2 55-gal DRUMS	HYDRAULIC OIL AND COOLANT	L-5	CONTAINED ON BUILDING FLOOR
1 55-gal DRUM	COOLANT	N-7	CONTAINED ON BUILDING FLOOR
12,000	COOLANT SYSTEM WITH PITS AND LARGE EMPTY TANK. NEED TO CHECK VOLUME.	S-67	CONTAINED ON BUILDING FLOOR
12,000	COOLANT SYSTEM WITH PITS AND LARGE EMPTY TANK. NEED TO CHECK VOLUME.	R-65	CONTAINED ON BUILDING FLOOR
2 250-gal TOTES	USED OIL	W-45	CONTAINED ON BUILDING FLOOR
81 gal	SAFETY KLEEN TANK	M-5	CONTAINED ON BUILDING FLOOR
81 gal	SAFETY KLEEN TANK	U-9	CONTAINED ON BUILDING FLOOR
8 55-gal DRUMS	GEAR AND MOTOR OIL	V-7	CONTAINED ON BUILDING FLOOR

TABLE 3

METAL FABRICATION STORAGE CAPACITY LISTING

Capacity	Description/Contents	Location	Fate of Spill
2 55-gal DRUMS	USED AND MOTOR OIL	W-5	CONTAINED ON BUILDING FLOOR
2 55-gal DRUMS	COOLANT	C-69	CONTAINED ON BUILDING FLOOR
20 55-gal DRUMS	USED OIL	PRESS BASEMENT	CONTAINED ON BUILDING FLOOR
4 250-gal TOTES	USED OIL	PRESS BASEMENT	CONTAINED ON BUILDING FLOOR
6,000	WASTEWATER	V-53 PIT	CONTAINED ON BUILDING FLOOR
8,000	WASTEWATER	V-53 PIT	CONTAINED ON BUILDING FLOOR

TOTAL CAPACITY OF METAL FABRICATION EQUIPMENT = 52,672 gallons

TABLE 4

POWERHOUSE EQUIPMENT AND STORAGE CAPACITY LISTING

Capacity	Description	Location	Process / Storage	Fate of Spill
215 gal	Air Compressor #2, I.R. #1X81	1st FLOOR	PROCESS	CONTAINED ON BUILDING FLOOR
215 gal	Air Compressor #4, I.R. #1X81	2nd FLOOR	PROCESS	CONTAINED ON BUILDING FLOOR
400 gal	Air Compressor #6, I.R. #1X4766	3rd FLOOR	PROCESS	CONTAINED ON BUILDING FLOOR
70 gal	Air Compressor #3 Ingersol Rand, I.R. #35110519	4th FLOOR	PROCESS	CONTAINED ON BUILDING FLOOR
55 gal	Air Compressor #7 Chicago Pneumatic	5th FLOOR	PROCESS	CONTAINED ON BUILDING FLOOR
4 55-gal drums	Compressor Oil	1st FLOOR, WEST WALL	STORAGE	CONTAINED ON BUILDING FLOOR
10 55-gal drums	Turbine and Hydraulic Oil	2nd FLOOR, EAST WALL	STORAGE	CONTAINED ON BUILDING FLOOR

TOTAL CAPACITY OF POWERHOUSE EQUIPMENT AND STORAGE = 1,725 gallons

TABLE 5

POWERTRAIN EQUIPMENT CAPACITY LISTING

Machine #	Location	Function	Department	Capacity (gal)	Product	Fate of Spill
14654	J4	Quenching Cast Iron	48	300	Ecocool 6019	Contained on Building Floor
14656	J1	Quenching Cast Iron	48	300	Ecocool 6019	Contained on Building Floor
14889	G3-E3	Drilling Aluminum	55	6,000	Ecocool 6019	Contained on Building Floor
15081	R5	Grinding Steel	52H	100	Ecocool 9A	Contained on Building Floor
15087	U3	Grinding Steel	53	100	Eco. AP71C	Contained on Building Floor
15088	U3	Grinding Steel	53	100	Eco. AP71C	Contained on Building Floor
15093	Q3	Grinding Steel	51	100	Eco. AP71C	Contained on Building Floor
15266	Q3	Grinding Steel	51	100	Eco. AP71C	Contained on Building Floor
15281 (442)	L12	Grinding Steel	52G	9,200	Ecocool 9A	Contained on Building Floor
15866	R3	Grinding Steel	51	100	Eco. AP71C	Contained on Building Floor
16677	T3	Grinding Steel	53	100	Eco. AP71C	Contained on Building Floor
17004	Q2	Grinding Steel	51	100	Eco. AP71C	Contained on Building Floor
17005	U2	Grinding Steel	53	100	Eco. AP71C	Contained on Building Floor
17007	T3	Grinding Steel	53	100	Eco. AP71C	Contained on Building Floor
17008	T3	Grinding Steel	53	100	Eco. AP71C	Contained on Building Floor
17013	R2	Grinding Steel	51	100	Eco. AP71C	Contained on Building Floor

TABLE 5

POWERTRAIN EQUIPMENT CAPACITY LISTING

Machine #	Location	Function	Department	Capacity (gal)	Product	Fate of Spill
17024	Q4	Quenching Steel	51	50	UCON A	Contained on Building Floor
17025	R2	Quenching Steel	51	50	UCON QUENCH-A	Contained on Building Floor
17026	Q1	Quenching Steel	51	50	UCON QUENCH-A	Contained on Building Floor
17068	P1	Turning Cast Iron	54	11,000	QUAKERAL 377	Contained on Building Floor
17097	R6	Polishing Steel	52H	35	Ecocool 9A	Contained on Building Floor
17098	R7	Polishing Steel	52H	35	Ecocool 9A	Contained on Building Floor
20543	G7	Lathes Aluminum	55	600	Ecocool 6019	Contained on Building Floor
NEW HENRY	F5	Lathes Aluminum	55	10,000	GEMSOL	Contained on Building Floor
20574	G5	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
20575	G5	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
20576	G4	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
20577	G4	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
20578	F4	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
20579	F4	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
20580	C3	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
20592	C3	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor

TABLE 5

POWERTRAIN EQUIPMENT CAPACITY LISTING

Machine #	Location	Function	Department	Capacity (gal)	Product	Fate of Spill
20593	C2	Lathes Aluminum	55	300	Ecocool 6019	Contained on Building Floor
285003	C5	DeBurring Aluminum	55	780	Emco 809	Contained on Building Floor
28530	C5	Honing Aluminum	55	300	Vasco 1000	Contained on Building Floor
28531	D5	Honing Aluminum	55	300	Vasco 1000	Contained on Building Floor
804A	H6	Turning & Boring Cast Iron	48	24,000	Ecocool 6019	Contained on Building Floor
804B	L1	Broaching Cast Iron	48	900	Ecocool 6019	Contained on Building Floor
804C	K4	Grinding Cast Iron	48	1,500	Qualstar	Contained on Building Floor
805A	K4	Grinding Cast Iron	48	1,500	Qualstar	Contained on Building Floor
805B	L5	Broaching Cast Iron	48	900	Ecocool 6019	Contained on Building Floor
	K7	Diesel Emergency Generator	48	273		Contained on Building Floor

TOTAL CAPACITY OF EQUIPMENT IN POWERTRAIN = 71,973 gallons

TABLE 6

POWERTRAIN STORAGE CAPACITY LISTING

Capacity	Description/Contents	Location	Fate of Spill
5 320-gal Totes	Coolant	B-9	Contained on Building Floor
40 55-gal Drums	Coolant and Quench Oil	B-9	Contained on Building Floor
30 55-gal Drums	Hydraulic, Circulating, and Gear Oil	B-10	Contained on Building Floor
5 320-gal Totes	Mineral Seal	B-10	Contained on Building Floor
2 55-gal Drums	Coolant	C-4	Contained on Building Floor
9 320-gal Totes	Coolant and Broach Oil	F-12	Contained on Building Floor
1 55-gal Drum	Mineral Seal	D-13	Contained on Building Floor
2 55-gal Drums	Coolant	P-8	Contained on Building Floor
1 320-gal Tote	Coolant	P-2	Contained on Building Floor
4 55-gal Drums	Hydraulic, Gear, and Used Oil	V-3	Contained on Building Floor
2 55-gal Drums	Used Oil	W-4	Contained on Building Floor
16 55-gal Drums	Hydraulic, Gear, and Motor Oil	W-5	Contained on Building Floor
2 320-gal Totes	Used Oil	A-5	Contained on Building Floor

TOTAL CAPACITY OF POWERTRAIN STRORAGE = 12,375 gallons

TABLE 7

HAZARDOUS MATERIALS STORAGE BUILDING CAPACITY LISTING

Capacity	Capacity (gal)	Description/Contents	Fate of Spill
3 320-gal Totes	960	Drawing Compound	Contained on Building Floor
60 55-gal Drums	3,300	Hydraulic,Gear, Motor and Quench Oil	Contained on Building Floor
13 275-gal Totes	3,575	Hydraulic and Gear Oil	Contained on Building Floor
8 300-gal Totes	2,400	Gear Oil	Contained on Building Floor
1 275-gal Tote	275	Mineral Seal Oil	Contained on Building Floor
4 55-gal Drums	220	Mineral Seal Oil	Contained on Building Floor
2 275-gal Totes	550	Coolant, Machining Fluid	Contained on Building Floor
1 320-gal Tote	320	Coolant, Machining Fluid	Contained on Building Floor
1 330-gal Tote	330	Coolant, Machining Fluid	Contained on Building Floor
1 450-gal Tote	450	Coolant, Machining Fluid	Contained on Building Floor
26 55-gal Drums	1,430	Coolant, Machining Fluid	Contained on Building Floor

TOTAL CAPACITY OF POWERTRAIN STRORAGE = 13,810 gallons

TABLE 8
Spill Response Equipment and Locations
GM Parma Complex

The following spill response equipment is available at the facility:

- Spill truck with spill response material and equipment. The spill truck is located at Column R-3.
- General Stores Cribs contain absorbent socks, matting, shovels, brooms, squeegees, and personal protective equipment. Cribs are located in Main Plant and at center of South Building.
- Hazardous material building - booms, absorbents and overpack drums.
- Yellow bellied sump sucker – Maintenance Dept.
- Mobile spill kit in Engineering Dept. Vehicle (passenger van)

Other personal protective equipment (i.e. gloves, boots, etc.) is located in key plant areas such as the waste treatment plant (WTP).

WFG JOB NO. SHEET NO.

LEGEND

- STORMWATER LINE
- DRAINAGE SWALE
- CATCH BASIN
- COVER
- MANHOLE
- TRENCH DRAIN (FALL 2002)
- PERFORATED DRAIN (FALL 2002)
- DRAIN PIPE (FALL 2002)
- GEOMEMBRANE (FALL 2002)
- FLOW DIRECTION

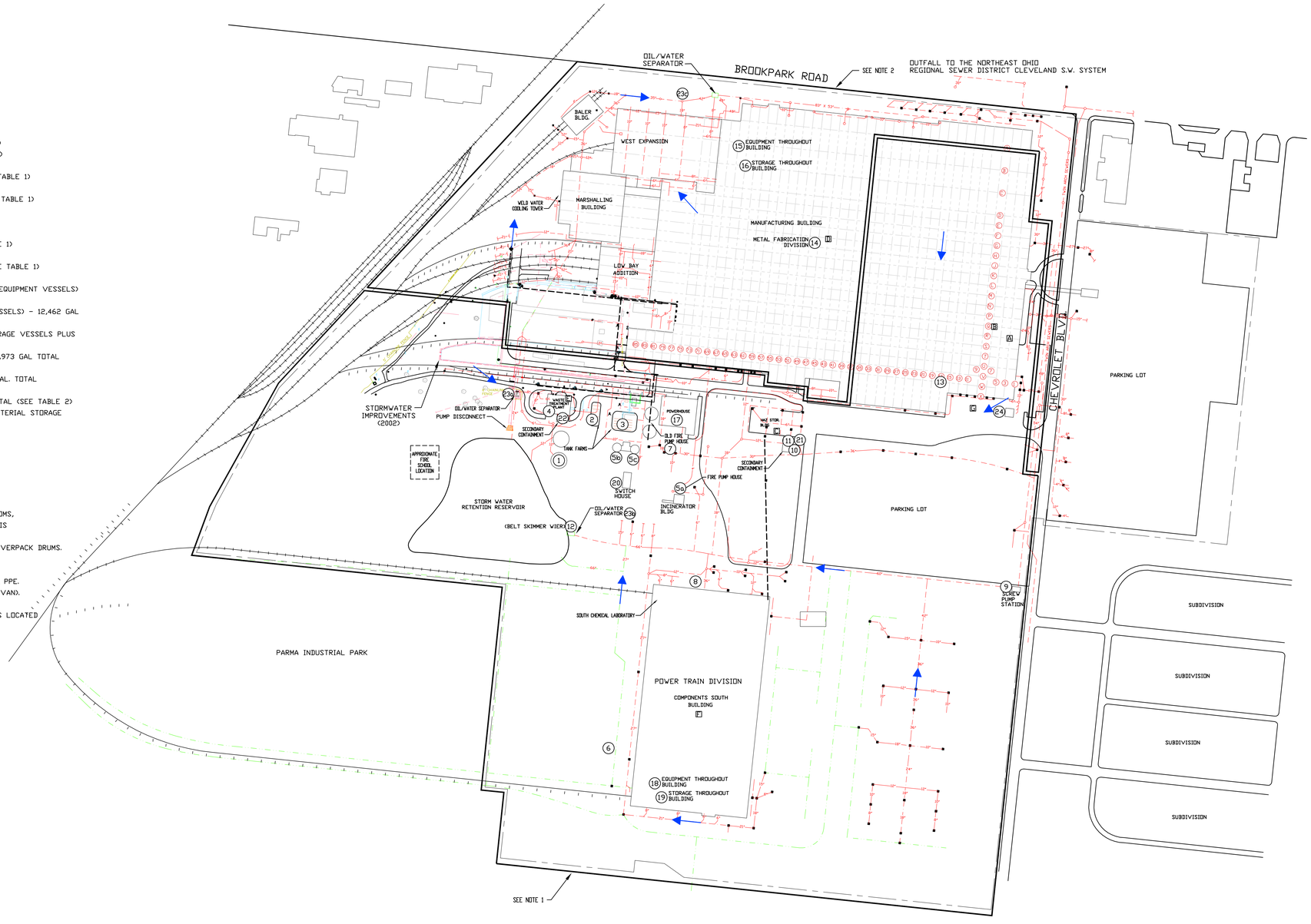
LOCATION LEGEND:

1. HOLDING TANK - 400,000 GAL.
2. WTP TANK FARM - 6 TANKS; 80,600 GAL. TOTAL (SEE TABLE 1)
3. OIL TANK FARM - 10 TANKS; 120,000 GAL. TOTAL (SEE TABLE 1)
4. WTP - INDOOR - 7 TANKS; 60,860 GAL. TOTAL (SEE TABLE 1)
5a,5b,5c. DIESEL FIRE PUMPS #1,2,3 - 3 TANKS; 870 GAL. TOTAL (SEE TABLE 1)
6. KEROSENE - 300 GAL. (SEE TABLE 1)
7. DIESEL POWERHOUSE EMERGENCY GENERATOR - 500 GAL.; (SEE TABLE 1)
8. DIESEL - 500 GAL. (SEE TABLE 1)
9. DIESEL SCREW PUMPS - 250 GAL. (SEE TABLE 1)
10. DIESEL - 1,500 GAL. (SEE TABLE 1)
11. GASOLINE HAZ. MAT. STORAGE BUILDING - 500 GAL. (SEE TABLE 1)
12. OIL & WATER AT RESERVOIR - 1,000 GAL. (SEE TABLE 1)
13. EMPTY (FORMERLY GM 6019) - 2 TANKS 10,000 GAL. TOTAL (SEE TABLE 1)
14. DIESEL F=39 SUB #1 - 70 GAL. (SEE TABLE 1)
15. METAL FABRICATION DIVISION STAMPING EQUIPMENT (VARIOUS EQUIPMENT VESSELS) - 15,282 GAL. TOTAL (SEE TABLE 2)
16. METAL FABRICATION DIVISION STORAGE (VARIOUS STORAGE VESSELS) - 12,462 GAL (SEE TABLE 3)
17. POWERHOUSE EQUIPMENT & STORAGE (VARIOUS EQUIPMENT STORAGE VESSELS PLUS DRUM STORAGE) - 1,725 GAL. TOTAL (SEE TABLE 4)
18. POWER TRAIN EQUIPMENT (VARIOUS EQUIPMENT VESSELS) - 71,973 GAL TOTAL (SEE TABLE 5)
19. POWER TRAIN STORAGE (VARIOUS STORAGE VESSELS) 12,375 GAL. TOTAL (SEE TABLE 6)
20. TWO SILICON DIELECTRIC OIL TRANSFORMERS - 19,000 GAL. TOTAL (SEE TABLE 2)
21. LOADING/UNLOADING SECONDARY CONTAINMENT - HAZARDOUS MATERIAL STORAGE BUILDING
22. LOADING/UNLOADING SECONDARY CONTAINMENT - WTP
23a,23b,23c. OIL/WATER SEPARATOR
24. 80 GAL. MOBILE FUEL TANK

SPILL RESPONSE EQUIPMENT AND LOCATIONS:

- [A] SPILL TRUCK WITH SPILL RESPONSE MATERIAL AND EQUIPMENT. THE SPILL TRUCK IS LOCATED AT COLUMN R-3.
- [B] CRIB #1 CONTAINS ABSORBENT SOCKS, MATTING, SHOVELS, BROOMS, SQUEEGEES, AND PERSONAL PROTECTIVE EQUIPMENT. CRIB #1 IS LOCATED AT COLUMN Q-7.
- [C] HAZARDOUS MATERIAL BUILDING - BROOMS, ABSORBENTS, AND OVERPACK DRUMS.
- [D] YELLOW BELLIED SUMP SUCKER - MAINTENANCE DEPT.
- [E] WTP - ABSORBENTS, PORTABLE PUMPS.
- [F] POWERTRAIN CRIB - ABSORBENT MATTING, BROOMS, SQUEEGEES, PPE.
- [G] SPILL KIT IN ENGINEERING DEPARTMENT VEHICLE (PASSENGER VAN).

NOTE:
OTHER PERSONAL PROTECTIVE EQUIPMENT (i.e. GLOVES, BOOTS, ETC.) IS LOCATED IN KEY PLANT AREAS SUCH AS WASTE TREATMENT PLANT (WTP).

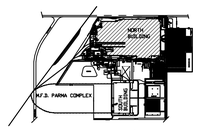


0 200 400 600 800
SCALE IN FEET

NOTES:

1. STORMWATER COLLECTED ON THE SOUTHERN AND NORTHEASTERN PORTION OF THE SITE DRAINS TO THE STORMWATER RETENTION POND, AND THEN TO THE NORTHEAST OHIO REGIONAL SEWER DISTRICT STORMWATER SYSTEM AFTER PASSING THROUGH THE OIL/WATER SEPARATOR.
2. STORMWATER COLLECTED ON THE NORTHWESTERN PORTION OF THE SITE DRAINS THROUGH THE OIL/WATER SEPARATOR AND THEN TO THE NORTHEAST OHIO REGIONAL SEWER DISTRICT STORMWATER SYSTEM.
3. DRAWING INCLUDES SITE STORM WATER IMPROVEMENTS FALL 2002.
4. DRAWING BASED ON DRAWING PROVIDED BY GM. (GENERAL SITE\SEWER PLAN PROVIDED BY O'BRIEN & GERE ENGINEERS, INC. DATED FEBRUARY 1997.)
5. DRAWINGS ALSO BASED ON DRAWINGS FROM DLZ CORPORATION, MARCH 2003.
6. LOCATIONS APPROXIMATE.
7. SEE TABLES 1 THROUGH 7 FOR TANK LOCATION DETAILS, CONTENTS, AND CAPACITY.
8. DETAILED PIPING SHOWN ON SEPARATE FACILITY DRAWINGS.

DATE	ISSUED FOR	PROJECT ARCH/ ENGR APPROVAL	DEPT. MGR/SUPR APPROVAL



SITE/BUILDING PLAN & NORTH ARROW

GM DISCLAIMER & TYPICAL NOTES

NO.	DATE	BY	PROJECT ARCH/ ENGR APPROVAL	DEPT. MGR/SUPR APPROVAL

REVISIONS

SUPPLIER PROJECT NO.	CERTIFIED BY
SUPPLIER DRAWN BY	
SUPPLIER CHECKED BY	
SUPPLIER PE/PM	

CONSULTANT A/E FIRM INFO & LOGO

GM
Worldwide Facilities Group
General Motors Corporation

GENERAL MOTORS CORPORATION
PARMA COMPLEX
CHEVROLET AND BROOKPARK ROADS
PARMA, OHIO

SPCC FACILITY DIAGRAM

JOB NUMBER	DRAWING SCALE
DRAWING LAST MODIFIED: JULY 2007	SHEET NUMBER: E-1
DRAWN BY: DAS	
CHECKED BY: PAB	
WFG PE/PM	

FILE PLOT DATE STAMP

G:\28777\200 SPCC REVISION\AUTOCAD DRAWINGS\RECORD_BASE1_R4.DWG

TABLE A-1

PROFESSIONAL ENGINEER'S RECOMMENDATIONS FOR SPCC

GM PARMA COMPLEX

Professional Engineer's Recommendations		
Date of Recommendation	**Description of Recommendation**	**Date Recommendation Completed**
The following actions are recommended for this plan and must be addressed within 6 months of certification of this plan, or the plan will become void of certification.		
23 April 2007	**GM Parma Complex**	
	Place signs that read, "Do not use" at oil tanks at columns S-67, R-65, and V-49.	
	Integrity inspections/Tank testing requirements are composed in SPCC Regulations, scheduled to become effective on July 1, 2009. The revised rule adds new requirements for periodic integrity testing of containers, and periodic integrity and leak testing of valves and piping. Consider industry standards such as API 653 and STI SP001. Consider "permanently closing" unused tanks which would remove closed tanks from SPCC requirements.	

Professional Engineer's Recommendations		
Date of Recommendation	**Description of Recommendation**	**Date Recommendation Completed**
The following actions are recommended for this plan and must be addressed within 6 months of certification of this plan, or the plan will become void of certification.		
23 April 2007	**GM Parma Complex**	

TABLE A-2

[40 CFR 112.5 (a) and (b)]

Review and Amendment Log

GM Parma Complex

Date of Review or Amendment	General Description of Changes Made (if any)	Page Numbers of Changes Made	Re-Certification by P.E. (yes/no)	Signature of Reviewer
If re-certification by P.E. is required, a new certification page (Section 1.1) must be completed and inserted into the plan.				

SPCC CHECKLIST

Yes	No	
☐	☐	Has there been any change (e.g., design, construction/demolition, operation, material type, material volume) that affects your facility's potential to discharge oil or other polluting substance into the waters of the United States during the previous twelve months? *[If yes, plan needs to be amended and recertified.]*
☐	☐	Has there been a change in personnel and/or phone numbers listed on the internal notification list? *[If yes, plan needs to be updated.]*
☐	☐	Have you inspected/inventoried spill response equipment as listed in the Spill Response section of this plan?
☐	☐	Do you have a current contract with an emergency response contractor who can remediate a worst case spill from your facility?
☐	☐	Have you reviewed this plan in detail prior to your signature on this page?
☐	☐	Has your facility experienced a reportable spill within the last twelve months?
☐	☐	If yes, was your spill plan utilized and effective? If you answer no to this question state what changes were made to eliminate the deficiency.
☐	☐	Has your facility had two reportable spill events within a twelve month period or one spill of 1000 gallons or more of oil into navigable waters?
☐	☐	If yes, did you submit your SPCC Plan within 60 days?
☐	☐	Does your plan conform to the content and format of the current version of the GM Standard Environmental Practice for SPCC Plans?

Comments:

Signature _____ Title _____ Date _____

SPCC CHECKLIST

Yes	No	
☐	☐	Has there been any change (e.g., design, construction/demolition, operation, material type, material volume) that affects your facility's potential to discharge oil or other polluting substance into the waters of the United States during the previous twelve months? *[If yes, plan needs to be amended and recertified.]*
☐	☐	Has there been a change in personnel and/or phone numbers listed on the internal notification list? *[If yes, plan needs to be updated.]*
☐	☐	Have you inspected/inventoried spill response equipment as listed in the Spill Response section of this plan?
☐	☐	Do you have a current contract with an emergency response contractor who can remediate a worst case spill from your facility?
☐	☐	Have you reviewed this plan in detail prior to your signature on this page?
☐	☐	Has your facility experienced a reportable spill within the last twelve months?
☐	☐	If yes, was your spill plan utilized and effective? If you answer no to this question state what changes were made to eliminate the deficiency.
☐	☐	Has your facility had two reportable spill events within a twelve month period or one spill of 1000 gallons or more of oil into navigable waters?
☐	☐	If yes, did you submit your SPCC Plan within 60 days?
☐	☐	Does your plan conform to the content and format of the current version of the GM Standard Environmental Practice for SPCC Plans?

Comments:

Signature _____ Title _____ Date _____

TABLE A-3

Monthly Inspection Checklist Summary

GM Parma Complex

Instructions: This inspection record will be completed every month for each storage unit identified in the Monthly Inspection Checklist Summary. There is no need to use a separate walk-around form for each storage unit. Use this form to identify the areas of each storage unit that must be examined during the walk-around. Make notes on this form during the walk-around and retain this form for the facility's files. Summarize your findings within the Monthly Inspection Checklist Summary and if necessary, further comments or descriptions should be attached on a separate sheet of paper if necessary.

Place an X in the appropriate box for each item. If any response requires elaboration, do so in the Description and Comments space provided.

REPORT ANY ISSUES OR PROBLEMS TO THE MAINTENANCE MANAGER IMMEDIATELY

	YES	NO	Description and Comments
Tote/tank surfaces show signs of leakage	☐	☐	_____
Tote/tanks are damaged, rusted or deteriorated	☐	☐	_____
Tote/tank bolts, rivets, or seams are damaged	☐	☐	_____
Tote/tank foundations have eroded or settled	☐	☐	_____
Tote/tank level gauges are inoperative	☐	☐	_____
Tote/tank vents are obstructed	☐	☐	_____
Tote/tank valve seals or gaskets are leaking	☐	☐	_____
Tote/tank pipelines or supports are damaged	☐	☐	_____

TABLE A-3

Monthly Inspection Checklist Summary

GM Parma Complex

	YES	NO	Description and Comments
Tote/Tank pumps are malfunctioning	☐	☐	_____
Containers are in poor condition or leaking	☐	☐	_____
Containers are open	☐	☐	_____

If equipment is working properly, NO is the correct answer. If a statement is answered with a YES, contact the Maintenance Manager immediately

Remarks: _____

_____

_____

_____

_____

_____

_____

_____

Signature: _____ Date: _____

Table A-4

STORAGE UNIT MONTHLY INSPECTION LOG

GM Parma Complex

Date (Mo/Yr)	Inspector Signature

Date (Mo/Yr)	Inspector Signature

GM MFD-PARMA

Pinkerton Security Department

WEEKEND / HOLIDAY SPILL AREA INSPECTION

DATE:_____ OFFICER'S NAME:_____ SUPERVISOR:_____

(print and initial)

LOCATION / DESCRIPTION	CHECK FOR CONDITIONS	OK *YES / NO*	COMMENTS / FOLLOW-UP
BROOKPARK RD SEWER OUTFALL TO CREEK	OIL SHEEN AND COLOR	YES / NO	
SKIMMER OUTFALL AT STORM RETENTION POND	OIL SHEEN AND COLOR	YES / NO	
ACID PIT OUTFALL TO RETENTION POND AT PUMP PLATFORM	OIL SHEEN AND COLOR	YES / NO	
DIESEL FUEL AND GAS TANKS AT HAZ. BLDG. AND PUMP HOUSE	SPILLS OR LEAKS	YES / NO	
PROCESS OIL TANKS AND PH BULK CHEMICAL TANKS	SPILLS OR LEAKS	YES / NO	
COOLING TOWERS AT MAIN PLANT AND SOUTH BUILDING	SPILLS OR LEAKS	YES / NO	
KEROSENE TANKS AT HAZ-MAT BLDG. AND SOUTH BLDG.	SPILLS OR LEAKS	YES / NO	
FIRE SCHOOL TANKS	SPILLS OR LEAKS	YES / NO	
PRESS STORAGE YARD AND BACK ROAD SCRAP YARD	SPILLS OR LEAKS	YES / NO	

EMERGENCY CONTACTS	PLANT PHONE EXT.	PAGER NUMBER	HOME PHONE NUMBER	NEXTEL
DIANE PALMER	5391	728-4648	(216)676-0104	92
BOB BOWSER	5390	728-3590	(330)650-4190	87
DAN HUBERT	5584 / 5596	(216) 589-4462		89
KEN KUKAROLA	5560	557-3386	(216) 225-0371	71

** ***FORWARD COMPLETED COPY TO ENVIRONMENTAL ENGINEERING DEPARTMENT***

Revised 04/2003

GM PARMA STORMWATER INSPECTION LOG

LOCATION	INSPECTED BY	DATE	TIME	WATER VISUAL INSPECTION	FLOW	COMMENTS
RETENTION POND						
RETENTION POND PUMPS						
H-100 LIFT STATION						
NPDES OUTFALL						
NPDES STORMWATER METER READINGS			WEST	EAST		
INSTANTANEOUS						
TOTALIZER						
WEATHER CONDITION						

GM PARMA SECONDARY CONTAINMENT FUEL TANKS INSPECTION LOG

TANK	INSPECTED BY	DATE	TIME	TANK CONDITION OK	WATER LEVEL	COMMENTS
DIESEL FUEL -- PH						
GASOLINE -- HAZ BLDG						
KEROSENE -- HAZ BLDG						
GASOLINE -- FIRE SCHOOL						
KEROSENE -- S. BLDG.						
GASOLINE -- JL ROBBINS						
DIESEL FUEL -- JL ROBBINS						

OIL TANK FARM WEEKLY INSPECTION LOG

DATE	INSPECTED BY	TANKS LEAKING?	PIPING LEAKING?	DIKE CONDITION	COMMENTS

Table A-8

SPILL HISTORY

GM Parma Complex

Reportable Spills And Leaks						
Instructions: Record all significant spills and leaks of toxic or hazardous pollutants that have occurred at the facility during the period covered by the SPCC plan. Significant spills include, but are not limited to, releases of oil or hazardous substances in excess of the reportable quantities.						
Date	Location	Description			Response Procedures	
		Type of Material	Quantity (units)	Source/Reason	Amount of Material Recovered (units)	Preventive Measures Taken

Cuyahoga County LEPC
Spill Incident Report

Company Name: GENERAL MOTORS PARMA PLANT Phone: 216-265-
Address: 5400 CHEVROLET BLVD
City: PARMA State: OH Zip Code: 44130
Name of Person Making Report: DIANE PALMER Phone: 216-265-5
Title: SR. ENV. ENG.
Facility Emergency Coordinator: DIANE PALMER Phone: 216-265-5
Title: SR. ENV. ENG
Incident Location and/or Address: 5400 CHEVROLET BLVD
City: PARMA County: CUYAHOGA Township:
Longitude: 81° 46' 15" Latitude: 41° 25' 6" or Coordinate Number:

TO BE COMPLETED BY LEPC:

Census Tract: Census Block: Incident Number:

ORGANIZATIONS NOTIFIED BY COMPANY, WTH DATE & TIME OF NOTIFICATION:

*Cuyahoga County LEPC	on 8/17/01	at 11:18	☒ a.m.	☐ p.m.
*Ohio SERC	on 8/17/01	at 11:14	☒ a.m.	☐ p.m.
*Fire Department	on 8/17/01	at 11:55	☒ a.m.	☐ p.m.
NEORSD or Sewer Dept.	on 8/17/01	at 11:39	☒ a.m.	☐ p.m.
*National Response Center	on 8/17/01	at 11:28	☒ a.m.	☐ p.m.
Police Department	on	at	☐ a.m.	☐ p.m.
Other	on	at	☐ a.m.	☐ p.m.

Responding Agencies: FIRE DEPT. NEORSD

If Company failed to notify the above 4 (*) Agencies, who did?

Name/Title of Company Official that was first aware of the Release: DIANE PALMER SR. ENV. ENG. Date: 8/17/01 Time: 10:55 A

Date and Time of Incident: 8/17/01 10:55 AM When Discovered: 8/17/01 10:55AM
OEPA Incident Number: 0108-18-3088 NRC Incident Number: 576-8410
Chemical Name(s). Attach Sheet(s) for Additional Information if needed:

A.	WASTE OIL	CAS #	NA	Qty. in lbs.	< 8
B.		CAS #		Qty. in lbs.	
C.		CAS #		Qty. in lbs.	

RQ EHS ☒ No ☐ Yes
RQ CERCLA ☒ No ☐ Yes
RQ OIL ☐ No ☒ Yes
RQ CAA ☒ No ☐ Yes
Other

CHOOSE DOT CLASSIFICATION(S):

☐ Class 1- Explosives
☐ Class 2- Gases
☐ Class 3- Flammable liquids
☐ Class 4- Flammable Solids
☐ Class 5-Oxidizers
☐ Class 6-Toxic Materials
☐ Class 7-Radioactive Materials
☐ Class 8- Corrosive Materials
☐ Class 9-Misc. Dangerous Goods

DURATION OF RELEASE:

Date: 8/17/01 CONTAINED "SLUG"
Start Time: 10:55 End Time: 1:00 PM
Total Duration Hours: 2 Minutes: 5

PHYSICAL STATE:

☐ Solid
☒ Liquid
☐ Gas

MSDS AVAILABLE:

☒ No
☐ Yes

CHOOSE RESPONSE ACTIONS TAKEN:

- [x] Containment (Amt.) < 1 GAL
- [ ] Dilution/Neutralization (Amt.) _____
- [x] Hazard Removal
- [ ] Decontamination of Persons/Equipment
- [ ] Evacuation
- [ ] Diversion of Release to Treatment
- [ ] System Shut Down
- [ ] Monitoring (Type) _____
- [ ] Other _____

DESCRIBE ACTION TAKEN: OIL SLUG WAS CONTAINED BY BOOM. CONT. OIL WAS REMOVED BY VACUUM TRUCK AND DISPOSED AT ON SITE

AMOUNT WASTE RECOVERED: < 1 GAL [x] Gallons [ ] Pounds

CLEAN-UP WASTE DESTINATION: ON-SITE WASTE TREATMENT PLANT

TSDF NAME: NA

ADDRESS: NA

NUMBER OF INJURIES:

Emergency Responders 0 Facility Employee 0 Other 0

NUMBER OF FATALITIES:

Emergency Responders 0 Facility Employee 0 Other 0

TYPE OF EXPOSURE:	NO	YES
1. Inhalation	[x]	[ ]
2. Skin Contact	[x]	[ ]
3. Eye Contact	[x]	[ ]
4. Ingestion	[x]	[ ]
5. Injection	[x]	[ ]
6. Other Symptoms	[x]	[ ]

POTENTIAL HEALTH AFFECTS (CITE SOURCE)

1. Acute: _____
2. Chronic: _____

Describe: _____

Advice Regarding Medical Attention of Exposed Individuals: _____

EVACUATION: [x] No [ ] Yes # of Evacuees _____

Type of Evacuation: [ ] Facility [ ] Community [ ] Exposed Business

Approximate Area Evacuated (Attach map if needed) _____

INCIDENT/CONSEQUENCES:

1. Spill: [ ] No [x] Yes How Detected? OBSERVED
2. Fire: [x] No [ ] Yes How Detected? _____
3. Explosion: [x] No [ ] Yes
4. Vapor Gas Dispersion to Air off site: [x] No [ ] Yes Distance _____
5. Vapor Gas Dispersion Confined to Structure: [x] No [ ] Yes
6. Material entered Waterway: [ ] No [x] Yes Storm Sewer: [ ] No [x] Yes

   If Yes, Downstream Distance NA Name _____
7. Material Entered Sanitary Sewer: [x] No [ ] Yes
8. Material on Land: [x] No [ ] Yes

   Surface Area & Depth of Soil Contamination: _____
9. Public Warning Issued [x] No [ ] Yes How? _____
10. Any Off-site Monitoring Conducted? [x] No [ ] Yes-Describe How Monitored and Concentration: _____
11. Other _____

ESTIMATED COSTS:

1. Product Loss 0
2. Facility or Carrier 0
3. Public/Private Property 0
4. Environmental 0
5. Remediation Costs $500
6. Other

TOTAL ESTIMATED COST: $500

CHOOSE WEATHER CONDITIONS:

Type of Cloud Cover: ☐ Sunny ☒ Partial Cloudy ☐ Overcast

Wind Direction: _____ Speed: _____ How Determined? _____

Relative Humidity: _____ Temperature: ~75°F

Precipitation: ☐ Rain ☐ Snow ☐ Sleet ☐ Hail

Other _____

CHOOSE LAND USE TYPES:

☒ Industrial ☐ Residential ☐ Undeveloped

☐ Commercial ☐ Agricultural

VEHICLE ACCIDENT: ☒ No ☐ Yes

TYPE OF INCIDENT:

☒ Facility ☐ Transportation

IF FACILITY:

Choose Factors Contributing to Release (explain if necessary):

☐ Equipment Failure _____

☐ Operator Error _____

☐ Process Design Problem _____

☐ Personnel Competence (Insufficient Training) _____

☐ Unusual Weather Conditions _____

☒ Other UNKNOWN SOURCE

DESCRIBE THE ACTION TAKEN BY FACILITY, PRIOR TO ARRIVAL OF EMERGENCY RESPONDERS:

OIL SLUG WAS CONTAINED BY FACILITIES BOOMS

CHOOSE FACILITY ACTIVITY CONTRIBUTING TO RELEASE (explain if necessary):

☐ Container/Handling _____

☐ Piping _____

☐ Blending/Mixing _____

☐ Storage _____

☐ Loading/Off Loading _____

☐ Product Transfer _____

☒ Other UNKNOWN SOURCE

Describe Source of Release (i.e., flange, valve, etc.): UNKNOWN

IF TRANSPORTATION-Choose Type of Vehicles:

☐ Aircraft	☐ Flat Bed Truck/Trailer	☐ Tank Car
☐ Barge	☐ Rail Car	☐ Van Truck/Trailer
☐ Cargo Tank	☐ Ship	☐ Other _____

EQUIPMENT MANUFACTURER: _____

Year: _____

CHOOSE TRANSPORTATION PHASE DURING WHICH INCIDENT OCCURRED:

☐ En Route ☐ Loading ☐ Unloading ☐ Temporary Storage Terminal

Distance and Direction from Nearest Intersection (attach a map): _____

TRANSPORTATION:

☐ Shipper: _____
☐ Carrier: _____
☐ Cosignee: _____
☐ Designation: _____
☐ Road Conditions: _____

PROVIDE SUMMARY OF ACTIONS TAKEN TO PREVENT A RECURRENCE OF THE RELEASE:

OIL BOOMS ARE REGULARLY IN PLACE AT THE OUTFALL AND ARE BEING REGULARLY CHECKED AND REPLACED AS NEEDED. THESE BOOMS PREVENTED A RELEASE OF THIS MATERIAL TO THE STREAM.

LIST ANY INCIDENT RELATED AIR, WATER OR OTHER PERMIT NUMBER:

NPDES 3150043**CD

CHRONOLOGICAL REVIEW OF THE INCIDENT. ATTACH ANY OTHER DOCUMENT WHICH MAY BE APPROPRIATE:

8-17-01

10:55 AM DIANE PALMER NOTIFIED OF OIL AT BOOM AT STORMWATER OUTFALL

11:05 AM DIANE PALMER CALLED INLAND WATERS FOR VACUUM TRUCK

11:14 AM DIANE PALMER NOTIFIED OHIO SERC

11:18 AM DIANE PALMER NOTIFIED LEPC

11:28 AM DIANE PALMER NOTIFIED NRC

11:39 AM DIANE PALMER NOTIFIED NEORSD

11:55 AM DIANE PALMER RETURNED PAGE TO PARMA FIRE DEPT, TOLD THEM NOT TO SEND TRUCK

12:10 PM PARMA FIRE DEPT AND NEORSD CAME OUT, LOOKED AT CREEK AND LEFT

12:30 PM INLAND WATERS VACUUM TRUCK ARRIVES AND VACUUMS UP OIL. REPLACED BOOM

1:00 PM OUTFALL IS CLEAR

GM Environmental Spill/Release Tracking Form

PRIVILEGED AND CONFIDENTIAL
ATTORNEY CLIENT COMMUNICATION

WFG Region OHIO Division
Plant Name MFD PARMA Plant Address 5400 CHEVROLET BLVD
Reported to the agencies by DIANE PALMER Report Date/Time
Title SR. ENV. ENG. Phone Number 216-265-5391
Plant Response Personnel Contacted
NONE - OUTSIDE CONTRACTOR
Form Submitted by: DIANE PALMER

Incident Description

Date of incident 8/17/01 **Time** 10:55 (am)/pm Released during Production hours yes /no / unknown

Location of Incident (be specific) Bldg (#, name) NA Floor NA Bay/Dock # NA

Released offsite (be specific) NPDES OUTFALL

Was the release to LAND AIR WATER X

Material OIL **FID#** NA **WC#** (Canada only)

DISCOVERED 10:55 AM
Duration of Release (minutes, hours, days, etc) CLEANED BY 1:00 PM **Total amount spilled/released** < 1 GAL

How was the release discovered? REPORTED TO DIANE PALMER BY PIPEFITTER

Boxed Area to be completed by US Facilities

RQ Substance OIL CAS # NA **# of RQ substance released** SHEEN **Exceeded RQ ?** yes

Was the release from a permitted source? (yes) no Exceed permit (yes) no Exceed permit by RQ? yes no

US EPA ID # OHD086663101

Receiving body of water (stream, river, watershed, etc.) TRIBUTARY TO WEST BRANCH OF BIG CREEK

Describe the event (include equipment and other details) SLUG OF OIL DISCOVERED AT OUTFALL. CONTAINED BY BOOMS. CALLED IN CONTRACTOR TO CLEAN-UP W/ VACUUM TRUCK. NOTIFIED AGENCIES

Describe Weather Conditions (precipitation, wind, temp. etc.) PARTLY CLOUDY ~75°F LOW WIND

Spill/Release reached (check all that apply)

1) Storm Sewer GM X NonGM
2) Surface Water GM X NonGM
3) Sanitary Sewer GM NonGM
4) Combined Sewer GM NonGM
5) Publicly Owned Treatment Works:
6) Groundwater
7) Soil
8) Industrial Wastewater Treatment Plant
9) Ambient Air
10) Other:

Bold Items –Required Information for Agency Reports
Supplement this report as new information arises.

August 23, 2001

Ohio EPA
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087

Re: Reporting Incident No. 0108-18-3088

Dear Sir/Madam:

This letter is intended to confirm the verbal notification regarding General Motors NPDES outfall No. 3IS00043**CD, (001), that was made to Mr. Todd Taylor on Friday, August 17, 2001 at about 11:14 AM. Diane Palmer, Senior Environmental Engineer at the General Motors MFD Plant in Parma, Ohio reported a contained oil "slug" at outfall 001. GM also notified the NRC (incident #576-8410), LEPC and the local sewer district.

Under Permit Item 12C, the following additional information is provided:

1. Limit which may have been exceeded.

   Part III – General Conditions Section 2.(B) regarding the effluent not to contain "noticeable accumulations of scum, foam or sheen.

2. The extent of the exceedance.

   Outfall 001. The outfall area was controlled by in place floating booms that contained the release. It is estimated that less than one gallon of oil was accumulated.

3. Cause of the exceedance.

   The Parma Plant has investigated this matter, including examining outside storage pads and storm water systems and no apparent source was found. We suspect it came from accumulations from unknown sources during dry weather conditions that were washed through during the last rainfall.

4. Period of the exceedance.

The slug of oil and the upstream storm water separator and sewer systems were cleaned up by 1:00 PM and oily wastewater was treated on-site that same day.

5. Anticipated time exceedance will continue.

N/A

6. Steps to reduce or prevent recurrence.

Oil booms are regularly in place at the outfall and are being regularly checked and replaced as needed. These booms prevented the release of this material to the stream.

If you have any questions regarding the above, please contact Diane Palmer at (216) 265-5391 or Bob Bowser at (216) 265-5390.

Pursuant to the 40 CFR 122.22 certification requirement:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Elmer F. Tyler
Plant Manager

cc: LEPC
Richard Connelly, NEORSD
Ms. Johnson, NRC

bcc: Laura Romeo
Gary Stahle
Bob Bowser
Skip Maag
Elmer Tyler
Bob Hare

March 9, 2001

Verneta Simon
USEPA Region V
77 West Jackson Blvd.
Chicago, IL 60604

Re: Reporting Incident No. 5558952

Dear Ms. Simon:

On Thursday, March 8, 2001 at 2:05 p.m., Diane Palmer, Senior Environmental Engineer at the General Motors MFD Plant in Parma, Ohio reported (Incident No. 5558952) an oil sheen at our N.P.D.E.S. outfall 001 (OEPA Permit Number 3IS00043*CD) that had occurred on February 8, 2001. The Northeast Ohio Regional Sewer District, Cuyahoga County Local Emergency Planning Committee and State Emergency Response Center (Report #0201-18-0422) were verbally notified on February 8, 2001 and provided with a written follow-up notification letter on February 15, 2001 (copy attached). In addition, the Parma Plant subsequently completed a Spill Incident Report form for the Cuyahoga County LEPC (copy attached). The Parma Plant has been actively involved with Mr. Reggie Brown of the OEPA regarding this matter, including the investigation and corrective measures implemented.

In addition, for your information, on December 6, 1999, the Parma Plant also verbally notified the State Emergency Response Center (Incident No. 9912-18-4221) and the OEPA Northeast District Office regarding a release of oil into a sewer catch basin and provided a written follow-up notification letter on December 9, 1999 (copy attached). That incident was addressed on December 6, 1999. Samples taken on December 12, 1999 were below the permit limit.

If you have any questions, please contact Diane Palmer at 216-265-5391.

Sincerely,

William Kulhanek
Acting Plant Manager

C: Ms. Jones – National Response Center
Enc.

February 15, 2001

Ohio EPA
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087

Re: Reporting Incident No. 0102-18-0422

Dear Sir/Madam:

This letter is intended to confirm the verbal notification regarding General Motors' NPDES listed outfall No. 3IS00043**CD, (001), that was made to Mr. Todd Taylor on Thursday, February 8, 2001 at about 2:10 PM. Diane Palmer, Senior Environmental Engineer at the General Motors MFD Plant in Parma, Ohio reported an oil sheen at outfall 001. The Parma Plant has had several discussions with Mr. Reggie Brown of the OEPA regarding this matter, including regarding investigation and interim steps to implement.

Under Permit Item 12C:

1. Limit which may have been exceeded.

Visible oil sheen. Upon discovery of the sheen, the Parma Plant had a sample taken of the discharge at the outfall. The results are non-detect for oil and grease.

2. The extent of the exceedance.

Outfall 001. (unnamed tributary to west branch of Big Creek)

3. Cause of the exceedance.

The Parma Plant has been vigorously investigating this matter, including examining outside storage pads and storm water systems. The source has

not yet been identified and we are actively pursuing this matter. In addition, as described under item 6, the Parma Plant is taking interim steps to address this matter.

4. Period of the exceedance.

Continuing.

5. Anticipated time exceedance will continue.

Unknown at this time.

6. Steps to reduce or prevent recurrance.

Oil booms are regularly in place at the outfall. Based on this matter, and as part of the Parma Plant's discussions with Mr. Brown, additional booms have been placed at the outfall and are being regularly checked and replaced as needed. The API separator at the storm water reservoir was routinely cleaned on January 26, 2001. After the sheen was noticed, the API separator has been cleaned on February 8, 9, 12 and 13, 2001. The Parma Plant will continue to clean the API separator as needed.

If you have any questions regarding the above, please contact Diane Palmer at (216) 265-5391 or Bob Bowser at (216) 265-5390.

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

FOR E. TYLER

Elmer F. Tyler
Plant Manager

cc: LEPC
Richard Connelly, NEORSD

Cuyahoga County LEPC
Spill Incident Report

Company Name: GENERAL MOTORS CORPORATION MFD PARMA PLANT Phone: 216-265-
Address: 5400 CHEVROLET BLVD
City: PARMA State: OH Zip Code: 44130
Name of Person Making Report: DIANE PALMER Phone: 216-265-
Title: SR. ENV. ENG
Facility Emergency Coordinator: DIANE PALMER Phone: 216-265-
Title: SR. ENV. ENG.
Incident Location and/or Address: 5400 CHEVROLET BLVD
City: PARMA County: CUYAHOGA Township:
Longitude: 81° 46' 15" Latitude: 41° 25' 6" or Coordinate Number:

TO BE COMPLETED BY LEPC:

Census Tract: Census Block: Incident Number:

ORGANIZATIONS NOTIFIED BY COMPANY, WTH DATE & TIME OF NOTIFICATION

*Cuyahoga County LEPC	on	2/8/01	at	2:20	☐ a.m.	☒ p.m.
*Ohio SERC	on	2/8/01	at	2:10	☐ a.m.	☒ p.m.
*Fire Department	on		at		☐ a.m.	☐ p.m.
NEORSD or Sewer Dept.	on	2/8/01	at	2:25	☐ a.m.	☒ p.m.
*National Response Center	on	3/8/01	at	2:05	☐ a.m.	☒ p.m.
Police Department	on		at		☐ a.m.	☐ p.m.
Other	on		at		☐ a.m.	☐ p.m.

Responding Agencies: OHIO EPA

If Company failed to notify the above 4 (*) Agencies, who did?

Name/Title of Company Official that was first aware of the Release: DIANE PALMER SR. ENV. ENG. Date: 2/8/01 Time: ~1:30 PM

Date and Time of Incident: 2/8/01 1:30 PM When Discovered: 2/8/01 1:30 P
OEPA Incident Number: 0102-18-0422 NRC Incident Number: 5558952
Chemical Name(s). Attach Sheet(s) for Additional Information if needed:
A. OIL SHEEN CAS # Qty. in lbs.
B. CAS # Qty. in lbs.
C. CAS # Qty. in lbs.

RQ EHS ☒ No ☐ Yes
RQ CERCLA ☒ No ☐ Yes
RQ OIL ☐ No ☒ Yes
RQ CAA ☒ No ☐ Yes
Other

CHOOSE DOT CLASSIFICATION(S):
☐ Class 1- Explosives
☐ Class 2- Gases
☐ Class 3- Flammable liquids
☐ Class 4- Flammable Solids
☐ Class 5-Oxidizers
☐ Class 6-Toxic Materials
☐ Class 7-Radioactive Materials
☐ Class 8- Corrosive Materials
☐ Class 9-Misc. Dangerous Goo

DURATION OF RELEASE:
Date: 2/8/01 - 2/19/01 SPORADIC
Start Time: End Time:
Total Duration Hours: Minutes:

PHYSICAL STATE:
☐ Solid
☒ Liquid
☐ Gas

MSDS AVAILABLE:
☐ No
☐ Yes

*REFER TO SOURCES AND DATES DISCUSSED IN CHRONOLOGICAL REVIEW

CHOOSE RESPONSE ACTIONS TAKEN:

- [x] Containment (Amt.) Boom
- [ ] Dilution/Neutralization (Amt.) _____
- [ ] Hazard Removal
- [ ] Decontamination of Persons/Equipment
- [ ] Evacuation
- [x] Diversion of Release to Treatment
- [ ] System Shut Down
- [ ] Monitoring (Type) _____
- [ ] Other _____

DESCRIBE ACTION TAKEN: ADDITIONAL OIL ABSORBENT BOOMS PUT INTO CREEK. VACUUM TRUCK CLEANED OUT OIL API SEPARATO TREATED AT WASTE TREATMENT PLANT

AMOUNT WASTE RECOVERED: SHEEN ☐ Gallons ☐ Pounds

CLEAN-UP WASTE DESTINATION: BOOMS DISPOSED WITH PLANT'S OIL ABSORBENT WASTE

TSDF NAME: ECDC ENVIRONMENTAL

ADDRESS: 1111 W. HIGHWAY 123, EAST CARBON, UTAH

NUMBER OF INJURIES:

Emergency Responders 0 Facility Employee 0 Other 0

NUMBER OF FATALITIES:

Emergency Responders 0 Facility Employee 0 Other 0

TYPE OF EXPOSURE:	NO	YES
1. Inhalation	☒	☐
2. Skin Contact	☒	☐
3. Eye Contact	☒	☐
4. Ingestion	☒	☐
5. Injection	☒	☐
6. Other Symptoms	☒	☐

POTENTIAL HEALTH AFFECTS (CITE SOURCE)

1. Acute: _____
2. Chronic: _____

Describe: _____

Advice Regarding Medical Attention of Exposed Individuals: _____

EVACUATION: ☒ No ☐ Yes # of Evacuees _____

Type of Evacuation: ☐ Facility ☐ Community ☐ Exposed Business

Approximate Area Evacuated (Attach map if needed) _____

INCIDENT/CONSEQUENCES:

1. Spill: ☒ No ☐ Yes How Detected? _____
2. Fire: ☒ No ☐ Yes How Detected? _____
3. Explosion: ☒ No ☐ Yes
4. Vapor Gas Dispersion to Air off site: ☒ No ☐ Yes Distance _____
5. Vapor Gas Dispersion Confined to Structure: ☐ No ☐ Yes
6. Material entered Waterway: ☐ No ☒ Yes Storm Sewer: ☐ No ☒ Yes
   If Yes, Downstream Distance _____ Name UNNAMED TRIBUTARY TO L BRANCH OF BIG CREEK
7. Material Entered Sanitary Sewer: ☒ No ☐ Yes
8. Material on Land: ☒ No ☐ Yes
   Surface Area & Depth of Soil Contamination: _____
9. Public Warning Issued ☒ No ☐ Yes How? _____
10. Any Off-site Monitoring Conducted? ☐ No ☒ Yes-Describe How Monitored and Concentration: VISUALLY INSPECTED DOWNSTREAM - SPORADIC TRACES OF SHEEN
11. Other _____

ESTIMATED COSTS:

1. Product Loss 0
2. Facility or Carrier NA
3. Public/Private Property 0
4. Environmental SEWER CAMERA + SEWER JETTING $15,000
5. Remediation Costs BOOMS - $1000 VACUUM TRUCKS - $9000
6. Other 0

TOTAL ESTIMATED COST: $25000

CHOOSE WEATHER CONDITIONS:

Type of Cloud Cover: ☐ Sunny ☒ Partial Cloudy ☐ Overcast
Wind Direction: _____ Speed: _____ How Determined? _____
Relative Humidity: _____ Temperature: _____
Precipitation: ☐ Rain ☐ Snow ☐ Sleet ☐ Hail
Other _____

CHOOSE LAND USE TYPES:

☒ Industrial ☐ Residential ☐ Undeveloped
☐ Commercial ☐ Agricultural
PLANT PROPERTY AND OUTFALL 001

VEHICLE ACCIDENT:

☒ No ☐ Yes

TYPE OF INCIDENT:

☒ Facility ☐ Transportation

IF FACILITY:

Choose Factors Contributing to Release (explain if necessary):

☐ Equipment Failure _____
☐ Operator Error _____
☐ Process Design Problem _____
☐ Personnel Competence (Insufficient Training) _____
☒ Unusual Weather Conditions SNOW MELT - PARKING LOTS
☒ Other BREACH IN STORMWATER SUMPS

DESCRIBE THE ACTION TAKEN BY FACILITY, PRIOR TO ARRIVAL OF EMERGENCY RESPONDERS:

ADDITIONAL BOOMS PUT INTO CREEK. BOOMS PREVIOUSLY IN PLACE WERE CONTAINING SHEEN. VACUUM TRUCK CLEANED OUT OIL API SEPARATOR UPSTREAM OF DISCHARGE POINT. NO RESPONSE BY EMERGENCY RESPONDERS (CITY OR COUNTY)

CHOOSE FACILITY ACTIVITY CONTRIBUTING TO RELEASE (explain if necessary):

☐ Container/Handling _____
☐ Piping _____
☐ Blending/Mixing _____
☐ Storage _____
☐ Loading/Off Loading _____
☐ Product Transfer _____
☒ Other SCRAP METAL HANDLING

Describe Source of Release (i.e., flange, valve, etc.): 1. BOLT MISSING ON STORM SUMP COVER PLATE IN SCRAP PIT 2. BREACH IN CONCRETE STORM WATER SUMP IN SCRAP BALER BLDG. 3. SNOW MELT RUNOFF

IF TRANSPORTATION-Choose Type of Vehicles:

- ☐ Aircraft
- ☐ Barge
- ☐ Cargo Tank
- ☐ Flat Bed Truck/Trailer
- ☐ Rail Car
- ☐ Ship
- ☐ Tank Car
- ☐ Van Truck/Trailer
- ☐ Other _____

EQUIPMENT MANUFACTURER: _____

Year: _____

CHOOSE TRANSPORTATION PHASE DURING WHICH INCIDENT OCCURRED:

☐ En Route ☐ Loading ☐ Unloading ☐ Temporary Storage Terminal

Distance and Direction from Nearest Intersection (attach a map): _____

TRANSPORTATION:

- ☐ Shipper: _____
- ☐ Carrier: _____
- ☐ Cosignee: _____
- ☐ Designation: _____
- ☐ Road Conditions: _____

PROVIDE SUMMARY OF ACTIONS TAKEN TO PREVENT A RECURRENCE OF THE RELEASE:

COVER PLATE WAS REPLACED ON STORMWATER BUMP PUMP IN SCRAP PIT AND PUMP CONTROL PANEL WAS RE-MARKED TO ENHANCE IDENTIFICATION THAT PUMPS PUMP TO CREEK.

STORMWATER SUMP PUMPS IN SCRAP BALER PIT HAVE BEEN LOCKED OUT AND WATER IS BEING REMOVED BY VACUUM TRUCK AS NEEDED. STORM SUMP IS BEING RE-ENGINEERED TO COMBINE WITH INDUSTRIAL WASTE SUMP WHICH WILL BE SENT TO WASTE TREATMENT PLANT.

LIST ANY INCIDENT RELATED AIR, WATER OR OTHER PERMIT NUMBER:

NPDES OEPA 3IS.00043*CD

CHRONOLOGICAL REVIEW OF THE INCIDENT. ATTACH ANY OTHER DOCUMENT WHICH MAY BE APPROPRIATE:

2/8/01 DISCOVERED OIL SHEEN AT OUTFALL
2/8/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/8/01 ADDITIONAL OIL BOOM PUT IN PLACE
2/9/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/9 TO 2/15 INVESTIGATION OF SITE FOR OIL SHEEN SOURCE
2/12/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/13/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/16/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/17/01 SEWER CAMERA TRUCK INSPECTED SEWERS
2/17/01 DISCOVERED MISSING PLATE ON PIT SUMP
2/17/01 PUMPED OUT PIT SUMP WITH VACUUM TRUCK & REPAIRED PLATE
2/19/01 DISCOVERED BREACH IN SCRAP BALER SUMP PIT - LOCKED OUT PUMPS
2/19/01 VACUUMED OUT SUMP AND API OIL SEPARATOR
SINCE 2/8/01:
OIL BOOMS INSPECTED DAILY. MATERIAL BUILD UP BEHIND BOOMS MANUALLY REMOVED AS NEEDED. IN ADDITION FOLLOW UP INVESTIGATION AND RE-ENGINEERIN IS CONTINUING AS PREVIOUSLY DESCRIBED.

OIL & GREASE SAMPLES TAKEN AT OUTFALL ON 2/8, 2/15 & 2/16 WERE ALL NON-DETECT @ 10 mg/l DETECTION LEVEL.

December 9, 1999

Mr. Jim Irwin
Ohio EPA
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087

Re: Reporting Incident No. 9912-18-4221

Dear Mr. Irwin:

This letter is intended to confirm the verbal notification regarding General Motors' NPDES listed outfall No. 3IS00043 , that was made on Monday, December 6, 1999 at about 11:30 AM. Diane Palmer, Senior Environmental Engineer at the General Motors Plant in Parma, Ohio reported a release of oil contaminated material into a storm sewer catch basin. This sewer eventually flows to N.P.D.E.S. outfall 001 (OH0002275)(OEPA Permit No. 3IS00043*CD). This notification was made as required under Section 12B of this permit for potential noncompliance these observed circumstances may have caused.

Under Permit Item 12C:
1. Limit which may have been exceeded.

It was observed that there was a sheen on the outfall that may have been due to the material contaminated with oil entering the storm water catch basin.

2. The extent of the exceedance.

It was earlier in the morning on Monday December 6 when the discharge from a sump pump storm water was observed to be pumping the oil contaminated material from a pit excavation inside the plant to the catch basin. At 9:45 a.m. on December 6, 1999 an employee noticed the water pumping out had turned brown colored. He immediately had the pump shut off.

A check of the outfall at about 10:00 AM did not show any indication that the material had reached the creek, however there was a slight oil sheen. There was also a sheen on the W. 130th St. outfall sewer and the twin arches sewer that converge with our NPDES outfall.

A vacuum truck was brought in and we did collect a slug of oil contaminated material from the catch basin and sewer and removed it to our on-site waste water treatment system. The oil boom in place had apparently prevented any major oil from reaching the creek. Fresh booms were put in place following the sewer cleaning that afternoon.

The discharge of this sheen is prohibited under Section 2-B of the above permit.

3. Cause of the exceedance.

The discharge of stormwater from the excavation was undertaken after the inspection of the area revealed no visible signs of contamination or staining and the discharge was clear water. The oil-contaminated material is not readily known, from our experience, and inspection of the excavation following the incident has not resulted in an obvious source.

We are visually monitoring these activities more frequently and in the future the storm water from the pit excavations will be sent to our wastewater treatment plant.

4. Period of the Exceedance.

The oil sheen observed on the NPDES Outfall was gone by mid afternoon on Monday December 6 and fresh booms were in place. The time that the sump pump began removing the oil-contaminated material is not known.

5. Anticipated Time Exceedance will continue.

Not Applicable

6. Steps to Reduce or Prevent Occurrence

In the future the stormwater from any excavations will be pumped to our on-site wastewater treatment plant and these operations will be closely observed.

If you have any questions regarding the above, please contact Diane Palmer at (216) 265-5391.

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

W. D. Bartlett (ACTING PLANT MANAGER)

for Elmer F. Tyler
Plant Manager

Cuyahoga County LEPC
Spill Incident Report

MHILEY 3/9/01

Company Name: GENERAL MOTORS CORPORATION MFD PARMA PLANT Phone: 216-265-50
Address: 5400 CHEVROLET BLVD
City: PARMA State: OH Zip Code: 44130
Name of Person Making Report: DIANE PALMER Phone: 216-265-53
Title: SR. ENV. ENG
Facility Emergency Coordinator: DIANE PALMER Phone: 216-265-53
Title: SR. ENV. ENG.
Incident Location and/or Address: 5400 CHEVROLET BLVD
City: PARMA County: CUYAHOGA Township:
Longitude: 81° 46' 15" Latitude: 41° 25' 6" or Coordinate Number:

TO BE COMPLETED BY LEPC:

Census Tract: Census Block: Incident Number:

ORGANIZATIONS NOTIFIED BY COMPANY, WTH DATE & TIME OF NOTIFICATION:

*Cuyahoga County LEPC	on 2/8/01	at 2:20	☐ a.m.	☒ p.m.
*Ohio SERC	on 2/8/01	at 2:10	☐ a.m.	☒ p.m.
*Fire Department	on	at	☐ a.m.	☐ p.m.
NEORSD or Sewer Dept.	on 2/8/01	at 2:25	☐ a.m.	☒ p.m.
*National Response Center	on 3/8/01	at 2:05	☐ a.m.	☒ p.m.
Police Department	on	at	☐ a.m.	☐ p.m.
Other	on	at	☐ a.m.	☐ p.m.

Responding Agencies: OHIO EPA

If Company failed to notify the above 4 (*) Agencies, who did?

Name/Title of Company Official that was first aware of the Release: DIANE PALMER SR. ENV. ENG. Date: 2/8/01 Time: ~1:30 PM

Date and Time of Incident: 2/8/01 1:30 PM When Discovered: 2/8/01 1:30 PM
OEPA Incident Number: 0102-18-0422 NRC Incident Number: 5558952
Chemical Name(s). Attach Sheet(s) for Additional Information if needed:
A. OIL SHEEN CAS # Qty. in lbs.
B. CAS # Qty. in lbs.
C. CAS # Qty. in lbs.

RQ EHS ☒ No ☐ Yes
RQ CERCLA ☒ No ☐ Yes
RQ OIL ☐ No ☒ Yes
RQ CAA ☒ No ☐ Yes
Other

CHOOSE DOT CLASSIFICATION(S):
☐ Class 1- Explosives
☐ Class 2- Gases
☐ Class 3- Flammable liquids
☐ Class 4- Flammable Solids
☐ Class 5-Oxidizers
☐ Class 6-Toxic Materials
☐ Class 7-Radioactive Materials
☐ Class 8- Corrosive Materials
☐ Class 9-Misc. Dangerous Goods

DURATION OF RELEASE:
Date: 2/8/01 - 2/19/01 SPORADIC
Start Time: End Time:
Total Duration Hours: Minutes:

PHYSICAL STATE:
☐ Solid
☒ Liquid
☐ Gas

MSDS AVAILABLE:
☐ No
☐ Yes

*REFER TO SOURCES AND DATES DISCUSSED IN CHRONOLOGICAL REVIEW

CHOOSE RESPONSE ACTIONS TAKEN:

- [x] Containment (Amt.) Boom
- [ ] Dilution/Neutralization (Amt.) _____
- [ ] Hazard Removal
- [ ] Decontamination of Persons/Equipment
- [ ] Evacuation
- [x] Diversion of Release to Treatment
- [ ] System Shut Down
- [ ] Monitoring (Type) _____
- [ ] Other _____

DESCRIBE ACTION TAKEN: ADDITIONAL OIL ABSORBENT BOOMS PUT INTO CREEK. VACUUM TRUCK CLEANED OUT OIL API SEPARATO TREATED AT WASTE TREATMENT PLANT

AMOUNT WASTE RECOVERED: SHEEN ☐ Gallons ☐ Pounds

CLEAN-UP WASTE DESTINATION: BOOMS DISPOSED WITH PLANT'S OIL ABSORBENT WASTE

TSDF NAME: ECDC ENVIRONMENTAL

ADDRESS: 1111 W. HIGHWAY 123, EAST CARBON, UTAH

NUMBER OF INJURIES:

Emergency Responders 0 Facility Employee 0 Other 0

NUMBER OF FATALITIES:

Emergency Responders 0 Facility Employee 0 Other 0

TYPE OF EXPOSURE:	NO	YES
1. Inhalation	☒	☐
2. Skin Contact	☒	☐
3. Eye Contact	☒	☐
4. Ingestion	☒	☐
5. Injection	☒	☐
6. Other Symptoms	☒	☐

POTENTIAL HEALTH AFFECTS (CITE SOURCE)

1. Acute: _____

2. Chronic: _____

Describe: _____

Advice Regarding Medical Attention of Exposed Individuals: _____

EVACUATION: ☒ No ☐ Yes # of Evacuees _____

Type of Evacuation: ☐ Facility ☐ Community ☐ Exposed Business

Approximate Area Evacuated (Attach map if needed) _____

INCIDENT/CONSEQUENCES:

1. Spill: ☒ No ☐ Yes How Detected? _____
2. Fire: ☒ No ☐ Yes How Detected? _____
3. Explosion: ☒ No ☐ Yes
4. Vapor Gas Dispersion to Air off site: ☒ No ☐ Yes Distance _____
5. Vapor Gas Dispersion Confined to Structure: ☐ No ☐ Yes
6. Material entered Waterway: ☐ No ☒ Yes Storm Sewer: ☐ No ☒ Yes
   If Yes, Downstream Distance _____ Name UNNAMED TRIBUTARY TO BRANCH OF BIG CREEK
7. Material Entered Sanitary Sewer: ☒ No ☐ Yes
8. Material on Land: ☒ No ☐ Yes
   Surface Area & Depth of Soil Contamination: _____
9. Public Warning Issued ☒ No ☐ Yes How? _____
10. Any Off-site Monitoring Conducted? ☐ No ☒ Yes-Describe How Monitored and Concentration
    VISUALLY INSPECTED DOWNSTREAM - SPORADIC TRACES OF SHEEN
11. Other _____

ESTIMATED COSTS:

1. Product Loss 0
2. Facility or Carrier NA
3. Public/Private Property 0
4. Environmental SEWER CAMERA + SEWER JETTING $15,000
5. Remediation Costs BOOMS - $1000 VACUUM TRUCKS - $9000
6. Other 0

TOTAL ESTIMATED COST: $25000

CHOOSE WEATHER CONDITIONS:

Type of Cloud Cover: ☐ Sunny ☒ Partial Cloudy ☐ Overcast
Wind Direction: _____ Speed: _____ How Determined? _____
Relative Humidity: _____ Temperature: _____
Precipitation: ☐ Rain ☐ Snow ☐ Sleet ☐ Hail
Other _____

CHOOSE LAND USE TYPES:

☒ Industrial ☐ Residential ☐ Undeveloped
☐ Commercial ☐ Agricultural
PLANT PROPERTY AND OUTFALL 001

VEHICLE ACCIDENT:
☒ No ☐ Yes

TYPE OF INCIDENT:

☒ Facility ☐ Transportation

IF FACILITY:

Choose Factors Contributing to Release (explain if necessary):

☐ Equipment Failure
☐ Operator Error
☐ Process Design Problem
☐ Personnel Competence (Insufficient Training)
☒ Unusual Weather Conditions SNOW MELT - PARKING LOTS
☒ Other BREACH IN STORMWATER SUMPS

DESCRIBE THE ACTION TAKEN BY FACILITY, PRIOR TO ARRIVAL OF EMERGENCY RESPONDERS:

ADDITIONAL BOOMS PUT INTO CREEK. BOOMS PREVIOUSLY IN PLACE WERE CONTAINING SHEEN. VACUUM TRUCK CLEANED OUT OIL API SEPARATOR UPSTREAM OF DISCHARGE POINT. NO RESPONSE BY EMERGENCY RESPONDERS (CITY OR COUNTY)

CHOOSE FACILITY ACTIVITY CONTRIBUTING TO RELEASE (explain if necessary):

☐ Container/Handling
☐ Piping
☐ Blending/Mixing
☐ Storage
☐ Loading/Off Loading
☐ Product Transfer
☒ Other SCRAP METAL HANDLING

Describe Source of Release (i.e., flange, valve, etc.): 1. BOLT MISSING ON STORM SUMP COVER PLATE IN SCRAP PIT 2. BREACH IN CONCRETE STORM WATER SUMP IN SCRAP BALER BLDG. 3. SNOW MELT RUNOFF

IF TRANSPORTATION-Choose Type of Vehicles:

- ☐ Aircraft
- ☐ Barge
- ☐ Cargo Tank
- ☐ Flat Bed Truck/Trailer
- ☐ Rail Car
- ☐ Ship
- ☐ Tank Car
- ☐ Van Truck/Trailer
- ☐ Other _____

EQUIPMENT MANUFACTURER: _____

Year: _____

CHOOSE TRANSPORTATION PHASE DURING WHICH INCIDENT OCCURRED:

☐ En Route ☐ Loading ☐ Unloading ☐ Temporary Storage Terminal

Distance and Direction from Nearest Intersection (attach a map): _____

TRANSPORTATION:

- ☐ Shipper: _____
- ☐ Carrier: _____
- ☐ Cosignee: _____
- ☐ Designation: _____
- ☐ Road Conditions: _____

PROVIDE SUMMARY OF ACTIONS TAKEN TO PREVENT A RECURRENCE OF THE RELEASE:

COVER PLATE WAS REPLACED ON STORMWATER BUMP PUMP IN SCRAP PIT AND PUMP CONTROL PANEL WAS RE-MARKED TO ENHANCE IDENTIFICATION THAT PUMPS PUMP TO CREEK.

STORMWATER SUMP PUMPS IN SCRAP BALER PIT HAVE BEEN LOCKED OUT AND WATER IS BEING REMOVED BY VACUUM TRUCK AS NEEDED. STORM SUMP IS BEING RE-ENGINEERED TO COMBINE WITH INDUSTRIAL WASTE SUMP WHICH WILL BE SENT TO WASTE TREATMENT PLANT.

LIST ANY INCIDENT RELATED AIR, WATER OR OTHER PERMIT NUMBER:

NPDES OEPA 3IS00043*CD

CHRONOLOGICAL REVIEW OF THE INCIDENT. ATTACH ANY OTHER DOCUMENT WHICH MAY BE APPROPRIATE:

2/8/01 DISCOVERED OIL SHEEN AT OUTFALL
2/8/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/8/01 ADDITIONAL OIL BOOM PUT IN PLACE
2/9/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/9 TO 2/15 INVESTIGATION OF SITE FOR OIL SHEEN SOURCE
2/12/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/13/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/16/01 VACUUM TRUCK CLEANED API OIL SEPARATOR
2/17/01 SEWER CAMERA TRUCK INSPECTED SEWERS
2/17/01 DISCOVERED MISSING PLATE ON PIT SUMP
2/17/01 PUMPED OUT PIT SUMP WITH VACUUM TRUCK + REPAIRED PLATE
2/19/01 DISCOVERED BREACH IN SCRAP BALER SUMP PIT - LOCKED OUT PUMPS
2/19/01 VACUUMED OUT SUMP AND API OIL SEPARATOR
SINCE 2/8/01:
OIL BOOMS INSPECTED DAILY. MATERIAL BUILD UP BEHIND BOOMS MANUALLY REMOVED AS NEEDED. IN ADDITION FOLLOW UP INVESTIGATION AND RE-ENGINEERING IS CONTINUING AS PREVIOUSLY DESCRIBED.

OIL & GREASE SAMPLES TAKEN AT OUTFALL ON 2/8, 2/15 + 2/16 WERE ALL NON-DETECT @ 10 mg/l DETECTION LEVEL.

GM Environmental Spill/Release Tracking Form

PRIVILEGED AND CONFIDENTIAL
ATTORNEY CLIENT COMMUNICATION

WFG Region OHIO Division MFD
Plant Name MFD PARMA Plant Address 5400 CHEVROLET BLVD
Reported to the agencies by _____ Report Date/Time 2/26/01 9:10 AM
Title SR. ENV. ENG Phone Number 216-265-5391
Plant Response Personnel Contacted
BOB BOWSER & MAINT-PIPEFITTER
Form Submitted by: DIANE PALMER

Incident Description

Date of incident 2/26/01 **Time** _____ am/pm Released during Production hours yes /no / (unknown)

Location of Incident (be specific) Bldg (#, name) WTP Floor 1ST Bay/Dock # _____

Released offsite (be specific) NPDES OUTFALL 001

Was the release to LAND _____ AIR _____ WATER X "

Material FERRIC CHLORIDE SOLUTION **FID#** 332284 **WC#** _____
(Canada only)

Duration of Release (minutes, hours, days, etc) UNKNOWN (HRS) **Total amount spilled/released** EST 40-150 GAL

How was the release discovered? SPILLED MATERIAL FOUND BY WTP EMPLOYES AT START OF SHIFT 2/23/01
MATERIAL AT OUTFALL DISCOVERED 2/26/01 @ 8:40 AM

Boxed Area to be completed by US Facilities

RQ Substance FERRIC CHLORIDE **CAS #** 7705080 **# of RQ substance released** MAX _____ **Exceeded RQ ?** yes (

Was the release from a permitted source? yes (no) Exceed permit yes (no) Exceed permit by RQ? yes (no)

US EPA ID # OHD 086663101

Receiving body of water (stream, river, watershed, etc.) _____

Describe the event (include equipment and other details) _____

Describe Weather Conditions (precipitation, wind, temp. etc.) _____

Spill/Release reached (check all that apply)

1) Storm Sewer GM X NonGM _____
2) Surface Water GM _____ NonGM X
3) Sanitary Sewer GM _____ NonGM _____
4) Combined Sewer GM _____ NonGM _____
5) Publicly Owned Treatment Works: _____
6) Groundwater _____
7) Soil _____
8) Industrial Wastewater Treatment Plant X
9) Ambient Air _____
10) Other: _____

Bold Items –Required Information for Agency Reports
Supplement this report as new information arises.

GM Spill/Release Tracking Form Attachment

On Friday morning, February 23, 2001 attendants at the Waste Treatment Plant (WTP) discovered a valve had failed on a tote tank containing a Ferric Chloride solution (40%). The spill was contained within the building and the attendants flushed the material into the floor trenches that are pumped to the waste holding tank. Subsequent investigation revealed that a cover to the roof drain conductor clean out was missing in the floor of the WTP. Estimated quantity of material released was from 40 to 150 gallons of which less than 50 had reached the storm sewer.

On Friday afternoon on a routine inspection of the storm water system, orange colored water was discovered at the H-100 storm water lift station. The pumps at the station were locked out as well as the pumps at the storm water retention pond upstream from the WTP. A vacuum truck was called in to pump out the lift station pit. Visual inspections down stream from the lift station did not indicate any orange colored water. Orange material was discovered in the storm sewer where the roof drains from the WTP flow, upstream from the lift station.

The pumps were left locked out and two vacuum trucks were called in Saturday to continue pumping out the lift stations and the catch basins from the WTP storm sewer. After the lift station was completely cleaned, water was pumped from the retention pond to the lift station to flush the sewer line and the lift station was vacuumed out again. The lift station pumps were then put back on automatic mode.

After the low pH was detected at the outfall on Monday morning, pumps at the lift station and storm water retention pond were locked out again and vacuum trucks and sewer jetter trucks have been in daily pumping the pits and jetting sewer lines. Pumps at the lift station and storm water retention pond were locked out all week to minimize flow to the outfall while vacuuming and cleaningtook place. The pH on Friday March 2, 2001 was 7.1. Permit limit is 6.5 to 9.0.

The clean out in the floor of the WTP has been filled in with grout.

March 2, 2001

Ohio EPA,
Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087

Re: Reporting Incident No. 0102-18-0647

Dear Sir/Madam:

This letter is intended to confirm the verbal notification regarding General Motors' NPDES listed outfall No. 3IS00043**CD, (001), that was made to Mr. Tim Hickin on Monday, February 26, 2001 at about 9:10 AM. Diane Palmer, Senior Environmental Engineer at the General Motors MFD Plant in Parma, Ohio reported a release of ferric chloride solution that reached the storm sewer, and eventually outfall 001. The Northeast Ohio Regional Sewer District and LEPC were also notified.

Under Permit Item 12C:

1. Limit which may have been exceeded.

pH. A check of the creek on Monday morning with pH paper, indicated a pH between 5 and 6. The outfall sampling point had a pH between 4 and 5. The pH limit on our permit is 6.5 – 9.0.

2. The extent of the exceedance.

Outfall 001. (Unnamed tributary to west branch of Big Creek)

3. Cause of the exceedance.

On Friday morning, February 23, 2001 attendants at the Waste Treatment Plant (WTP) discovered a valve had failed on a tote tank containing a Ferric Chloride solution (40%). The spill was contained within the building and the attendants flushed the material into the floor trenches that are pumped to the waste holding tank. Subsequent investigation revealed that a cover to the roof drain conductor clean out was missing in the floor of the WTP.

waste holding tank. Subsequent investigation revealed that a cover to the roof drain conductor clean out was missing in the floor of the WTP. Estimated quantity of material released was from 40 to 150 gallons of which less than 50 had reached the storm sewer.

4. Period of the exceedance.

It is assumed the material reached the outfall following a period of rain on Saturday night, February 24, 2001. It was detected in the outfall on Monday morning at 8:40 AM.

5. Anticipated time exceedance will continue.

On Friday March 2, 2001 the pH (checked with pH paper) at the outfall sampling point was between 6 and 7 and in the creek it was above 6.5. Samples were sent to the lab for analysis.

6. Steps to reduce or prevent recurrence.

On Friday afternoon on a routine inspection of the storm water system, orange colored water was discovered at the H-100 storm water lift station. The pumps at the station were locked out as well as the pumps at the storm water retention pond upstream from the WTP. A vacuum truck was called in to pump out the lift station pit. Visual inspections down stream from the lift station did not indicate any orange colored water. Orange material was discovered in the storm sewer where the roof drains from the WTP flow, upstream from the lift station.

The pumps were left locked out and two vacuum trucks were called in Saturday to continue pumping out the lift stations and the catch basins from the WTP storm sewer. After the lift station was completely cleaned, water was pumped from the retention pond to the lift station to flush the sewer line and the lift station was vacuumed out again. The lift station pumps were then put back on automatic mode.

After the low pH was detected at the outfall on Monday morning, pumps at the lift station and storm water retention pond were locked out again and vacuum trucks and sewer jetter trucks have been in daily pumping the pits and jetting sewer lines. Pumps at the lift station and storm water retention pond have been locked out all week to minimize flow to the outfall. At this time the pH of water flowing into the lift station is 6.5. Cleaning is continuing downstream of the lift station.

The clean out in the floor of the WTP has been filled in with grout.

If you have any questions regarding the above, please contact Diane Palmer at (216) 265-5391 or Bob Bowser at (216) 265-5390.

Sincerely,

FOR E. TYLER

Elmer F. Tyler
Plant Manager

cc: LEPC
Richard Connelly, NEORSD

GM Environmental Spill/Release Tracking Form

PRIVILEGED AND CONFIDENTIAL
ATTORNEY CLIENT COMMUNICATION

WFG Region OHIO Division MFD
Plant Name MFD PARMA Plant Address 5400 CHEVROLET BLVD
Reported to the agencies by DIANE PALMER Report Date/Time 2/8/01 2:10 PM
Title SR. ENV. ENG. Phone Number 216-265-5391
Plant Response Personnel Contacted
BOB BOWSER & MAINT - PIPEFITTER
Form Submitted by: DIANE PALMER

Incident Description

Date of incident 2/8/01 Time 1:30 am/(pm) Released during Production hours (yes)/no / unknown

Location of Incident (be specific) Bldg (#, name) NPDES OUTFALL 001 Floor _____ Bay/Dock # _____

Released offsite (be specific) NPDES OUTFALL 001

Was the release to LAND _____ AIR _____ WATER X

Material OIL SHEEN FID# _____ WC# _____ (Canada only)

Duration of Release (minutes, hours, days, etc) INTERMITTENTLY CONTINUING Total amount spilled/released SHEEN

How was the release discovered? OEPA WAS FOLLOWING UP ON PREVIOUS SPILL FROM NEIGHB. FACILITY (NO GM INVOLVEMENT) AND CONTACTED

Boxed Area to be completed by US Facilities

RQ Substance OIL SHEEN CAS # NA # of RQ substance released NA Exceeded RQ ? yes

Was the release from a permitted source? (yes) no Exceed permit (yes) no Exceed permit by RQ? (yes) no OIL SHEEN

US EPA ID # OHD 086663103

Receiving body of water (stream, river, watershed, etc.) UNNAMED TRIBUTARY TO WEST BRANCH OF BIG C

Describe the event (include equipment and other details) REGGIE BROWN (OEPA) NOTIFIED D. PALMER OF SHEEN, SEE ABOVE. BOOMS WERE ALREADY IN PLACE. VAC TRUCK CALLED IN TO CLEAN API OIL SEPARATOR. ADDITIONAL BOOMS PUT DOWN.

Describe Weather Conditions (precipitation, wind, temp. etc.) PARTIAL CLOUDY TEMP 33°-38° F

Spill/Release reached (check all that apply)

1) Storm Sewer GM X NonGM ____
2) Surface Water GM ____ NonGM X
3) Sanitary Sewer GM ____ NonGM ____
4) Combined Sewer GM ____ NonGM ____
5) Publicly Owned Treatment Works: ____
6) Groundwater ____
7) Soil ____
8) Industrial Wastewater Treatment Plant ____
9) Ambient Air ____
10) Other: ____

Bold Items –Required Information for Agency Reports
Supplement this report as new information arises.

February 15, 2001

Ohio EPA
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087

Re: Reporting Incident No. 0102-18-0422

Dear Sir/Madam:

This letter is intended to confirm the verbal notification regarding General Motors' NPDES listed outfall No. 3IS00043**CD, (001), that was made to Mr. Todd Taylor on Thursday, February 8, 2001 at about 2:10 PM. Diane Palmer, Senior Environmental Engineer at the General Motors MFD Plant in Parma, Ohio reported an oil sheen at outfall 001. The Parma Plant has had several discussions with Mr. Reggie Brown of the OEPA regarding this matter, including regarding investigation and interim steps to implement.

Under Permit Item 12C:

1. Limit which may have been exceeded.

Visible oil sheen. Upon discovery of the sheen, the Parma Plant had a sample taken of the discharge at the outfall. The results are non-detect for oil and grease.

2. The extent of the exceedance.

Outfall 001. (unnamed tributary to west branch of Big Creek)

3. Cause of the exceedance.

The Parma Plant has been vigorously investigating this matter, including examining outside storage pads and storm water systems. The source has

Parma Plant
General Motors Corporation 5400 Chevrolet Boulevard, Parma, Ohio Mail Address: P.O. Box 30098, Parma, Ohio 44130

not yet been identified and we are actively pursuing this matter. In addition, as described under item 6, the Parma Plant is taking interim steps to address this matter.

4. Period of the exceedance.

Continuing.

5. Anticipated time exceedance will continue.

Unknown at this time.

6. Steps to reduce or prevent recurrance.

Oil booms are regularly in place at the outfall. Based on this matter, and as part of the Parma Plant's discussions with Mr. Brown, additional booms have been placed at the outfall and are being regularly checked and replaced as needed. The API separator at the storm water reservoir was routinely cleaned on January 26, 2001. After the sheen was noticed, the API separator has been cleaned on February 8, 9, 12 and 13, 2001. The Parma Plant will continue to clean the API separator as needed.

If you have any questions regarding the above, please contact Diane Palmer at (216) 265-5391 or Bob Bowser at (216) 265-5390.

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

FOR E. TYLER

Elmer F. Tyler
Plant Manager

cc: LEPC
Richard Connelly, NEORSD

June 9, 2000

Ohio EPA
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087

Re: Reporting Incident No. 0006-18-2069

Dear Sir/Madam:

This letter is intended to confirm the verbal notification regarding General Motors' NPDES listed outfall No. 3IS00043**CD, that was made to Mr. Tim Hickin on Monday, June 5, 2000 at about 1:45 PM. Diane Palmer, Senior Environmental Engineer at the General Motors Plant in Parma, Ohio reported an exceedance of the oil and grease limit on a sample taken on May 24, 2000. The results were received on June 5, 2000. This notification was made as required under Section 12B of this permit.

Under Permit Item 12C:

1. Limit which may have been exceeded.

The lab reported a total oil and grease of 28.6 mg/l. The daily limit is 15 mg/l.

2. The extent of the exceedance.

Outfall 001. (unnamed tributary to west branch of Big Creek)

3. Cause of the exceedance.

A visual inspection of the outfall at the time the sample was taken revealed no visible signs of contamination or sheen.

4. Period of the exceedance.

Previous samples taken on May 12 and 18, 2000 were below detection limit. A sample taken on June 5, 2000 had an oil and grease below the detection limit of 10 mg/l.

Parma Plant
General Motors Corporation 5400 Chevrolet Boulevard, Parma, Ohio Mail Address: P.O. Box 30098, Parma, Ohio 44130

5. Anticipated time exceedance will continue.

Not Applicable

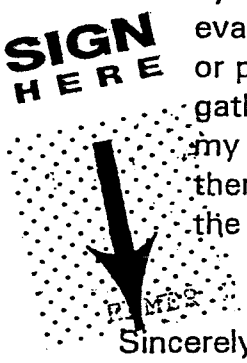
6. Steps to reduce or prevent recurrance.

Oil booms are in place at the outfall. Outside storage pads and storm water systems were investigated and no unusual situations or spills were discovered. The API separator at the storm water reservoir was routinely cleaned on June 1, 2000.

If you have any questions regarding the above, please contact Diane Palmer at (216) 265-5391.

Pursuant to the 40 CFR 122.22 certification requirement:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Sincerely,

Elmer F. Tyler
Plant Manager

December 9, 1999

Mr. Jim Irwin
Ohio EPA
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087

Re: Reporting Incident No. 9912-18-4221

Dear Mr. Irwin:

This letter is intended to confirm the verbal notification regarding General Motors' NPDES listed outfall No. 3IS00043 , that was made on Monday, December 6, 1999 at about 11:30 AM. Diane Palmer, Senior Environmental Engineer at the General Motors Plant in Parma, Ohio reported a release of oil contaminated material into a storm sewer catch basin. This sewer eventually flows to N.P.D.E.S. outfall 001 (OH0002275)(OEPA Permit No. 3IS00043*CD). This notification was made as required under Section 12B of this permit for potential noncompliance these observed circumstances may have caused.

Under Permit Item 12C:
1. Limit which may have been exceeded.

It was observed that there was a sheen on the outfall that may have been due to the material contaminated with oil entering the storm water catch basin.

2. The extent of the exceedance.

It was earlier in the morning on Monday December 6 when the discharge from a sump pump storm water was observed to be pumping the oil contaminated material from a pit excavation inside the plant to the catch basin. At 9:45 a.m. on December 6, 1999 an employee noticed the water pumping out had turned brown colored. He immediately had the pump shut off.

A check of the outfall at about 10:00 AM did not show any indication that the material had reached the creek, however there was a slight oil sheen. There was also a sheen on the W. 130th St. outfall sewer and the twin arches sewer that converge with our NPDES outfall.

Parma Plant
General Motors Corporation 5400 Chevrolet Boulevard, Parma, Ohio Mail Address: P.O. Box 30098, Parma, Ohio 44130

A vacuum truck was brought in and we did collect a slug of oil contaminated material from the catch basin and sewer and removed it to our on-site waste water treatment system. The oil boom in place had apparently prevented any major oil from reaching the creek. Fresh booms were put in place following the sewer cleaning that afternoon.

The discharge of this sheen is prohibited under Section 2-B of the above permit.

3. Cause of the exceedance.

The discharge of stormwater from the excavation was undertaken after the inspection of the area revealed no visible signs of contamination or staining and the discharge was clear water. The oil-contaminated material is not readily known, from our experience, and inspection of the excavation following the incident has not resulted in an obvious source.

We are visually monitoring these activities more frequently and in the future the storm water from the pit excavations will be sent to our wastewater treatment plant.

4. Period of the Exceedance.

The oil sheen observed on the NPDES Outfall was gone by mid afternoon on Monday December 6 and fresh booms were in place. The time that the sump pump began removing the oil-contaminated material is not known.

5. Anticipated Time Exceedance will continue.

Not Applicable

6. Steps to Reduce or Prevent Occurrence

In the future the stormwater from any excavations will be pumped to our on-site wastewater treatment plant and these operations will be closely observed.

If you have any questions regarding the above, please contact Diane Palmer at (216) 265-5391.

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

W. D. Bartlett (ACTING PLANT MANAGER)

for Elmer F. Tyler
Plant Manager

March 7, 1997

National Response Center
2100 Second Street, S.W.
Washington, D.C. 20593

Re: March 2, 1997 Reporting Incident No. 378665

Dear Sir/Madam:

On Sunday, March 2, 1997 at 11:30 a.m., Diane Palmer, Senior Environmental Engineer at the General Motors Plant in Parma, Ohio reported a spill of approximately 160 gallons of hydraulic oil of which approximately 80 gallons entered a storm sewer east of the Baler Bldg. This resulted in an oil sheen at our N.P.D.E.S. outfall 001 (OH0002275). The Northeast Ohio Regional Sewer District and State Emergency Response Center (Report #9703-18-0784) were also notified.

At 9:27 a.m., Plant Security received a call reporting an oil spill outside the Baler Bldg. It was reported that a fork truck driver moving a portable tank of hydraulic oil had accidentally knocked the valve off the tank. The driver was able to lift the leaking tank over some empty containers in the area, catching some of the oil. Approximately 160 gallons of oil spilled on the ground and about half of this entered a storm sewer. The sewer was diked off with absorbent that was also spread on the remaining oil on the ground.

The outfall was checked and initially showed no sign of oil. There was one existing oil boom in place at this time. At approximately 10:00 a.m., an oil sheen showed up at the outfall. Maintenance personnel installed two additional oil booms across the creek.

Downstream from the storm sewer and prior to the outfall is an API oil/water separator. Most of the oil that entered the sewer was contained in this structure. It is estimated that less than 10 gallons of oil made it to the outfall in the form of an oil sheen.

A vacuum truck was called in and vacuumed the floating oil from the separator. This oil was disposed at our oily waste treatment plant. The absorbent at the oil spill site was swept up and disposed with our grinding swarf waste.

If you have any questions regarding the above, please contact Diane Palmer at (216)265-5391.

Parma Plant

General Motors Corporation 5400 Chevrolet Boulevard, Parma, Ohio Mail Address: P.O. Box 30098, Parma, Ohio 44130

National Response Center

March 6, 1997

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

This certification is made on behalf of General Motors Corporation.

Sincerely,

Robert L. Lintz
Plant Manager

cc: D.M. Palmer
Ohio Emergency Response Center (Report No. 9703-18-0784)
Cuyahoga County LEPC

National Response Center March 6, 1997

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

This certification is made on behalf of General Motors Corporation.

Sincerely,

Robert L. Lintz
Plant Manager

cc: D.M. Palmer
Ohio Emergency Response Center (Report No. 9703-18-0784)
Cuyahoga County LEPC

bcc: R. Bowser
E. Jenkins - WFG
J. Walle - GM Legal Staff

January 8, 1993

Timothy O. Hickin,
Emergency Response Unit Supervisor
Ohio Environmental Protection Agency (OEPA)
Division of Emergency and Remedial Response (DERR)
P.O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Certified Mail No.
P 067 340 838
Return Receipt Requested

Re: INCIDENT # 9212-18-5110 Information Request

Dear Mr. Hickin:

Pursuant to your request dated December 18, 1992, the following information is provided in the format requested:

1. Reporting

(a) At approximately 10:00 a.m. on December 4, 1992, approximately 2,100 gallons of aluminum sulfate (alum) were released to a storm drain southwest of the Wastewater Treatment Plant (WWTP) at the General Motors facility in Parma, Ohio. The amount was initially reported as 3,500 gallons, however, information obtained subsequently indicates the maximum amount on site at the time was 2,156 gallons.

(b) At approximately 10:00 a.m. on December 4, 1992, Maintenance personnel, who were moving a portable tank containing the aluminum sulfate, noticed the released material entering the storm sewer.

(c) Maintenance personnel immediately notified management personnel at the WWTP when the accident occurred. WWTP supervision reported the spill to the Plant Security and Environmental Engineering Departments. Plant Security records indicate the call was received at 9:57 a.m. At 10:30 a.m., Ms. Diane Palmer, Senior Environmental Engineer, reported the release of approximately 3,500 gallons of aluminum sulfate (alum) to the National Response Center and Ms. Julie Smith of the OEPA DERR.

(d) OEPA Incident # was 9212-18-5110.

(e) At 10:30 a.m., Ms. Diane Palmer, Senior Environmental Engineer, reported the release of approximately 3,500 gallons of aluminum sulfate (alum) to the National Response Center and the OEPA DERR.

2. Location

(a) General Motors Corporation - Parma Plant
5400 Chevrolet Blvd.
Parma, Ohio 44130

(b) The released material entered the storm sewer at the WWTP. The storm sewer system discharges to an NPDES outfall located in Cuyahoga County, Parma, Ohio.

5. Monitoring and Detection

(a) When the spill occurred, all the alum that reached the storm sewer flowed to the storm sewer lift station on the west side of the Pressed Metal Building. The pumps at this station were shut off until the diluted alum could be pumped out by Samsel Services Company. The pH at the spill site was continuously checked until the spill area was neutralized. To insure that any discharge from the lift station would not cause the pH limit at our NPDES outfall to be exceeded, all storm water in the lift station was removed. However, as we reported to Ms. Julie Smith of the Ohio EPA, after the pumps were restarted on Monday morning, December 7, 1992, the effluent at the NPDES outfall was sampled and the pH was 4.55 An investigation has revealed that since the pumps were off all weekend, there was negligible flow in the storm sewer line. However, when the pumps were turned back on, it appears that a small amount of alum (< 300 gallons) had settled in the storm sewer system before the pumps were turned off. When this material reached our NPDES outfall, it caused the pH to drop to 4.55. However, within less than two hours, the pH returned to within the NPDES limits of 6.5 S.U. to 9.0 S.U. Therefore, only a minimal amount reached the County sewer system and it was immediately neutralized by the slightly alkaline discharge of the other County sewer outfalls downstream.

(b) NA

(c) No, there was no need to warn the public.

6. Mitigation, Containment Action

(a) It is believed that approximately 1,800 gallons of product was recovered or neutralized.

(b) The diluted alum was pumped out of the storm sewer lift station by Samsel Services Company.

(c) The recovered, contaminated alum was pumped into our WWTP Holding Tank.

(d) The pumps at the lift station were shut off until the diluted alum could be removed by Samsel Services Company. Booms, siphon dams, sorbent, etc. were not used since they would not have been effective in containing a soluble product like alum.

Friday, December 4, 1992 (Continued)

1:00 p.m. (approx.) The Environmental pipefitter sampled the pH of the effluent at the NPDES outfall. The pH was within limits.

3:30 p.m. Samsel Services Company finished pumping the recovered alum to the WWTP Holding Tank and departed.

Monday, December 7, 1992

7:00 a.m. The Environmental Pipefitter activated the Stormwater Retention Lagoon pumps and the Lift Station pumps west of the Pressed Metal Building, then proceeded to the NPDES outfall to view and sample the effluent.

8:00 a.m. Sample was measured in Met Lab and found to be 4.55.

9:10 a.m. Outfall was re-sampled and pH was 6.50.

10:08 a.m. Outfall was re-sampled and pH was 7.31.

1. Photographs and Spill Report (dated December 8, 1992) that was sent to the National Response Center and the OEPA DERR are attached.

12. The release was caused by the saddle support breaking on the portable tank while it was being relocated. Future liquid alum deliveries will be directly into the WWTP.

13. Economic Impact

(a) Spilled alum cost $1,824.00.

(b) Repairs of the broken saddle supports and the drain valve on the portable tank are estimated to cost less than $700.00.

(c) The spill cleanup cost $1,100.00.

(d) The estimated cost of spill prevention to eliminate possible reoccurrence of this event is $0. The delivery process was modified to utilize other existing storage tanks within the WWTP.

14. If you have any questions regarding the above, please contact Ms. Diane Palmer or me at (216) 265-5390.

Sincerely,

Stephen P. Krupa
Superintendent - Environmental Activities

December 8, 1992

CPO Bruyere, U. S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D. C. 20593

Certified Mail No.
P 067 340 837
Return Receipt Requested

Re: December 4, 1992 Reporting Incident No. 147637

Dear Mr. Bruyere:

On Friday, December 4, 1992 at 10:30 a.m., Ms. Diane Palmer, Senior Environmental Engineer at the General Motors Facility in Parma, Ohio reported a release of approximately 3,500 gallons of aluminum sulfate (alum) to a storm drain southwest of the Wastewater Treatment Plant (WWTP).

An investigation has revealed the following. At approximately 10:00 a.m. on December 4, 1992, maintenance personnel were moving a portable tank containing aluminum sulfate on the driveway outside the WWTP. One of the support saddles broke and the tank dropped, snapping off the drain valve. The aluminum sulfate spread over a 25' x 40' area of the driveway and began to drain into a storm sewer catch basin.

All the alum that reached the storm sewer flowed to the storm sewer lift station on the west side of the Pressed Metal Building. The pumps at this station were shut off until the diluted alum could be pumped out by Samsel Services Company. The recovered, contaminated alum was pumped into our WWTP Holding Tank. Throughout the recovery effort, the pH was monitored at the lift station to insure that its discharge would not exceed the limit at our NPDES outfall. However, as we reported to Ms. Julie Smith of the Ohio EPA, after the pumps were restarted on Monday morning, December 7, 1992, the pH was monitored at the NPDES outfall. It appears that a small amount of alum had entered the storm sewer system before the pumps were turned off on Friday morning. When this material reached our NPDES outfall, it caused the pH to drop to 4.55. However, within less than two hours, the pH returned to within the NPDES limits of 6.5 S.U. to 9.0 S.U. Therefore, only a minimal amount reached the County sewer system and it was immediately neutralized by the slightly alkaline discharge of the other County sewer outfalls upstream.

If you have any questions regarding the above, please contact Ms. Diane Palmer or Mr. Steve Krupa at (216) 265-5390.

October 19, 1992

Ms. Julie Smith
Ohio Environmental Protection Agency
Emergency Response Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Ms. Smith:

On Wednesday morning, October 14, 1992 at 9:09 a.m., Mr. Stephen Krupa, Superintendent - Environmental Activities, reported (Report No. 9210-18-4421) a visible sheen on the storm water system at the N.P.D.E.S. Outfall (OEPA Permit No. 3IS00043*CD).

As he explained, we experienced a heavy rainfall (0.73 inches) during the early hours of Wednesday morning. It appears this rainfall washed considerable amounts of oil and grease from the parking lots and storage areas throughout the Complex into our stormwater system, overwhelming the API separator. Oil booms were in place, prior to the rainfall, but the excessive stormwater flow allowed some of the retained material to continue downstream. However, as Mr. Krupa also reported, the two other outfalls contributing to the tributary that receives our discharge had visible sheens greater than the one from our facility. Mr. Jim Irwin of your Northeast District Office was alerted to this fact after you were called.

Grab samples of the stormwater effluent were collected daily for the week ending October 16, 1992. They are being analyzed to determine what impact, if any, our stormwater discharge had on the receiving stream and these results will be forwarded to you.

If you have any questions regarding the above, please contact Mr. Krupa at (216) 265-5390.

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

GM

September 11, 1992

CPO Wilkerson, U. S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D. C. 20593

Re: Follow-up of Incident No. 134361

Dear Mr. Wilkerson:

As promised in Mr. Robert L. Lintz's letter of September 3, 1992 regarding the above referenced subject, the following analytical results are available:

Sampling Location	Parameter	Results (mg/L)	Method
Storm	Oil & Grease	ND*	USEPA 413.1
Storm	Copper	0.01	USEPA 200.7
Storm	Zinc	0.23	USEPA 200.7
Sanitary	Oil & Grease	110	USEPA 413.1
Sanitary	Copper	0.18	USEPA 200.7
Sanitary	Zinc	1.40	USEPA 200.7

* ND = None Detected

All reported values are within normal limits for the appropriate sewer system, i.e. < 15 mg/L for Fats, Oils & Greases (FOG) for the stormwater; and < 250 mg/L for FOG, < 3.38 mg/L for Copper and < 2.61 mg/L for Zinc for the sanitary sewer. As you can see, there was no adverse impact on the environment from the reported release on either sewer system.

If you have any questions regarding the above, please contact me at (216) 265-5390.

Sincerely,

Stephen P. Krupa
Superintendent -
Environmental Activities

cc: L. Adloff, NEORSD
J. Harding, CECOMS
T. Hickin, Ohio EPA (Report No. 9208-18-3813)
Ohio Emergency Response Center
J. Irwin, OEPA-Cleveland
J. Schuler, ODNR

September 3, 1992

CPO Wilkerson, U. S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D. C. 20593

Certified Mail No.
P 067 340 831
Return Receipt Requested

Re: August 29, 1992 Reporting Incident No. 134361

Dear Mr. Wilkerson:

On Sunday, August 30, 1992 at 12:43 a.m., Mr. Larry Nowicki, General Supervisor of Building Maintenance at the General Motors Facility in Parma, Ohio reported a release of less than 50,000 gallons of partially treated wastewater to a storm drain southwest of the Pressed Metal facility and an unknown amount of wastewater into the sanitary sewer system. The wastewater released to the storm sewer flowed through our NPDES outfall (OEPA Permit No. 3IS00043, OH0002275) and combined with two other outfalls before proceeding through a Trailer Park to an unnamed tributary of Big Creek. The wastewater released to the sanitary sewer system flowed to the Northeast Ohio Regional Sewer System. Representative samples of these releases were obtained. These samples have been sent out for analysis to determine the presence and levels of oil and grease, zinc and copper (the primary pollutants of the processed wastewater). The results will be forwarded to you as soon as they become available.

An investigation has revealed the following. At approximately 9:15 p.m. on August 29, 1992, Plant Security personnel observed that the 400,000 gallon Industrial Wastewater Holding Tank (IWHT) was at a near-overflow level of 15'-4", indicative of a potential discharge to the sanitary sewer. While returning to the Security Office, wastewater was observed flowing from the Wastewater Treatment Plant (WWTP) across the roadway to the storm drain southwest of the Pressed Metal facility. Maintenance personnel were contacted to determine and stop the source of this water flow. The WWTP operator (who had worked at the WWTP from 6:00 a.m. to 2:30 p.m.) was summoned at 9:45 p.m. to begin processing the industrial wastewater to reduce the level in the IWHT. Supervisory personnel observed that the level of the 400,000 gallon Clarifier tank had dropped approximately five feet (or about 135,000 gallons of processed wastewater) and that the trenches inside the WWTP were full of water. The operation of the WWTP lowered the level of the IWHT and the sump pumps lowered the level in the trenches.

Duty Officer
National Response Center

September 3, 1992

To prevent a recurrence of this situation, Maintenance personnel will install an industrial wastewater Holding Tank high level alarm indicator in the proprietary system at the WWTP. This will alert Plant Security personnel when the level of the Holding Tank is approaching a level where WWTP activity is required. In addition, the WWTP operator has been re-instructed on the proper shut down procedure.

If you have any questions regarding the above, please contact Mr. Stephen P. Krupa, Superintendent of Environmental Activities at (216) 265-5390.

Sincerely,

Robert L. Lintz
Plant Manager

cc: L. Adloff, NEORSD
J. Harding, CECOMS
T. Hickin, Ohio EPA (Report No. 9208-18-3813)
Ohio Emergency Response Center
J. Irwin, OEPA-Cleveland
S. Krupa
J. Schuler, ODNR

bcc: R. Bruck
T. Kline - GM RES-EA
R. Maag
L. Nowicki
D. Palmer
R. Pearson
D. Puma
R. Sobczynski - NAO Operations Engineering
J. Walle - GM Legal Staff

August 26, 1992

Duty Officer, U. S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D.C. 20593

Re: Accidental Release - Report No. 133522

Gentlemen:

On August 25, 1992 at 12:35 p.m., Ms. Diane Palmer contacted your office to report an accidental release of gasoline into a storm water drain trench. Investigations indicate that two 50 gallon capacity gasoline tanks removed from a semi-tractor were moved from their original storage location to an area near the drain trench. The tanks were discovered by an employe after the gasoline had run out of the tanks from the disconnected fuel lines. The employe notified Plant Security at 12:15 p.m. who then responded with the plant Chemical Spill Team. Approximately 25-35 gallons of gasoline was found to be contained in the trench. The storm lines to the trench were found to be plugged solid with dirt and sediment, preventing the gasoline from leaving the trench. Free liquid was pumped from the trench into a 55 gallon drum. Activated charcoal was then put into the trench over the sediment. The sediment and charcoal were then cleaned out of the trench and put into a separate 55 gallon drum. These drums were then labelled and taken to the Hazardous Material Building to await disposal.

We feel that no damage to the environment occurred from this release and all spilled gasoline was recovered.

To prevent the recurrence of this incident, Maintence and Truck Repair have been notified of the incident and advised of proper handling and storage procedures for working on fuel tanks.

If you should have any further questions, I may be contacted at (216) 265-5390.

Very truly yours,

Stephen P. Krupa
Superintendent
Environmental Engineering

cc: Marcie Burrows - Ohio EPA (Notice No. 9208-18-3737)

July 24, 1992

Petty Officer Moore, U. S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D. C. 20593

Certified Mail No.
P 067 340 825
Return Receipt Requested

Re: July 22, 1992 Reporting Incident No. 128169

Dear Mr. Moore:

On Wednesday, July 22, 1992 at 9:22 a.m., Mr. Stephen Krupa, Superintendent of Environmental Activities at the General Motors Facility in Parma, Ohio reported a discharge of less than 10,000 gallons of contaminated cooling tower water to a drainage ditch west of the facility. The county stormwater system receiving this discharge showed signs of iron deposits and a slight oil sheen. This effluent combined with two other outfalls and proceeded through a culvert through a Trailer Park to an unnamed tributary of Big Creek. Although originally reported to be approximately ten feet wide, the sheen was later determined to be less than six feet - the width of the stream as it entered the Trailer Park.

The discharge was stopped at approximately 9:00 a.m. and an oil boom was placed across the outfall. Samples were taken from the county sewer both upstream and downstream from the point where the drainage ditch effluent entered the sewer to determine if the oil sheen was originating from this discharge or further upstream. No oil was detected in either sample which indicates that the discharge did not contribute any extra oil to the storm sewer. The oil sheen observed was probably due to previous oil stains which leach into the storm sewer when the water level rises.

A further investigation has revealed the following. Approximately 14,500 gallons of contaminated weld water were discharged over the two-day period. On July 21, 1992, Maintenance personnel discovered that the Pressed Metal Closed Loop Welder Water Cooling Tower (Weld Water) pit, which had been drained the previous day, was filling with water. It was determined that city water, which was being used in a production operation in the facility, had leaked into the Closed Loop system. The Maintenance personnel drained the water to the stormwater system. When this was discovered by Mr. Krupa, it was stopped. Maintenance personnel will discuss with the Environmental Engineering Department any system dumps prior to initiating them.

November 11, 1991

Ms. Marcie Burrow
Duty Officer
Ohio Environmental Protection Agency
Emergency Response Center
Columbus, Ohio 43216-1049

Dear Ms. Burrow:

On November 4, 1991 at 3:48 p.m., Mr. Stephen P. Krupa contacted you to report (Report No. 9111-18-4697) a diesel fuel spill of an unknown amount on the concrete pad east of the Powerhouse at the C-P-C Parma Plant. The source of the diesel fuel was an unattended diesel fuel nozzle which was partially opened and found lying on the pad near one of four rented diesel-powered air compressors. The nozzle was discovered at approximately 7:00 a.m. by Powerhouse personnel. As he explained, preliminary investigations indicated that diesel fuel did not reach any of the waters of the State. However, diesel fuel did seep through cracks in the concrete and had contaminated the soil beneath.

Clean Harbors of Cleveland, Ohio is on-site removing underground storage tanks and was summoned to assist in the clean-up. Portions of the concrete pad were removed and soil remediation was performed.

Based on a review of usage records and a check of the fuel tank level, we estimate that less than 25 gallons of diesel fuel was spilled. Normal operating procedure requires that a shutoff valve near the fuel tank be closed after each use. This valve was found open when the spill was discovered. Powerhouse personnel have been re-instructed on the diesel refueling procedure.

If you have any questions regarding the above, please contact Mr. Krupa or Ms. Diane Palmer at (216) 265-5390.

Pursuant to the 40 CFR 122.22 certification requirement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Robert L. Lintz
Plant Manager

cc: S. Krupa
D. Palmer

December 20, 1990

Duty Officer, U. S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D.C. 20593

Re: Follow-up on Potential Release - Report No. 49761

Gentlemen:

As we advised you by letter dated December 6, 1990, C-P-C Parma performed sampling of its industrial Wastewater Treatment Plant (WWTP) in response to the above-listed potential release. The results of the sampling performed at the WWTP for the presence of methanol, mineral spirits or 1,1,1-trichloroethane, primary materials in the drum of waste solvent in question, are as follows:

Tank Sampled	Parameter	Results
Clarifier - Dip	Methanol	2.9 mg/l
	1,1,1-Trichloroethane	8 ug/l
	Mineral Spirits (CAS #741657)	ND*
Holding Tank - Effluent	Methanol	ND
	Mineral Spirits	ND
Holding Tank - Sludge	Methanol	ND
	Mineral Spirits	ND

* ND - None detected

The concentration of the 1,1,1-Trichloroethane detected in the Clarifier is well below the 40 CFR 433 TTO limit of 2.13 mg/l. The concentration of Methanol is well below the 250 mg/l limit of the NEORSD Sewer Use Code (Section 1.0914).

If you should have any further questions, please feel free to contact me at (216) 265-5390.

Very truly yours,

Stephen P. Krupa
Superintendent -
Environmental Activities

cc: L. Adloff - NEORSD
T. Hickin - Ohio EPA (Notice No. 12-18-5541)

December 6, 1990

Duty Officer, U. S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D.C. 20593

Re: Accidental Release - Report No. 49761

Gentlemen:

On December 3, 1990 at 3:00 p.m., Ms. Diane Palmer contacted your office to report an accidental release of waste solvent into our industrial wastewater system. Investigations indicate that a 55-gallon drum of waste solvent, properly labeled with the appropriate "Hazardous Waste" labeling, was picked up by a Maintenance Truck Driver for delivery to the Hazardous Material Building for storage prior to disposal. When the hazardous waste hauler came to pick up the drum for transportation to the reclamation facility, the drum was missing. A search located the drum within the Main Plant near an industrial wastewater dump station. Approximately 40 gallons of waste solvent were missing.

The contents of the drum were primarily methanol, mineral spirits and a small quantity of 1,1,1-trichloroethane. The industrial Wastewater Treatment Plant Holding Tank and Clarifier were sampled on Tuesday, December 4, 1990, for the presence of methanol, 1,1,1-trichloroethane, and mineral spirits. We are presently awaiting the results of the analyses of these samples, but believe the concentrations will be well below the TTO limits of the Northeast Ohio Regional Sewer District, even assuming the waste solvent was introduced into the WWTP. We feel that no damage to the environment occurred from this release.

To prevent the recurrence of this incident, the truck driver and his supervisor have been re-trained in the procedures for transportation and disposal of hazardous waste.

If you should have any further questions, I may be contacted at (216) 265-5390.

Very truly yours,

Stephen P. Krupa
Superintendent
Environmental Engineering

cc: L. Adloff - NEORSD
T. Hickin - Ohio EPA (Notice No. 12-18-5541)

Chevrolet-Pontiac-Canada Group

Parma Plant
General Motors Corporation
P.O. Box 30098
Parma, Ohio 44130

May 31, 1989

Duty Officer, U.S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D.C. 20593

Gentlemen:

This letter is to confirm our telephone notification of a spill of VM&P Naptha Paint Thinner on Thursday, May 18th, 1989.

At approximately 4:00 P.M. our Plant Security Department was notified of a drum leaking material into a storm sewer on a concrete storage pad outside of the Prop Shaft Building.

The storm sewer was diked off with absorbent socks, and the remaining material was absorbed and contained in a 55-gallon drum. Although the label on the leaking drum was partially obscured, the odor and appearance were consistent with VM&P Naptha. It is estimated that approximately 40 gallons of material was released, and approximately 20-30 gallons entered the storm sewer from a puncture hole in the drum.

Due to the flammable nature of the material, the Parma Fire Department was called. The Fire Department flushed the sewer with approximately 500 gallons of water.

This sewer runs to an oil skimmer into a reservoir retention pond. From there it is pumped to an A.P.I. separator before discharging to the outfall at the Brookpark Road culvert. Samples of this outfall were taken for a week's period and will be analyzed for VM&P Naptha.

Telephone notification was made to the Northeast Ohio Regional Sewer District at approximately 5:00 P.M. The National Response Center was notified at 6:37 P.M. (Report #7664) and the Ohio EPA was notified at 6:55 P.M. on May 18th, 1989.

Chevrolet·Pontiac·Canada Group

Parma Plant
General Motors Corporation
P.O. Box 30098
Parma, Ohio 44130

July 22, 1988

Duty Officer, U.S. Coast Guard
National Response Center, Room 2611
2100 Second Street, S.W.
Washington, D.C. 20593

Dear Sir:

This letter is to confirm our telephone notification of a reportable release of a hazardous substance as required under CERCLA.

The release which occurred on July 8, 1988, at approximately 1:45 P.M., consisted of approximately 200-400 gallons of 93.2% concentrated sulfuric acid. It was a result of a deteriorated plate at the bottom of an 8,426 gallon capacity steel above-ground tank. The release was contained within a limestone lined diked area. The sulfuric acid was neutralized with a caustic soap then flushed to a sump in the diked area. It was pumped from there to our Waste Treatment Plant.

Notification was made to the National Response Center on July 9, 1988, at approximately 1:40 P.M.. to Mr. Peng, #9146. Mr. James Irwin and Mr. Michael Dalton of Ohio EPA were also notified.

Very truly yours,

DENNIS K. DAVIS
Supt. Facilities Engineering

/mlr
cc: James Irwin, Ohio EPA

Chevrolet-Pontiac-Canada Gr

Parma P
General Motors Corpora
P.O. Box 3(
Parma, Ohio 4

July 14, 1988

Chief Thomas Romeo
Parma City Fire Department
6655 Ridge Road
Parma, Ohio 44129

Dear Chief Romeo:

This letter is to follow-up on an incident that occurred Friday, July 8, 1988 at the Chevrolet-Pontiac-Canada Group, General Motors plant located at 5400 Chevrolet Boulevard, Parma, Ohio.

At 2:20 p.m., July 8, 1988 a leak at the bottom of a sulfuric acid tank was reported to Plant Security. The acid tank is located in the plant tank farm west of our powerhouse. The leaking tank is a 10,000 gallon horizonal, above ground storage tank. It contained 1985 gallons of sulfuric acid (95% pure). The tank is grouped in a tank farm with a common gravel base containment dike that drains into a sump pit. The sump pit pumps run off rain water or leaking chemicals into our filtration building for processing before discharge into the sewers.

The leak was from corroded 2" pipe located at the bottom of the west end of the tank. The leak was stopped by 4:30 p.m. About 200 gallons of sulfuric acid leaked from the tank. The acid ran into the sump and was pumped to the filtration building. The acid on the dike gravel was chemically neutralized. The remaining acid in the tank was pumped into a truck tanker.

At 11:40 p.m. Parma Fire Department was at the plant. The leak area was inspected and it was observed that none of the acid had left the property. Parma Fire Department departed the plant at 12:45 a.m.

On Saturday, July 9, 1988 the National Response Center and Ohio E.P.A. was advised of the acid leak.

On July 14, 1988 cleaning started on the sulfuric acid tank. The tank will be cleaned and inspected before being used again. Erieway Inc., 33 Industry Drive, Bedford, Ohio, 44146, phone no. 447-1266, will clean the tank. Erieway's E.P.A. ID number is OHD-055522429.

The waste sludge from the tank cleaning will be hauled by Chem Freight, 6600 Bessemer Ave., Cleveland, OH, phone no. 341-2500. Chem Freight's E.P.A. ID number is OHD-986966190.

SEC.G14H

1.3 Substantial Harm Criteria Certification [40 CFR 112.20]

Facility Name: General Motors Parma Complex
5400 Chevrolet Boulevard
Parma, Ohio 44130

If the answer to one or more of the following questions is yes, the facility is required to implement a Facility Response Plan (FRP) under the requirements of 40 CFR 112.20. If all answers are no, an FRP is not required and this form should be signed and inserted into Appendix A, Table A-9. Every five years, the Certification of Substantial Harm should be re-certified as part of the triennial inspection to indicate no change in the status of the site regarding 40 CFR 112.20.

Does the facility transfer oil over water to or from vessels (ships) and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation within any above ground oil storage tank area?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

YES _____ NO _____

Does the facility have a total oil storage capacity greater than or equal to one 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 five years?

YES _____ NO _____

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.

_____ _____
Print Name Title

_____ _____
Signature Date

On plant letterhead

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Date:

SAMPLE

Duty Officer
National Response Center
Commandant G-TGC-2
2100 Second St. SW
Washington D.C., 20593

RE: Report No._____

Dear Duty Officer *name*

This letter confirms the telephone notification made by *name* on *date* at *time*. Additional notifications were also made to *state* and *local agencies* immediately following the call to you.

On October 1, 1893, at 10:00 am two barrels of oil were spilled during unloading at the General Motors Horseless Carriage Assembly Plant. The oil flowed to the nearest storm basin which drains into the Call Drain. Responding personnel immediately used shovels, sandbags and a boom to prevent oil from reaching the Flint River.

The amount of oil remaining in the ruptured barrels was approximately 50 gallons. The amount of oil contained and recovered from the spill site was approximately 10 gallons. It is estimated that approximately 40 gallons reached Call Drain. The recovered oil will be shipped to a reclamation center across town.

Neighboring cattle ranchers were notified of the incident and advised not to allow their animals near the Call Drain until General Motors and its contractors can completely remediate the site. General Motors will continue to monitor Call Drain and Flint River on a daily basis. Cleanup personnel will be available during the next rain event.

The following information summarizes the report as given to Duty Officer *name*.

Name of person reporting incident:

Thomas Q. Edison

Name, address and identification number of facility:

General Motors - Horseless Carriage Assembly
2238 W. Bristol Rd.
Flint, MI. 48553

Phone number where person reporting the spill can be reached:

810-555-4450

Date, time and location of incident:

October 1, 1893
10:00 am
North of assembly plant next to powerhouse.

Quantity and type of material released:

Approximately 50 gallons of oil

Extent of injuries, if any: **None**

Brief description of incident, nature of hazardous material involvement, and possible threats to human health and the environment outside the facility:

See narrative on page 1 of this report.

The following corrective actions will be implemented immediately. A review of the standard operating procedures will be reviewed with all loading/unloading personnel. General Motors will place containment equipment near material transfer areas.

If you have any questions or concerns relative to this matter, please contact *plant environmental engineer* at *phone number*.

Thank you for your attention to this matter.

Sincerely,

Plant Manager

IMMINENT OR ACTUAL SPILL/RELEASE DISCOVERED

NOTIFY IMMEDIATELY

PLANT SECURITY (216) 265-5555

NOTIFY IMMEDIATELY

PRIMARY EMERGENCY COORDINATOR OR DESIGNATED ALTERNATE (*)

DIANE PALMER (216) 265-5391

NOTIFY IMMEDIATELY

ALTERNATE EMERGENCY COORDINATOR

ROBERT BOWSER (216) 265-5390

NICOLE MISTERKA (216) 265-5895

IDENTIFICATION OF SPILL/RELEASE

IS THE ACTUAL OR IMMINENT EMERGENCY SITUATION OF SUFFICIENT MAGNITUDE TO REQUIRE ASSISTANCE FROM OUTSIDE AGENCIES WITH DESIGNATED RESPONSE ROLES?

NO → STOP

YES

NOTIFY THE FOLLOWING AS NECESSARY:

PARMA FIRE DEPARTMENT (911)
PARMA POLICE DEPARTMENT (911)

IF INJURIES ARE EXPECTED NOTIFY:
SOUTHWEST GENERAL HEALTH CENTER (216) 826-6888

FLOW MODIFICATION REQUIREMENTS OUTLINED UNDER THE APPROPRIATE HEADINGS BELOW

PCB RELEASE (TSCA)

WITHIN 30 MINUTES NOTIFY OHIO EPA, CENTRAL OFFICE - COLUMBUS, OHIO 1-800-282-9378
AND
LEPC (216) 771-1365

IF A PCB TRANSFORMER IS INVOLVED IN A FIRE RELATED INCIDENT NOTIFY NATIONAL RESPONSE CENTER 1-800-424-8802

IF A SPILL DIRECTLY CONTAMINATES SURFACE WATER, SEWERS, OR DRINKING WATER SUPPLIES OR IF THE SPILL IS EQUAL TO OR EXCEEDS 10 LBS. BY WEIGHT OF PCB MATERIAL NOTIFY WITHIN 24 HOURS (OR 48 HOURS IF A PCB TRANSFORMER):

NATIONAL RESPONSE CENTER 1-800-424-8802
AND
EPA REGION V TOXIC SUBSTANCES BRANCH EMERGENCY RESPONSE UNIT (312) 353-2318

FOLLOW THE SPILL CLEAN-UP PROCEDURES OUTLINED UNDER THE REQUIREMENTS SECTION OF THE ENVIRONMENTAL SPILL/RELEASE RESPONSE PLAN

ALSO SEE NOTIFICATION REQUIREMENTS OUTLINED UNDER THE HAZARDOUS SUBSTANCE RELEASE HEADINGS

HAZARDOUS WASTE RELEASE (RCRA)

WITHIN 15 MINUTES NOTIFY OHIO EPA, CENTRAL OFFICE - COLUMBUS, OHIO 1-800-282-9378
AND
LEPC (216) 771-1365

HAS THE FACILITY HAD A RELEASE, FIRE OR EXPLOSION WHICH COULD THREATEN HUMAN HEALTH OR THE ENVIRONMENT OUTSIDE THE FACILITY? NO

YES

IMMEDIATELY NOTIFY:
NATIONAL RESPONSE CENTER 1-800-424-8802

ALSO SEE NOTIFICATION REQUIREMENTS OUTLINED UNDER CERCLA HAZARDOUS SUBSTANCE AND SARA EXTREMELY HAZARDOUS SPILL/RELEASE HEADING

WITHIN 15 DAYS OF THE INCIDENT, SUBMIT A WRITTEN SPILL REPORT
AND
IF FROM A HAZARDOUS WASTE TANK, WITHIN 30 DAYS OF THE INCIDENT, SUBMIT ADDITIONAL INFORMATION AS NOTED ON THE SPILL REPORT TO:
US EPA
REGIONAL ADMINISTRATOR

WITHIN 30 DAYS OF THE INCIDENT, SUBMIT A WRITTEN SPILL REPORT TO:
OHIO EPA, DERR-ER
ATTN: DUTY OFFICER
SPILL REPORT
AND
CUYAHOGA COUNTY LEPC
EMERGENCY COORDINATOR

OIL SPILL (SPCC AND OR RCRA IF FROM U.S.T.)

WITHIN 15 MINUTES NOTIFY OHIO EPA, CENTRAL OFFICE - COLUMBUS, OHIO 1-800-282-9378
AND
LEPC (216) 771-1365

IS THE RELEASED MATERIAL FROM AN UNDERGROUND STORAGE TANK (U.S.T.) NO

YES

WITHIN 24 HOURS NOTIFY:
OHIO DEPARTMENT OF COMMERCE - DIVISION OF STATE FIRE MARSHALL 1-800-886-2878
THIS NOTIFICATION MUST BE MADE FOR A SPILL/RELEASE GREATER THAN 25 GALLONS WHICH WAS NOT CONTAINED AND CLEANED WITHIN 24 HOURS

DOES THE SPILL CAUSE A SHEEN ON NEARBY SURFACE WATER? NO

YES

WITHIN 20 DAYS AFTER THE RELEASE, SUBMIT A REPORT SUMMARIZING INITIAL ABATEMENT STEPS TAKEN
AND
WITHIN 180 DAYS OF RELEASE CONFIRMATION SUBMIT AN INITIAL SITE CHARACTERIZATION REPORT.
SUBMIT THESE REPORTS TO:
CUYAHOGA COUNTY LEPC
EMERGENCY COORDINATOR
BANK ONE BUILDING, SUITE 102
1255 EUCLID AVENUE
CLEVELAND, OH 44115

WILL OIL SPILL/RELEASE REACH NAVIGABLE BODY OF WATER? NO

YES

IMMEDIATELY NOTIFY:
NATIONAL RESPONSE CENTER 1-800-424-8802

IF SPILL\RELEASE REACHES CITY STORM OR SANITARY SEWER, NOTIFY:
NORTHEAST OHIO REGIONAL SEWER DISTRICT
(216) 641-6000 8:00A - 4:30P M-F
(216) 641-3200: ANY OTHER TIME

WITHIN 30 DAYS OF THE SPILL/RELEASE, FILE A REPORT WITH THE OHIO EPA, DERR-ER
AND
CUYAHOGA COUNTY LEPC
EMERGENCY COORDINATOR

IF SPILL IS GREATER THAN 1000 GALLONS OR THIS IS THE SECOND SPILL WITHIN 12 MONTHS, SUBMIT SPCC PLAN TO US EPA, REGIONAL ADMINISTRATOR: THOMAS V. SKINNER, 230 SOUTH DEARBORN, CHICAGO, IL 60604

HAZARDOUS SUBSTANCE RELEASE (CERCLA) OR EXTREMELY HAZARDOUS SUBSTANCE RELEASE (SARA TITLE III)

IS THE RELEASED MATERIAL A CERCLA DESIGNATED HAZARDOUS SUBSTANCE OR MIXTURE, OR A SARA EXTREMELY HAZARDOUS SUBSTANCE OR MIXTURE? NO → STOP

YES

IS THE RELEASED QUANTITY GREATER THAN OR EQUAL TO THE REPORTABLE QUANTITY (RQ)? NO

YES

IMMEDIATELY NOTIFY:
NATIONAL RESPONSE CENTER 1-800-424-8802

WITHIN 15 MINUTES NOTIFY:
OHIO EPA, CENTRAL OFFICE - COLUMBUS, OHIO 1-800-282-9378
AND
LEPC (216) 771-1365

AFTER THE RELEASE, SUBMIT A WRITTEN FOLLOW-UP EMERGENCY NOTICE (OR NOTICES), AS SOON AS MORE INFORMATION IS/COMES AVAILABLE

IS THE RELEASED MATERIAL FROM AN UNDERGROUND STORAGE TANK (U.S.T.)? NO → STOP

YES

ALSO SEE NOTIFICATION REQUIREMENTS UNDER OIL SPILLS

ENVIRONMENTAL ENGINEERING
ROBERT BOWSER PHONE: (216) 265-5390
DIANE PALMER PHONE: (216) 265-5391

MAINTENANCE DEPARTMENT
A. FIRST SHIFT
PHONE: 5560
PAGER:
B. SECOND SHIFT
PHONE: 5560
PAGER:
B. THIRD SHIFT
PHONE: 5560
PAGER:

OUTSIDE CLEAN-UP CONTRACTORS (IF NECESSARY)

ROBINSON PIPE SERVICE (216) 277-7473
LAKELAND WATERS (216) 881-5848

PROVIDE FOR CONTAINMENT AND RECOVERY OF SPILL/RELEASED MATERIAL

NOTIFY PLANT MANAGEMENT STAFF

CORPORATE NOTIFICATION (GENERAL MOTORS)

WFG-ENVIRONMENTAL SERVICES

GENERAL MOTORS LEGAL STAFF

	GENERAL MOTORS CORPORATION PARMA PLANT PARMA, OHIO	EXTERNAL/INTERNAL NOTIFICATION FLOWCHART	DATE APR 2003 / APPENDIX B

TANK TRUCK LOADING/UNLOADING PROCEDURE

1. Insure that tank trailer is accurately spotted at the proper loading/unloading spot.
2. Tank trailer brakes will be set, and the driver will remain with the vehicle during the entire loading/unloading period.
3. Caution signs bearing the words "Stop-Tank Trailer Connected" will be placed in the vicinity of the tank trailer to give necessary warning to approaching personnel and must be left up until after tank truck is loaded/unloaded and disconnected from discharge connection.
4. Loading/unloading operations shall be performed only by reliable persons properly instructed and made responsible for careful compliance with applicable regulations.
5. Loading/unloading of tank trailers will be done during daylight hours except under emergency conditions.
6. No open flame of any kind shall be permitted, for any purpose whatsoever, near the tank trailer or within the vapor area surrounding the tank trailer. Smoking is strictly forbidden within this area. Only spark proof tools will be used.
7. Make sure the permanent storage tank is vented before connecting the unloading line.
8. Determine by tap sounding and/or King gauge sounding of receiving storage tank that sufficient space is available in storage tank to receive contents of the tank trailer.
9. Tank trailer number is to be compared with that on shipping papers on invoice to determine contents of trailer and avoid mixing of products.
10. To verify tank trailer contents, a sample will be withdrawn and material identified by Powerhouse personnel. Sample will be secured by:
    A. Insure that tank trailer is relieved of all interior pressure by venting tank by opening vent on dome at short intervals.
    B. After relieving pressure, open manhole cover and obtain sample through the manhole.
11. Attach ground strap (plant) to bumper of tank trailer.
12. Remove closure from valve through which tank trailer is to be unloaded after placement of catch basin is in position to catch any liquid that may be in the outlet chamber.
13. If leakage shows upon starting to remove cap, cap must not be entirely unscrewed, but sufficient threads must be left engaged and sufficient time allowed to permit escape of any accumulation of liquid in the outlet chamber. If leakage stops or initial rate of leakage diminishes materially, the cap may be entirely removed. If initial rate of leakage continues, valve must be actuated a couple of times to see that outlet valve in bottom of tank is on seat. If this fails, the cap must be screwed up tight and trailer must be unloaded through top manhole.
14. After removing cap, visually inspect the outer chamber to insure that no blockage exists. If blockage does exist, immediately replace cap and unload trailer from the top.
15. Attach unloading line to the proper connection on the outlet leg.
16. Open bottom outlet valve and proper valves in the unloading lines.

17. Start pump, checking to insure that there is no leakage at any of the connections. Should leakage be present, immediately stop the pump.
18. After liquid has been removed, stop pump, close all valves, disconnect plant unloading line from tank trailer, replace cap to outlet and make all other closures tight.
19. Remove all portable signs and release trailer.

SPILL DISCOVERY AND NOTIFICATION PROCEDURE

What is an emergency?

- An emergency is anything out of the ordinary, not related to normal working conditions.

REPORTING

A spill is reported in one of three ways:

- Security is notified of spill. Security starts documentation procedure and notification requirements.
- Maintenance office is notified of a spill. Maintenance personnel should notify security that a spill has been reported. Security then starts documentation procedure and notification requirements.
- Dispatch is notified of a spill. Dispatch personnel should notify security that a spill has been reported. Security then starts documentation procedure and notification requirements.

A spill of any substance does not need to be large in quantity to be considered unsafe.

Anytime a spill (large or small) is detected, the employee or supervisor must call security and report that a spill has been detected.

EMPLOYEE AND SUPERVISOR RESPONSIBILITIES

If a spill is discovered, the employee or supervisor will:

- Evacuate the area and notify other employees to do the same until directed by security that it is safe to occupy the area.
- Call security after moving to a safe area.
- Give as much information about the spill to security and/or Emergency Coordinator as possible.

The following information should be related to security and/or Emergency Coordinator:

- Specific location of the spill.
- Your name and where you are calling from.
- Identify material spilled if known.
- Estimated amount of spilled material.
- Type and condition of container.
- Number of personnel in spilled area, or indicate that the spilled area has been evacuated.
- Are there any injured personnel in the spilled area?
- Stay in area and report to security when security arrives at spilled area.

Secondary information:

- Brief description of the events leading to the spill incident, and any obvious threatening effects.
- Any control actions taken.

SECURITY

After receiving notification of a spill, security will start documentation, notification procedures and respond to the area.

Departments to be notified are:

- Fire Brigade
- Health and Safety
- Environmental
- Personnel office in the event of a Level III Response.

Security will confirm that the area has been evacuated and no employees are in any danger from the spilled material.

Security will physically isolate the area from all other employees and industrial traffic.

After the Emergency Coordinator arrives at the spilled area, security will support the Emergency Coordinator.

EMERGENCY COORDINATOR
After the Emergency Coordinator arrives at the spill area, he/she will determine the level of spill response.

The levels of spill response are Levels 1, 2 or 3.

Safety is the main concern of the Emergency Coordinator. The Emergency Coordinator will not commit any team member to a situation that would jeopardize their health and safety.

During a spill response, the Emergency Coordinator and the spill safety officer will determine the best method of mitigating the spill. The Emergency Coordinator will hold a briefing of all team members. If any member feels that their health and safety will be compromised they are not required to enter the spill area. Members of the spill team must be in complete agreement on the tactics before entry can begin.

AREAS FOR IMMEDIATE CONTROL
- Areas that will be rapidly overtaken by the spill.
- Key locations that control vehicle and pedestrian traffic patterns.
- Designated safe location where displaced employees can report.

LEVEL OF RESPONSE
1. Response Protocol #1
Response protocol #1 is the lowest level of response to a spill. It is the response to a small or incidental spill.

An example of a Response Protocol #1 spill:
- • A flammable liquid that does not present an immediate hazard.
- • A corrosive spill that is not creating vapors, can be absorbed and does not require neutralization.

Minimum staffing for Response protocol #1.
Security officer
One Emergency Coordinator
One Spill Safety Officer
One or two spill technicians, depending on the amount and location of the spill.
Respirators may be worn with this level when the physical conditions demand respirator

use. Personal protective equipment will conform to the MSDS and Safe Use Instructions.
Support departments as required.

2. Response Protocol #2

A Response Protocol #2 involves the full spill team. Specialized personal protective equipment, and respirators are required for this level of response.

The Emergency Coordinator will establish work zones. Formal entry and decontamination lines will be established.

Minimum staffing for a Response protocol #2.

A. One or more security officers
B. One Emergency Coordinator
C. Full Spill Response Team. (Seven team members)
    i. Two entry team members
    ii. Three decontamination team members
    iii. Two back up team members.
D. One Spill Safety Officer.
E. One medical department personnel
F. One environmental department personnel
G. Other department personnel as required

3. Response Protocol #3.

A Response Protocol #3 outstrips the resources of Lordstown Fabrication Plant.

This level of response is to be used very carefully, as anytime an outside agency is involved, outside media will also respond and you may have a larger problem on your hands than just mitigating the spill.

Minimum staffing requirements for a Response Protocol #3 are the same as for a Response Protocol #2.

The personnel department will designate a media room where all information about the spill will be transmitted to the news media.

The personnel department will designate a spokesperson to meet and answer outside media's questions. The spill response will keep the spokesperson informed of developments.

Security will limit access to the site and usher all news media to the media room.

Security will man all access points to the plant to prevent news media from entering the plant beyond the administration building.

DECONTAMINATION PROTOCOLS

Decontamination is required on all levels of response, Decontamination protocols help the Emergency Coordinator in reducing the decisions and information needed to decontaminate their personnel effectively.

The three decontamination protocols are as follows:

Decontamination Protocol #1

- Decontamination protocol #1 is used primarily for a Response Protocol #1.
- This protocol is a self-decontamination procedure.

Decontamination Protocol #2

- Decontamination protocol #2 is used where Response Protocol #2 or #3 are required.
- A formal decontamination line is established and a decontamination fluid (solution of detergent and water) is used to decontaminate all personnel leaving the decontamination line.

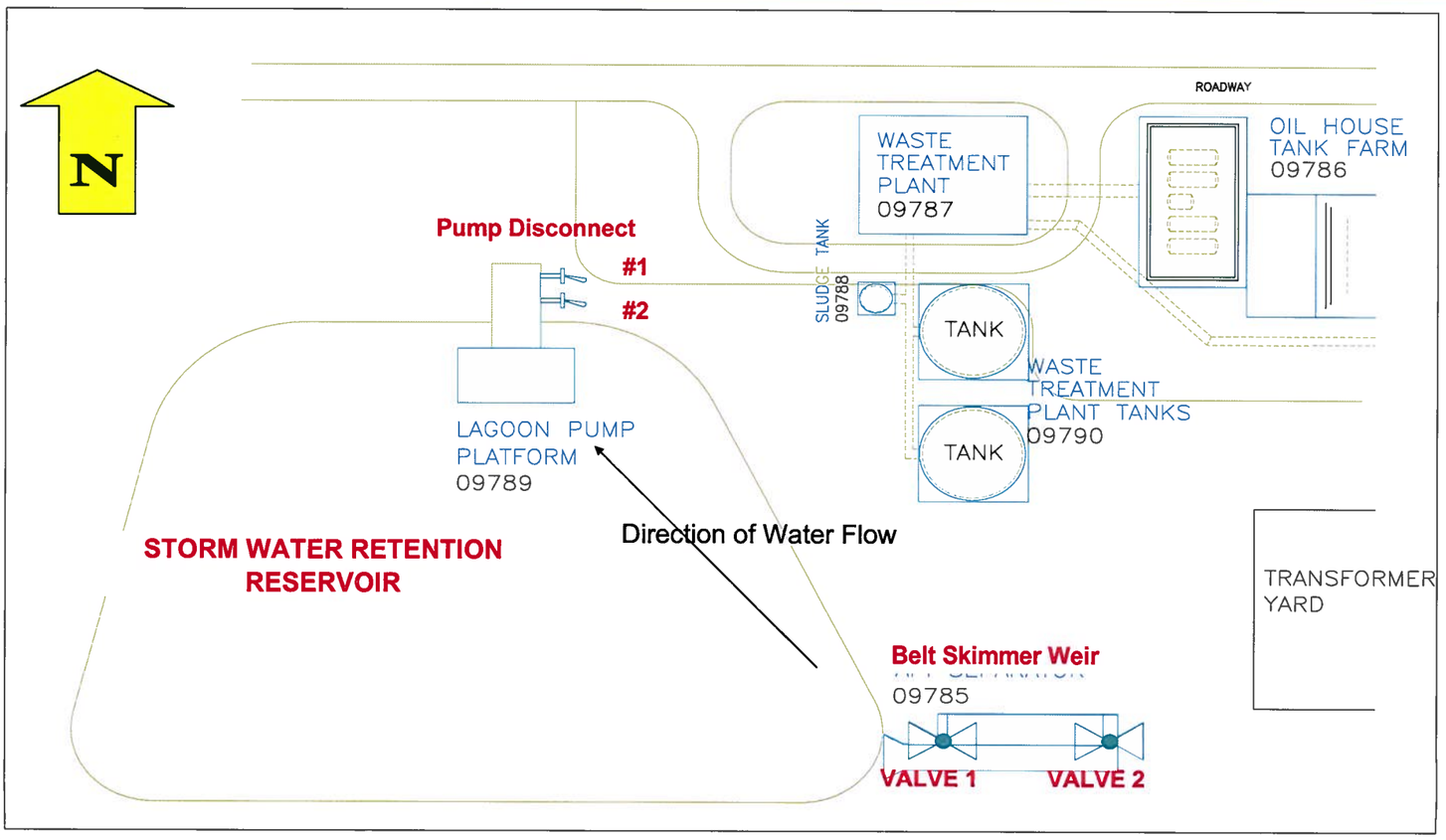
Decontamination Protocol #3

- Decontamination protocol #3 is applied where a Response Protocol #3 is required and the chemicals require a fluid other than detergent for decontamination.

MSDS sheets indicate what decontamination fluid is required.

EMERGENCY SHUT DOWN OF STORM WATER BELT SKIMMER WEIR & RETENTION RESERVOIR

TO BE USED IN CASE OF OIL, COOLANT OR CHEMICAL SPILL. THIS PROCEDURE WILL ISOLATE A SPILL CAPTURED IN THIS SYSTEM TO THE GM PARMA PROPERTY



#1	**Close valve #1 at west end of belt skimmer weir.**
#2	**Open disconnect on pumps #1 & #2 at north end of storm water retention reservoir**

FURTHER DETAILS FOR SPILL ENTERING STORM SEWERS PRIOR TO RESEVOIR

Valve #2 - at east end of belt skimmer weir remains open as long as inflow is visually contaminated.
Set up and pump all spill material out of the contaminated storm water catch basins.
After as much of the spill has been recovered as possible, flush catch basin with water.
After it is determined that spill has been flushed out of storm sewer system that enters belt skimmer weir, close valve #2 at east end of belt skimmer weir.
If the material spilled is compatible with Waste Treatment Plant capabilities, e.g. not flammable, pump contaminated water from the belt skimmer weir to Waste Treatment Plant.
This is best done by using a three inch gas pump and lay-flat hose.
WFG-Environmental or WFG-Utilities will make a compatibility determination.
Pump any spill material that has passed into the storm water retention reservoir to Waste Treatment Plant

FOR SPILLS ENTERING STORM SEWER DOWNSTREAM OF STORM WATER RETENTION RESERVOIR

If spill is downstream of storm water retention reservoir pumps and upstream of H-100 Lift Station.
Open disconnect on pumps #1 & #2 at the storm water retention reservoir and at H100 lift station.
Pump any spill material out of catch basins.
After as much of the spill has been recovered as possible, flush catch basin with water.
After it is determined that spill has been flushed out of storm sewer entering H-100 lift station, pump out the lift station. This is best accomplished by using a vacuum tanker truck.
Determine if spill exited H-100 lift station prior to pumps being shut down. See below.
PLEASE NOTE: If the spill is downstream of the H-100 lift station, shut off pumps at reservoir and lift station.
At this point spill will gravity flow through Brookpark Rd. API Separator and out through creek.
If spill is insoluble oil, place booms at creek. Pump out at API Separator.