SPILL PREVENTION CONTROL AND COUNTERMEASURE

AND

RCRA CONTINGENCY PLAN

UNIVAR SOLUTIONS, LLC

FREEPORT CENTER, BUILDING 12

CLEARFIELD, UTAH 84016

EPA IDENTIFICATION NUMBER: UTD048406144

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN AND RCRA CONTINGENCY PLAN

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*Note: NA = not applicable to the Clearfield facility.

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Final SPCC Rule	Description of Section	Section
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*Note: NA = not applicable to the Clearfield facility.

CROSS REFERENCE LIST (continued) – 40 CFR 112.7

Final SPCC Rule	Description of Section	Section
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*Note: NA = not applicable to the Clearfield facility.

1.0 MANAGEMENT CERTIFICATION

Univar Solutions, LLC
Freeport Center, Building 12
Clearfield, Utah 84016

EPA Identification Number UTD048406144

Management Certification: This SPCC and RCRA Contingency Plan is fully approved by the management of Univar and has been implemented as described herein:

Signed:_____
Steve Hesla
Director of Operations

Date:_____

2.0 DESIGNATED AGENT (FACILITY MANAGER) CERTIFICATION

Univar Solutions, LLC
Freeport Center, Building 12
Clearfield, Utah 84016

EPA Identification Number UTD048406144

Designated Agent Certification: By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that as the designated agent of the P.E., I have visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required inspections and testing have been established and that the Plan is adequate for the facility.

Designated Agent Signature:_____

Michael Hahn
Facility Manager

Date:_____

3.0 P.E. CERTIFICATION

Univar Solutions, LLC
Freeport Center, Building 12
Clearfield, Utah 84016

EPA Identification Number UTD048406144

P.E. Certification:

By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that the Facility Manager, as my designated agent has visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required inspections and testing have been established and that the Plan is adequate for the facility as described by the Facility Manager.

P.E. Signature:_____

Print Name: Edward C. Graves, P.E.

Registration No.: 55621 State: OH

Date:_____

4.0 SCOPE AND APPLICABILITY -

This SPCC and RCRA Contingency Plan, as a part of the facility's RCRA Part B Permit, describes the facility's response to a fire, explosion, or release to the environment of oil or hazardous waste. This plan is designed to minimize hazards to human health or the environment from fires, explosions, or releases. Any deviations of this Plan from the SPCC rules and regulations are included in Appendix D. This plan does not follow the sequence specified in the SPCC regulations and therefore, a Cross Reference List was prepared to conveniently identify the required regulatory information in this Plan. The Cross Reference List begins on page i of this document.

Spill Prevention, Control, and Countermeasure (SPCC) plans for facilities are prepared and implemented as required by the U.S. Environmental Protection Agency (EPA) Regulations contained in Title 40 of the Code of Federal Regulations (CFR) Part 112. A non-transportation related facility is subject to SPCC regulations if: the aggregate aboveground capacity of the facility exceeds 1,320 gallons (excluding those tanks and oil filled equipment below 55 gallons in capacity) or if the aggregate underground capacity of the facility exceeds 42,000 gallons (excluding those that are currently subject to all of the technical requirements of 40 CFR Part 280 or all of the technical requirements of state programs approved under 40 CFR Part 281); and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters or adjoining shorelines of the United States.

The EPA does not require a SPCC Plan to be filed with the agency. However, a copy must be available for on-site review by the Regional Administrator (RA) during normal working hours. The SPCC Plan must be submitted to the EPA Regional Administrator and the state agency along with the other information specified in 40 CFR 112.4(a) if either of the following occurs:

1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single spill event which violates applicable water quality standards or cause a film, sheen, or discoloration or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or

2. The facility discharges oil in quantities greater than 42 gallons in each of two spill events within any 12-month period which violate applicable water quality standards or cause a film, sheen, or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

The following spill information must be submitted to the RA within 60 days if either of the above thresholds is reached. This report is to contain the following information (40 CFR 112.4 (a)):

1. name of the facility
2. name of the individual submitting the information
3. location of the facility
4. maximum storage or handling capacity of the facility and normal daily throughput
5. corrective actions and/or countermeasures taken, which include an adequate description of equipment repairs and/or replacements
6. description of the facility including maps, flow diagrams, and topographical map
7. cause(s) of such spill(s), including a failure analysis of system or subsystem in which failure occurred
8. additional preventive measures taken or contemplated to minimize the possibility of recurrence
9. other information as the Regional Administrator may reasonably require that is pertinent to the plan or spill event(s)

In addition to submitting the report to the RA, the report will also be submitted to the state and local agencies listed in Appendix A.

The SPCC Plan and RCRA Contingency Plan must be reviewed and amended as required by 40 CFR 112, , and R315-264-54. Review and amendment requirements are included in Section 13.

If the owners and operators of a facility that are required to prepare an SPCC Plan and are not required to submit a Facility Response Plan (FRP), the SPCC Plan should include a signed certification form, provided in Appendix E of this Plan (per Appendix C to 40 CFR 112).

5.0 FACILITY INFORMATION, DESCRIPTION AND OPERATIONS -

The facility's street address is:	Univar Solutions, LLC (Univar) Freeport Center, Building 12 Clearfield, Utah 84016
The facility's mailing address is:	Univar Solutions, LLC P.O. Box 160367 Clearfield, UT 84016
Owner (note: Univar leases the facility from Freeport Center Associates):	Univar Solutions, LLC 3 Waterway Square Place, Suite 1000 The Woodlands, Texas 77380
Facility Contact:	Michael Hahn Facility Manager 801-776-1295

The facility's operations include storage, blending, packaging and transportation of chemicals and solvents for wholesale distribution and storage of hazardous waste. The property is bordered to the north, south, east, and west by light industrial and commercial facilities, located within the Freeport Center industrial park. The nearest water body is the Davis-Weber Canal located approximately 5-miles northeast of the property.

Refer to the facility diagram (i.e., plot plan) in Appendix B for the location of the storage tanks and the physical layout of the facility. Also provided on this diagram are storm water drain inlets and flow (i.e., slope) directions of storm water and spilled oil paths. As required under 40 CFR 112.7(a)(3)(i), this facility diagram indicates the location of each container storage area. Also included are all transfer stations and connecting piping, if applicable. There have been no underground storage tanks on the property since 1985.

5.1 Fixed and Mobile Storage of Oil (40 CFR 112.7(a)(3)(i)):

Container	Product	Capacity (gallons)	Construction Material	Secondary Containment	Location
Tank 106	Light Solvents	10.5 M	Carbon Steel	Concrete dike	Tank farm
Tank 107	Hexane	29.6	Carbon Steel	Concrete dike	Tank Farm
Tank 108	Mineral Spirits	29.8 M	Carbon Steel	Concrete dike	Tank farm
Railcars	Various Solvents and Oils	2 x 30 M gallons	Carbon Steel	Catch Pan and retention basin, top unloading, dike around pump	Railcar unloading area
Tank Trucks	Various Solvents and Oils	6 M	Carbon, Stainless Steel	Truck Rack pit and curbing	Truck Rack
Totes	Various Solvents and Oils	50 * 350 gal = 17.5 M gal	Poly / Stainless Steel	Concrete floor, curbing	Building J10
Drums	Various Solvents and Oils	1400 * 55 gal = 77 M gal	Poly / Stainless Steel	Concrete floor, curbing	Building J10
Totes	Various Solvents and Oils	60 * 350 gal = 21 M gal	Poly / Stainless Steel	Concrete floor, curbing	Building 12
Drums	Various Solvents and Oils	700 * 55 gal = 38.5 M gal	Poly / Stainless Steel	Concrete floor, curbing	Building 12

*Note: M = 1,000-gallons

Total regulated oil storage capacity: 289.9 M gallons

Remaining tanks hold non-regulated solvents and water-based materials.

6.0 SITE DRAINAGE

Refer to the site plot plan (Appendix B) for reference to facility drainage. The site is essentially flat. Surface drainage in the operational area flows diagonally across the site in a southwestern direction. Any unintentional surface spill outside of a diked area would, under most conditions, be contained on the property.

Storm water runoff from the roadway is prevented from entering the facility via a drainage trench installed along the facility's northern boundary. This drainage trench diverts water to a storm sewer outside the facility.

The elevation of the existing pavement located 30 feet east of the dry well is the same as the elevation of the hazardous waste storage pad's containment wall. A 4-foot wide by 160-foot long concrete waterway prevents storm water from running into the new pad. The waterway starts at the southeast corner of the waste pad and goes through and past the dry well. It angles northwest, and then turns and runs west along the building. It ends in a natural swale. The lot is graded such that precipitation runs away from the building.

Removal of accumulated clean rainwater from diked areas is performed only under responsible supervision to assure that the facility will not violate any water quality standards. Storm water is removed using manual pumps; there are no drain valves in the dikes.

Rail catch pans have been added under the rail cars and the unloading arms. These pans will catch releases from the rail car unloading system. The catch pans are not equipped with valves, so storm water that falls into the catch pans will be discharged directly into the retention basin.

The retention basin is located in the northwest corner of the property. It is a compacted clay-lined basin designed to hold spilled material from the rail car unloading area and some stormwater run off. The basin was designed to hold the contents of a 30,000 gallon rail car, and a 25 year / 24 hour storm event. Most of the stormwater from the facility is directed to the storm sewer outside the facility. Storm water that falls inside the spill containment areas will go to the retention basin.

Spilled material will be pumped out of the retention basin and placed into drums. Impacted soil will be removed, characterized, and managed in accordance with R315.

Containment berms run between the concrete waterway and the hazardous waste loading docks. These berms keep spills away from the storm water drainage. They have been designed to direct the spill to the retention basin.

The facility is not currently required to have a National Pollutant Discharge Elimination System (NPDES) Permit for storm water discharges.

7.0 POTENTIAL SPILLS AND CONTROL

Source	Major Failure Type	Max Potential Quantity	Probable Rate	Flow Direction*	Secondary Containment
Hazardous waste drum storage area	Puncture or rust	55 gallons	Released gradually to instantaneously	Within storage shed or building	Storage shed, impervious concrete floor, curbs
Bulk storage tanks	Complete or partial failure of bulk tank	30,000 gallons	Gradual to instantaneous release	Within dike	Tank farm dike
Tank overflow	Overfill of tank from tank truck	8,500 gallon tank trailer capacity	250 gallons per minute (gpm)	Within dike	Tank farm dike
Tank truck unloading and loading	Line rupture, hose coupling disconnection, or overfilling, tank failure	8,500 gallon tank trailer capacity	250 gpm	Within curbed area	Curbs, drip pans, absorbent materials
Solvent drumming area	Overfill, Equipment breakdown	55 gallons	Gradual release to 60–100 gpm	Within curbed area	Curbs, absorbent material
Railcar unloading	Break in hose, pipe fitting, bottom valve failure on car	30,000 gallons	225 gpm	Within catch pans and retention basin	Rail catch pans, retention basin
Drum storage areas	Puncture or failure	55 gallons	Gradual release	Within curbed area	Curbs, absorbents, Impervious concrete floor
Product storage areas – building 12	Container puncture or failure	55 gallons	Gradual release	North	Absorbents, Impervious concrete floor

Source	Major Failure Type	Max Potential Quantity	Probable Rate	Flow Direction*	Secondary Containment
J10 warehouse	Puncture or failure	55 gallons	Gradual release	Within curbed area	Curbs, absorbents, impervious concrete floor

* See Appendix B for locations of the containers.

8.0 DESIGN & OPERATING INFORMATION

This facility conforms to the following design and operating standards.

Drainage from Diked Areas

Dikes are provided around the tank farm, which stores multiple solvents. The dikes are constructed of impervious concrete. Drainage from the tank farm is controlled by a portable pump which is manually operated. An earthen dike has been constructed around the perimeter of the entire facility.

The dike is pumped under responsible supervision. The accumulated material is examined visually before draining to be sure that no oil will be discharged. The pump is secured following drainage.

Curbing is used in the loading and unloading area for tank trucks, the drum storage area, drumming area, waste pad, and warehouse to provide secondary containment. The curbed areas are not fitted with valves. Rainwater collected in the curbed area in front of the hazardous waste loading dock is directed to the retention basin. It will be pumped out after verifying that there are no contaminants from leaking storage tanks or containers. Rainwater from all other curbed areas is visually inspected, pumped over the curb, and allowed to flow towards the southwest corner of the site. The rail car area is equipped with rail catch pans, which direct all spills and stormwater to the retention basin.

The retention basin is sized to contain 30,000 gallons of spilled material - equivalent to the capacity of the largest single tank car received at the facility – plus a volume of precipitation equivalent to a 25-year, 24-hour storm event. The retention basin is constructed of compacted clay which has a porosity of 1×10^{-6} cm/sec. This provides a containment material that is sufficiently impervious to contain a spill of SPCC regulated material until it can be cleaned up. The criteria used for this determination is 72 hours as the maximum time a spill would need to be contained until it could be cleaned up. This presumes a worst case scenario of a spill occurring after hours on a Friday evening and remaining undetected until the following Monday. Based on the least viscous oil product managed on-site, a spill would be expected to migrate into the compacted clay liner no more than two inches in 72 hours. This will easily prevent a spill from migrating to off-site water bodies or into groundwater beneath the site until the spilled material can be removed. Thus, the compacted clay liner provides a sufficiently impervious barrier to hold a spill until the material can be removed.

Calculation of Retention Basin Capacity

Volume of largest container = 30,000 gallon rail car
Maximum rainfall, 25 year – 24 hour event = 2.50 inches
Surface area of rainfall = 13,111 ft^2
Total volume of rain = 20,400 gallons
Total retention volume required = 50,400 gallons
Total retention volume provided = 58,786 gallons

Tank Farm Capacity Calculations

Dike Capacity

L (ft) x	W (ft) x	Dike wall H (Ft) x	Gal/cubic ft	Total (Gal)
78.75	75	1.58	7.48	69082

24hr Annual Rainfall

L (ft) x	W (ft) x	H (avg rainfall/ft) x	Gal/sq ft	Total (Gal)
78.75	75	0.208	7.48	9189

Tank Displacement

Tank #	Radius x	Radius x	Dike wall H (Ft)- pad x	PI x	Gal/sq ft	Total
101	5	5	1	3.14	7.48	587
102	5	5	1	3.14	7.48	587
103	5	5	1	3.14	7.48	587
104	5	5	1	3.14	7.48	587
105	5	5	1	3.14	7.48	587
106	5	5	1	3.14	7.48	587
107	6	6	1	3.14	7.48	846
108	6	6	1	3.14	7.48	846
109	5	5	1	3.14	7.48	587
110	5	5	1	3.14	7.48	587
111	5	5	1	3.14	7.48	587
112	6	6	1	3.14	7.48	846
113	6	6	1	3.14	7.48	846
200	5	5	1	3.14	7.48	587
201	3.5	3.5	1	3.14	7.48	288

Tank Pad Displacement

Tank #	L x	W x	H (pad/inches) x	Gal/sq ft	Total
101	11.5	11.5	0.416	7.48	412
102	11.5	11.5	0.416	7.48	412
103	11.5	11.5	0.416	7.48	412
104	11	11	0.416	7.48	377
105	11	11	0.416	7.48	377
106	11	11	0.416	7.48	377
107	13	13	0.416	7.48	526
108	13	13	0.416	7.48	526
109	11	11	0.416	7.48	377
110	11	11	0.416	7.48	377
111	11	11	0.416	7.48	377
112	13	13	0.416	7.48	526
113	13	13	0.416	7.48	526
200	11	11	0.416	7.48	377
201	9.25	9.25	0.416	7.48	266

Displacement totals	24971
Dike Capacity	69082

Required Containment

Gallons (largest tank) x	10% =	Needed containment	Available Containment
29800	1.1	**32780**	44979

Bulk Storage Containers

The facility maintains procedures for controlling the bulk storage of liquids. The tank farm is diked to contain the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation. All materials of construction are compatible with the material stored and conditions of storage, such as pressure and temperature.

All of the aboveground storage tanks are of carbon steel, stainless steel, or polyethylene construction. The tanks are compatible with the oil they contain and the temperature and pressure conditions of storage. Containers for oil storage consist of 55-gallon drums and totes, which are stored in contained storage areas. Secondary containment is provided in storage areas via curbing and absorbent material. These areas are not subject to periodic flooding.

Bulk storage tanks are equipped with gauges to prevent over filling. Standard operating procedures require that tanks not be filled to more than 85% of capacity. Before tank filling operations begin, operators verify that there is enough room in the tank to receive the entire delivery without exceeding the 85% limit. If an overfill does occur, it will be contained in the tank farm dike.

There are no field constructed aboveground tanks at this facility.

Inspections and Integrity Testing

As required by the SPCC rule, the facility performs the inspections, tests, and evaluations listed in the following table. Table 8-1 summarizes the various types of inspections and tests performed at the facility. The inspections and tests are described later in this section.

Table 8-1: Inspection and Testing Program

Facility Component	Action	Frequency / Circumstance
Portable Aboveground Containers	Visually inspect outside of containers for deterioration or leakage on a regular basis. Complete a documented monthly inspection. Utilize DOT approved drums.	Employees observe daily during normal operations. Monthly detailed inspections are documented. If leaks or deteriorated containers are observed, corrective actions shall be implemented and documented.
Fixed Aboveground Tanks	Visually inspect outside of tanks for deterioration or leakage on a regular basis. Complete a documented monthly inspection.	Employees observe daily during normal operations. Monthly detailed inspections are documented. If leaks or deteriorated containers are observed, corrective actions shall be implemented and documented.
All aboveground valves, piping and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly
Underground Tanks and Pipes	None	None
Liquid Level Measurement Gauges (overfill protection)	Ensure proper operation of gauges.	Monthly
Diked Areas	Inspect for signs of deterioration, discharges, or accumulation of oil inside diked areas. Visually inspect content for presence of oil before draining and document on log. Remove oil if observed.	Monthly Each time containment is drained.
Lowermost drain and all outlets of tank truck / tank car	Visually inspect after each transfer	Prior to filling and departure

Daily Inspection

Employees perform a complete walk-through of the facility each day. This daily visual inspection involves: looking for tank / piping damage or leakage, stained or discolored soils, or excessive accumulation of water or oil in truck docks, diked or bermed areas. Daily inspections are not documented.

Weekly Inspection

A checklist is used for weekly inspections by designated personnel. The current inspection form is available from the facility. The weekly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, or corrosion.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Checking the inventory of discharge response equipment and restocking as needed.
- Observing the truck pads and storm sewers to verify that they are free of oil.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Facility Manager and/or Supervisor. Visible oil leaks from tank walls, piping or other components must be repaired as soon as practicable to prevent a larger spills or a discharge to the soil or storm water. Pooled oil is removed immediately upon discovery. Written monthly inspection records are signed by the inspector and maintained on site for a period of three years.

Integrity Testing

Portable, Single-Use Containers (Drums and Totes)

Containers are stored on concrete floors enabling prompt detection of leaks. Therefore, visual inspections provide equivalent environmental protection and periodic testing is not required. The facility only uses drums and totes that meet the Department of Transportations Performance Oriented Packaging standards found in 49 CFR 178. This provides a measure of assurance that the container has been properly made and should not leak under normal operating conditions.

Fixed, Aboveground Storage Tanks up to 50,000 Gallons Capacity

Visual inspections and periodic shell thickness testing is conducted. Univar has formal mechanical integrity inspection and testing activities on bulk tanks. The integrity inspections are conducted as specified by the Univar Engineering Department and in accordance with 40 CFR 112.8(c)(6). Mechanical integrity inspection and test methods and intervals are based on recognized and accepted good engineering practices such as API 653 and STI SP00l. These standards consider size, configuration, design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried) and operational and maintenance experience.

Inspection and testing activities are specified in a standard format of a written formal Inspection Plan (IP). All IP's are managed by the Univar Engineering Department. There is a unique IP for each individual equipment item. The IP describes the key elements of the inspection and testing, including applicable Codes, Standards and/or statutory requirements, inspection methods and intervals, qualifications and certifications, specific details and considerations.

Formal inspection and testing activities are performed on a regular schedule specified in the IP. All inspection and testing activities are performed by persons qualified and certified in

accordance with applicable requirements. Qualification and certification requirements are incorporated by reference in the IP.

Equivalent environmental protection is also provided for the tanks by locating them on concrete pads (synthetic liner), conducting frequent visual inspections, and properly maintaining the tank and foundation.

Facility Transfer Operations and Aboveground Piping

There are three transfer stations located at the facility: truck rack, container filling, and rail cars. The facility maintains written inspection procedures for aboveground piping which provide for verifying the general conditions of items. All piping must meet Univar Engineering Specifications. These specifications, which are required for transfer piping, identify the material of construction, pressure and temperature ratings, fabrication, new-fabrication testing, and inspection requirements.

Pipeline terminal connections are properly identified and capped. Pipe supports are designed in accordance with recognized engineering methods and specifications. Visual inspections are conducted regularly of aboveground valves and piping. Repairs are made as necessary. Operating procedures are maintained at the facility.

Secondary containment for the aboveground piping from the truck unloading rack to the tank farm and drumming room was determined to be impracticable. Topographic limitations in the area prevent the installation of passive containment. The piping is 36 inches or less above the ground, which does not provide sufficient clearance to construct passive containment beneath the piping. The proximity of the piping to the ground will also present a higher risk of damaging the piping during the installation of a passive containment system. The fluid in the piping is not under pressure when it is not in use. The maximum release from the piping, when not in active use, would consist of the material in the pipe between the inlet and outlet valves, which is a reasonably small volume. While the pipeline is in use, the pressure is kept low by using low-pressure pumps. The area is visually inspected daily for leaks. All leaks are corrected promptly. These activities, plus others described in this plan, will mitigate an off-site release in the event of piping failure.

The pipe racks from the tank truck loading / unloading area to the tank farm and from the rail car unloading station to the tank farm are above ground for easy inspection. The area under most of the piping is impervious concrete. Any releases from the pipes will be contained on the concrete. Releases from piping above concrete would be readily visible to operators and cleaned up immediately. The fluid in the piping is not under pressure when it is not in use. The maximum release from the piping, when not in active use, would consist of the material in the pipe between the inlet and outlet valves, which is a reasonably small volume. While the pipeline is in use, the pressure is kept low by using low-pressure pumps. The area is visually inspected daily for leaks. All leaks are corrected promptly. These activities, plus others described in this plan, will mitigate an off-site release in the event of piping failure.

Pipe racks are situated away from roadways and vehicle operating areas to minimize potential damage to piping by vehicles. Additionally, drivers are instructed by facility employees on proper routes to use in order to control traffic flow in the facility operating areas.

Tank Truck/Car Loading/Unloading Rack

Tank car and tank truck loading and unloading procedures meet the applicable requirements and regulations established by the Department of Transportation. Containment areas are designed to prevent releases at the tank truck loading and unloading area. Operators are in constant attendance during loading and unloading operations.

Drivers, material handlers, and operators are trained to check and close all valves on a vehicle before and after loading and unloading. The valves are checked for leaks and if necessary tightened, adjusted, or replaced. Drivers, material handlers, and operators are trained to check that all transfer lines are disconnected prior to vehicle departure. Warning signs and wheel chock blocks are utilized at the loading and unloading racks to prevent premature vehicular departure. The lower-most drain and all outlets on tank trucks and cars are inspected for leaks prior to departure. All deliveries and transfers of oil products are supervised by at least one facility staff member.

9.0 SPILL CONTROL PLAN & EMERGENCY PROCEDURES

Determination of Whether an Emergency Exists

Based on the emergency identification and hazard assessment, the emergency coordinator will determine whether facility personnel can handle the incident, or whether an emergency situation exists which requires outside help.

Non-emergency responses are responses to releases of hazardous substances where there is no potential safety or health hazard (where a health hazard can be defined as fire, explosion, or chemical exposure). Further, responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the area of the release are not considered to be emergency responses within the scope of OSHA 1910.120(a)(3).

If the incident can be handled internally, it will be handled in accordance with the Emergency Procedure Master Plan (EPMP), followed by a call toUnivar Emergency Reporting (1-855-NEXEO4U), describing the incident.

An emergency release is one that is beyond an employee's Hazard Communication training (29 CFR 1910.1200) and cannot be cleaned up by employees in the immediate area. If the incident requires an emergency response, the emergency coordinator will notify the appropriate agencies and contact Univar Emergency Reporting (1-855-639-3648). The emergency coordinator will implement the EPMP and rely on further guidance from the corporate Emergency Response Coordinator. Once an outside authority arrives, the emergency coordinator will brief them on the situation and assist in any way possible until the emergency is over.

Facility Emergency Action Procedures

The facility will conduct its emergency response in accordance with the EPMP, which is outlined below. The emergency response plans for responding to a fire, explosion, injury or a release are based on defensive actions to be taken by properly trained and equipped individuals. These defensive actions are designed to avoid situations during a response that could result in overexposure or direct contact with chemicals. Upon the discovery of an incident, the response procedures are as defined below.

Discovery of an Incident

When associates discover an incident, they are to sound the alarm, shut down any production processes if that can be done safely, observe as many details of the incident as can be done safely, and get away to a safe distance. Notification procedures are outlined in the Notification section of the EPMP.

Safe Distance and Refuges

During an emergency it is essential that uninvolved and inadequately prepared persons remain safely away from danger and from areas where mitigation operations are in progress. All personnel not directly involved with emergency response will follow the procedure detailed in the EPMP. Concerns for personal injury or illness from structural collapse, exposure to chemicals or products of combustion and physical injury from contact with fire or hazardous materials must be addressed.

Notification of Emergency Coordinator

Facility personnel are instructed to notify the emergency coordinator and inform him/her of the known details of the incident. If an emergency coordinator is unavailable in the immediate area, employees are to page him or his alternate, evacuate the facility, and call Univar Emergency Reporting (1-855-639-3648).

Univar Emergency Reporting (1-855-639-3648)

The response line is staffed 24 hours a day and puts the facility in touch with a corporate Emergency Response Coordinator who is trained to coordinate emergency responses and who has access to resources that can help in an emergency. It is designed to assist personnel at the facility site who have been trained but may not have the practical experience to handle emergencies.

Emergency Identification

The emergency coordinator will determine the source and amount or extent of a fire, release of hazardous waste or oil, or injury. The emergency coordinator will determine the extent to which the facility and surrounding area are affected.

The identity of any released material is determined from the location and source of the release and from facility inventory records. If the incident involves a release of hazardous waste, characteristics will be obtained from the Waste Profile Sheets (WPS). If the incident involves a release of a chemical product, Material Safety Data Sheets (MSDS) define product characteristics. If for some reason the released material cannot be identified, a sample will be taken for chemical analysis.

Hazard Assessment -

The emergency coordinator is responsible for assessing possible hazards to human health and to the environment. To assist the emergency coordinator, Univar Solutions, LLC maintains a 24-hour emergency telephone operator who provides contact with corporate Emergency Response Coordinators.

The emergency coordinator will assess the hazards involved with an incident by utilizing the MSDS or WPS for a specific material in question and all other information that can be obtained from container labels, manifests and facility inventory records. The chemical constituents that comprise a hazardous waste are listed on the WPS. Once the chemical constituents of the waste are known, an MSDS can be obtained in order to determine the hazards associated with the individual chemical components of the waste.

External Reporting

If the facility has had a release, fire, or explosion which could threaten human health or the environment outside the facility, the emergency coordinator will immediately notify

- National Response Center 800-424-8802
- Utah Department of Environmental Quality 801-536-4123

The emergency coordinator will provide the following information:

- caller's name and telephone number
- name and address of the facility
- time and type of incident (e.g., release, fire)
- name and quantity of materials involved, to the extent known
- the extent of injuries, if any
- the possible hazards to human health, or the environment, outside the facility

In addition, both State and Local notifications must be made in accordance with the EPMP***, which includes notifying the Fire Department at 911.***

Written Response -

The emergency coordinator must note the time, date and details of any incident that requires implementing this RCRA Contingency Plan. Within 15 days after the incident, a written report must be sent to the agencies listed in Appendix A.

This report must include:

- name, address and telephone number of the facility owner or operator
- name, address and telephone number of the facility
- date, time and type of incident
- name and quantity of material(s) involved
- the extent of injuries, if any
- an assessment of actual or potential hazards to human health or the environment
- estimated quantity and composition of recovered material resulting from the incident
- any other information the agencies may require

Reporting requirements under SPCC are addressed in Section 4.0 of this plan.

Prevention of Recurrence or Spread of Fires, Explosions, or Releases

The EPMP specifies that in an event requiring evacuation, all personnel are to shut down their operations if it can be done safely. If the facility stops operations in response to an incident, the emergency coordinator will designate someone to monitor for leaks, gas generation, and pressure buildup.

Any spills outside a contained area will be isolated and cleaned up. The collected material will be disposed of at a permitted disposal site. Damaged containers will be handled in the following ways: measures will be taken to prevent further leakage and the product within will be transferred to another container, or if possible, the entire damaged container will be placed into a recovery drum.

Employees are trained in the proper use of fire extinguishers, since many products and wastes stored are flammable or combustible.

The procedures for collecting, containing and managing released wastes are the same as those for products. Aisle space will be maintained in all hazardous waste storage areas to allow unobstructed movement of applicable emergency response personnel and equipment. Procedures in the EPMP will be followed.

Storage & Treatment of Released Material

After an emergency, the emergency coordinator will make arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, surface water, or any other contaminated material. Some recovered products may be resold or recycled.

Incompatible Wastes

The emergency coordinator will ensure that no wastes are stored in an area that may be incompatible with a released material until cleanup procedures are completed.

Post Emergency Equipment Maintenance

Following an emergency event, the emergency coordinator will see that all emergency and process equipment is cleaned and readied for use again. All fire extinguishers will be checked to make sure that seals are intact, that the hose and case are not damaged, and that the gauge registers full. All damaged, empty, or partially full fire extinguishers will be replaced or recharged before operations are resumed. All safety showers and eyewashes will be checked to determine that they are clean and in good working condition. All damaged or dirty personal protective clothing and equipment will be replaced or cleaned.

In the event that a spill to the retention basin has occurred, the compacted clay liner will be assessed following removal of the contained spilled material. Impacted clay will be removed and replaced with clean clay and recompacted to the 1×10^{-6} cm/sec porosity specification before placing the basin back in service. Any clay removed from the basin will be properly disposed of off-site.

The areas of the facility affected by the emergency will be inspected for cleanliness and safe working conditions. Containers will be checked to see that they are in good condition and properly sealed and labeled. Tanks, pipe fittings, pumps and hoses will be inspected to ensure proper working order. The buildings, building supports, framework, walls and floors will be checked for signs of deterioration. Facility security devices will be inspected for damage and proper working condition. This includes the facility fence and all gates, doors, windows and locks. Post-incident salvage procedures are listed in the EPMP in section VI “Salvage and Recovery.”

During and following an emergency event, the emergency coordinator will ensure that proper employee decontamination procedures are implemented for exposed associates. In addition, all employees leaving contaminated areas will be decontaminated and all contaminated clothing and

equipment leaving those areas will be decontaminated and reused or disposed. All decontamination procedures will be monitored and assessed by the emergency coordinator.

Post Emergency Resumption of Operations

The facility operator will notify the Director and other State and Local authorities when all waste has been properly handled and all emergency equipment has been cleaned and is fit for its intended use. The notification will be given prior to resuming operations in the affected area(s) of the facility.

10.0 INSPECTIONS, TESTS & RECORDS

Daily visual inspections consist of a complete walk-through of the facility to inspect piping, equipment, containers, and tanks for integrity, evidence of releases, and excessive accumulation of storm water in the diked areas. The daily inspections of the hazardous waste loading / unloading area are documented. The facility does not maintain oil and water separators onsite.

A checklist is used during weekly inspections. The items covered in the inspections are performed in accordance with STI and API standards and good engineering practices. This written weekly checklist is prepared, signed by the inspector, and the original copies are maintained on file for 3 years.

A copy of the weekly inspection form is available from the facility. This inspection includes:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, or corrosion.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Checking the inventory of discharge response equipment and restocking as needed.
- Observing the truck pads and storm sewers to verify that they are free of oil.

Records of integrity testing performed on fixed storage tanks – in accordance with STI SP001 and API standards, are maintained by Univar Solutions, LLC's Engineering Department.

11.0 SECURITY

The facility is surrounded by a six foot high chain link fence with gates. Gates are always secured. Access to the facility is through the office, which is always attended during business hours, or through an electronically controlled main gate by authorized personnel only. All other gates are kept closed and locked when not in use and unattended. The Freeport Center security guardspatrols the entire complex in the evenings and weekends.

All valves that could potentially allow unauthorized outflow of tank contents are securely locked after-hours. All facility loading and unloading connections are capped when not in service or in stand-by.

Facility lighting illuminates the facility after dark. There is adequate lighting for night-time detection of leaks and spills, as well as to deter vandalism.

12.0 PERSONNEL, TRAINING, & SPILL PREVENTION PROCEDURES

Oil handling personnel have been instructed by management in the operation and maintenance of equipment to prevent discharges, to follow discharge procedure protocols and general facility operations, and to understand the contents of the SPCC Plan.

The Facility Manager maintains a written description of training activities and personnel training records. New employees are trained in SPCC within 6 months of starting work. The Facility Manager is the designated individual responsible for discharge prevention, and maintains the SPCC Plan.

Management provides yearly spill prevention briefings for operating personnel to ensure adequate understanding of the SPCC Plan. These briefings highlight any past spill events or failures and recently developed precautionary measures. Training includes oil spill prevention, containment, and retrieval methods. Records of these briefings and spill prevention training are maintained on file at the site.

Facility personnel must also complete a training program to comply with the RCRA Contingency Plan. This program teaches subject employee how to perform their duties in a way that ensures the facility's compliance with the requirements ofR315-264-16. This training is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

(i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment: or contacting outside suppliers to repair and replace equipment when necessary;
(ii) Key parameters for automatic waste feed cut-off systems;
(iii) Communications or alarm systems;
(iv) Response to fires or explosions;
(v) Response to ground-water contamination incidents; and
(vi) Shutdown of operations.

Initial Contingency Plan training must be completed within 6 months of an employee being assigned to the area. Employees will be supervised by trained employees until they complete their own training. Annual training is also conducted for all employees to ensure emergency preparedness.

13.0 COORDINATION AGREEMENTS & AMENDMENTS

Coordination Agreements

A copy of the SPCC, RCRA Contingency Plan, Quick Reference Guide and all revisions will be sent to the organizations with which there are coordination agreements. Those organizations are listed in Appendix A.

Fire Department: Employees from the Fire Department are familiar with the facility layout, products transferred, stored, and handled, and hazardous waste stored.

Other Emergency Response: Univar Solutions, LLC maintains an emergency response agreement with an external company. In the event of an emergency, the facility will call the Emergency Command Center at 1-855-639-3648, who will contact the current, local response company.

Amendments

The SPCC Plan must be amended within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The SPCC Plan must be reviewed at least once every five (5) years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven in the field. The five (5) year review will be documented in Appendix F. The review will be signed and will include the following statement "I have completed the review and evaluation of the SPCC Plan for the (name of facility) on (date), and will (not) amend the Plan as a result." The Plan will be amended within six months of the review. All technical amendments must be re-certified by a registered professional engineer (P.E.).

The SPCC Plan must also be amended when requested by the EPA Regional Administrator in accordance with 40 CFR 112.4(d)-(f).

Per 40 CFR 112.5(a)-(c), this facility will attach an amendment to the SPCC plan reflecting any change made on the most recently inserted date, which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States. Such amendments will be fully implemented within six months after such change occurs.

The RCRA Contingency Plan must be reviewed and amended, if necessary, whenever:

- The facility permit is revised;
- The plan fails in an emergency;
- The facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- The list of emergency coordinators change; or
- The list of emergency equipment changes.

Please see Appendix F for a history of this plan's amendments and reviews.

14.0 EMERGENCY COORDINATORS

The primary and secondary emergency coordinators are listed in Appendix A. If an emergency situation occurs in their absence, all facility and office personnel will evacuate, and the most senior employee will page the emergency coordinators and call Univar Solutions, LLC Emergency Reporting (1-855-639-3648).

At least one emergency coordinator is either on site or on call and available to respond to an emergency by reaching the facility within a short period of time. The emergency coordinators are thoroughly familiar with all aspects of the facility's RCRA Contingency Plan, all operations and activities at the facility, the location and characteristics of chemical products and wastes handled, the location of all records within the facility, and the facility layout. In the event of a fire, explosion, spill, or release of material, they have full approval of management to commit the resources necessary to implement this SPCC and RCRA Contingency Plan.

15.0 EVACUATION PLAN

In the event of a serious spill, fire, or explosion, all personnel will immediately evacuate the premises. A map showing evacuation routes is included in Appendix B.

1. The fire alarm will be used to ensure all employees have been alerted within the office and warehouse. Additionally, mobile phones serve as backup to the alarm.

2. All exits in the office, warehouse, and drum room are marked. All employees are familiar with at least two routes of exit from the facility.

3. Upon complete evacuation of the facility, all employees will immediately group north of the office building parking lot.

16.0 EMERGENCY EQUIPMENT LIST

The facility is equipped with the following emergency equipment. All emergency equipment is inspected periodically and maintained as necessary to assure its proper operation in time of emergency.

Physical Description	Location	Capabilities/Intended Use
Absorbent materials	Warehouse	Spill clean-up
Fire extinguishers	Throughout facility	Extinguish fires
Firehose station – foam suppression system	Hazardous Waste dock area	Extinguish fires
Sprinkler system and alarm	Warehouse	Extinguish fires
Fork lifts and yard tractor with fire extinguishers	Facility and environs	Hauling, fire control
First aid kit	Office	Treat minor injuries
Tools	Warehouse	Various repairs
Recovery drum	Warehouse	Containment for leaking drums
Eye wash stations	Warehouse and acid farm, bulk loading drumming shed	Employee safety from chemical splashes
Safety showers	Acid farm, bulk loading, drumming shed	Employee safety from chemical splashes
Hard hats, safety glasses, goggles, and face shields – as needed	Facility office	Protection handling
Chemically resistant gloves, boots, rainsuit, apron	Facility office	Protection

Appendix A - KEY EMERGENCY CONTACTS

AGENCIES TO WHOM A WRITTEN REPORT MUST BE SENT IF THE EMERGENCY PLAN IS IMPLEMENTED

1. Regional Administrator
   USEPA - Region 8
   1595 Wynkoop Street
   Denver, Colorado 80202-1129

2. Utah State Department of Environmental Quality
   Division of Waste Management and Radiation Control
   P.O. Box 144880
   Salt Lake City, UT 84114-4880

3. Davis County LEPC
   Davis County Sheriff's Office
   PO Box 618
   Farmington, UT 84025

AGENCIES TO WHOM A COPY OF THE SPCC/RCRA CONTINGENCY PLAN MUST BE SENT (COORDINATION AGREEMENTS)

Clearfield Police Department
55 South State Street
Clearfield, UT 84015
801-525-2800

North Davis Fire District
88 East Center Street
Clearfield, UT 84015
Main phone number: 801-525-2850

Davis Hospital & Medical Center
1600 W Antelope Dr
Layton, UT 84041
801-807-1000

Utah Emergency Response Commission
195 North 1950 West (First Floor)
Salt Lake City, UT 84116
801-536-4300

Davis County LEPC
Davis County Sheriff's Office
PO Box 618
Farmington, UT 84025
801-451-4129

EMERGENCY COORDINATORS

Primary

Michael Hahn	Office Phone: 801-776-1295 x 227
Facility Manager	Cell Phone: 801-719-1046
738 Seabiscuit Drive	Fax Number: 281-500-2417
Kaysville, UT 84037	Home Phone: Not applicable

Secondary

Lonn Salmond	Office Phone: 801-776-1295 x 224
Facility Supervisor	Cell Phone: 801-497-9004
798 E 1925 N	Home Phone: 801-782-4237
Ogden, UT 84414	

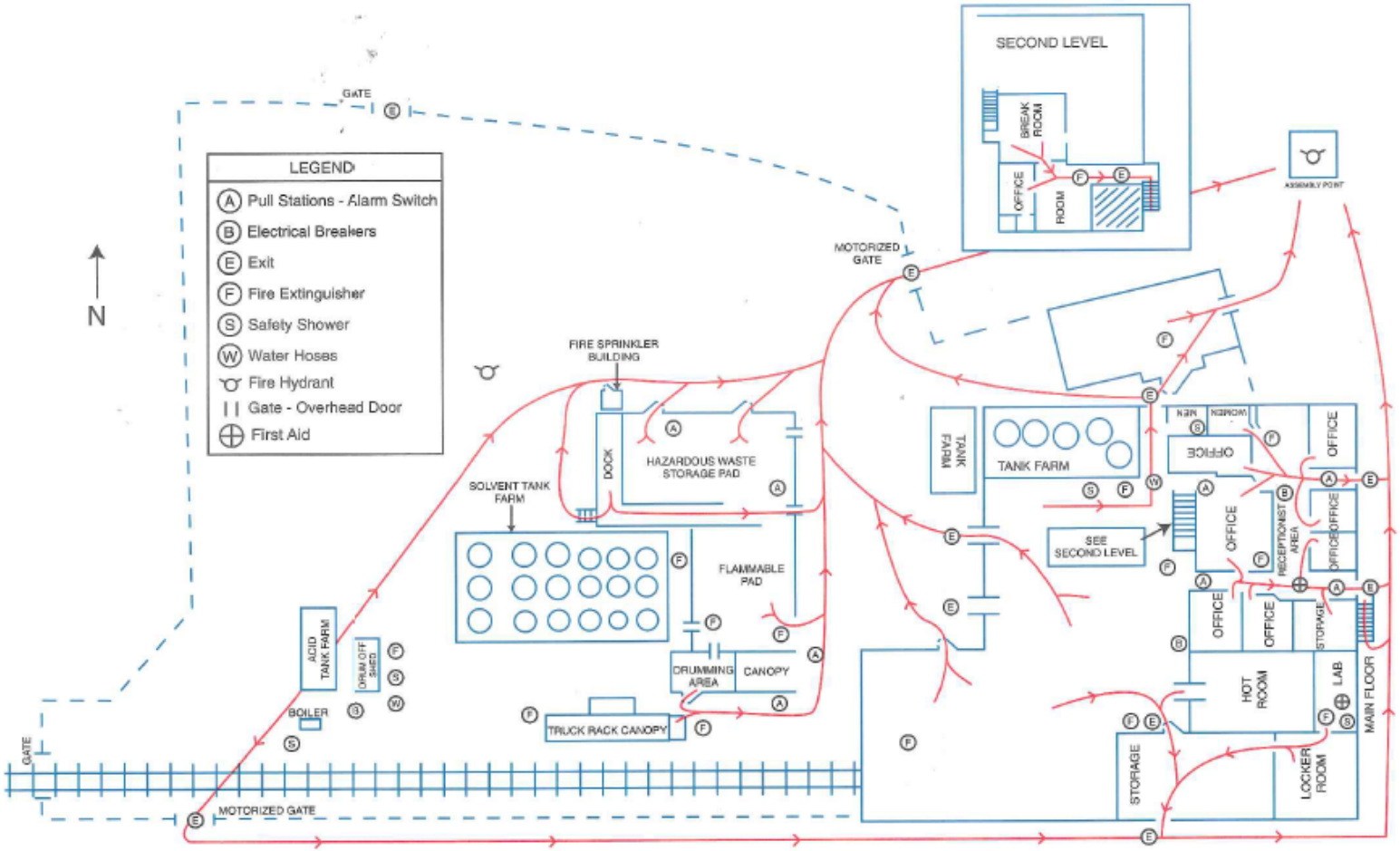
Tertiary

Tom Maughan	Office Phone: 801-776-1295 x 231
Compliance Lead	Cell Phone: 801-807-9004
3508 West 5700 South	Home Phone: 801-217-3845
Roy, Utah 84067	

Appendix B - FACILITY DIAGRAMS

Aerial Photo of the Clearfield, Utah Facility

Evacuation Map of the Clearfield, Utah Facility



nexeo solutions

Nexeo Solutions LLC
Building 12

EMERGENCY ALARM AND PROCEDURES

MAJOR EMERGENCIES:

Alarm: A loud klaxon horn or siren will sound as well as utilizing the walkie talkies carried by employees in the warehouse.

Action: All personnel evacuate the plant. Assemble at evacuation assembly point. Do not leave assembly point until accounted for and instructed to do so. (see map for location)

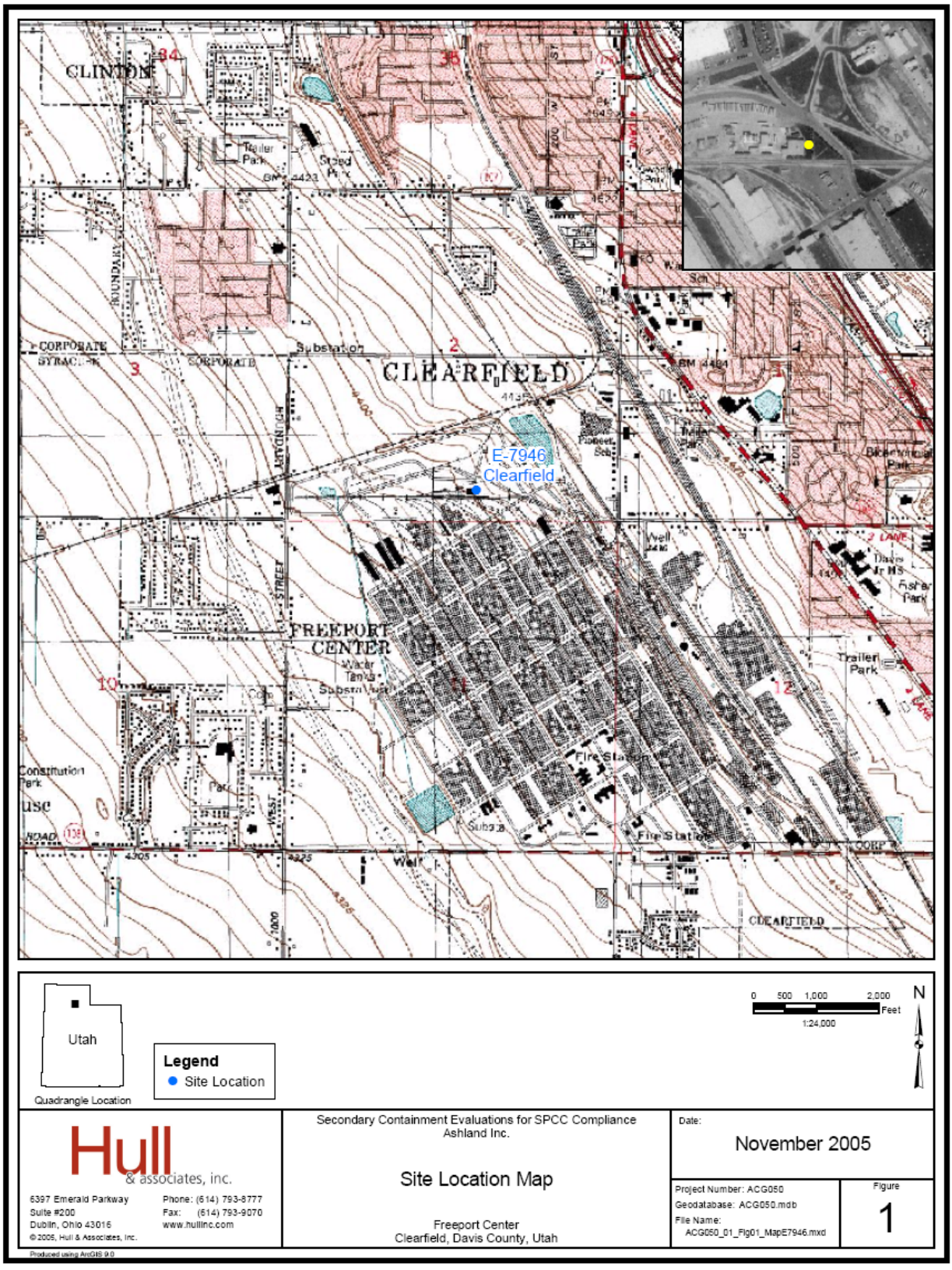
CONTRACTOR FOREMEN are responsible for accounting for all their employees and report this to the Emergency Coordinator.

DO NOT enter the plant when the alarm is sounding...this indicates an emergency.

NOTE: Alternate Head Count Area is east of the FUTURA PARKING LOT in the grassy area.

NOTE: Drawing not to scale.

Topographical Map of the Clearfield, Utah Facility



Appendix C - INSPECTION FORMS

The current version of each inspection form is available from the facility.

Appendix D - ACTION ITEMS

The section of piping from the tank farm to the truck loading rack and the drumming room does not currently have secondary containment. At the time this plan was submitted additional containment is determined to not be feasible based on the distance from the piping to the ground (3 feet). To comply with the SPCC regulations, Univar Solutions is developing an Oil Spill Contingency Plan under 40 CFR 109.

There are currently no other deviations from the SPCC rules and regulations that need to be addressed.

Appendix E - CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Appendix C to 40 CFR Part 112—Substantial Harm Criteria
Attachment C-II—Certification of the Applicability of the Substantial Harm Criteria

Facility Name: Univar Solutions, LLC

Facility Address: Freeport Center, Building 12

Clearfield, Utah 84016

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

   Yes___ No_X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

   Yes___ No_X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula 1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

   Yes___ No_X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

   Yes___ No_X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

   Yes__ No_X

Certification

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

Signature: _____

Print Name: __Michael Hahn_____

Title: _____Facility Manager_____

Date: _____

Appendix F - PLAN REVIEWS AND AMENDMENTS

Amendment or Review Date	Personnel, Physical, or Operational Change	Amendment Location in SPCC/RCRA Contingency Plan
February 1998	Model of Ashland Distribution Company's (former operator) SPCC format implemented	Throughout plan
October 2000	Removed references to used oil activities	Section 9.0
April 19, 2002	Updated site drainage plan based on grading project	Section 6.0
August 2007	Revised contacts, added references to retention basin, new hazardous waste storage pad, containment berms, and rail car catch pans.	Throughout plan
February 2008	Added Utah Administrative Code Citations to section headers.	Throughout plan
April 2010	Added new secondary emergency coordinator	Appendix A
August 2010	Updated tank inspection protocol per Engineering Dept changes. Updated Emergency Response Contractor to Clean Harbors Updated UT DEQ's mailing address.	Sections 8 and 10 Section 13 Appendix A
February 2011	Changed owner/operator name from Ashland to Univar Solutions, LLC Updated emergency response contractor to CES Custom Environmental Services	Throughout plan Section 13
September 2011	Updated Fixed and Mobile Storage of Oil table Updated Other Emergency Response section Updated facility owner's name and emergency phone number Updated addresses and phone numbers	Section 5.1 Section 13 Throughout plan Appendix A
July 2013	Updated addresses and phone numbers Removed reference to "new" storage area, updated from "plant" to "facility" Replaced two-way radios with air horns and cell phones	Appendix A Throughout plan Throughout plan
September 2013	Updated facility manager and VP operations names Updated company mailing address	Throughout plan Page 6
May 2014	Updated facility manager	Throughout plan
July 2014	Updated Director of Operations	Throughout plan
May 2015	Updated personnel names and contact information	Throughout plan
February 2016	Combined August 2013 and May 2015 modifications Updated mailing address for Utah DEQ and Appendix F	Throughout plan Appendix A

5 YEAR REVIEW AND CERTIFICATION

The next five year review of the SPCC and RCRA Contingency Plan is due in June 2018. The Plan must be amended within six months of the review date. Amendments are listed on the previous page. The Plan must be reviewed by the Facility Manager and the following statement must be completed and signed:

"I have completed the review and evaluation of the SPCC Plan for the Univar Solutions, LLC facility in Clearfield, Utah on _____, and will (not) amend the Plan as a result."
(date)

_____ _____
Signature of Facility Manager Date