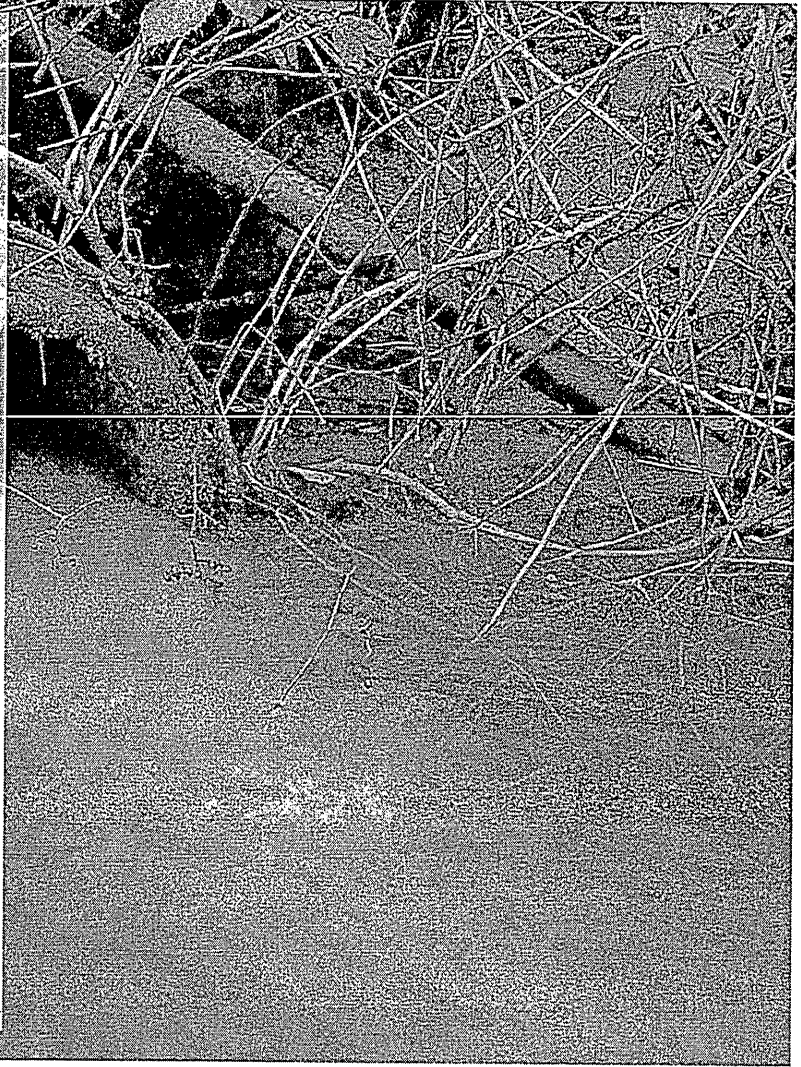


**Nucor Steel Seattle, Inc.**

**Combined Water Pollution  
Prevention Plan**



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### Emergency Contacts

#### Nucor Steel Seattle Emergency Contacts

Title	Name	Work Number	Cell Phone Number
Environmental Manager	Pat Jablonski	206-933-2238	206-713-0969
Environmental Engineer	Jeffrey Eis	206-933-2205	206-963-6045
Environmental Engineer		206-933-2223	
The names listed have a descending order of responsibility.			

### Agency Contacts

Facility personnel must contact someone listed on the Emergency Contact List above, if the first three are not reached, in the event of a release of oil or a hazardous substance, contact a Department Manager or Supervisor.

### Reportable Quantity Spill Contacts

The Environmental Manager or Environmental Engineer must notify the appropriate emergency response agencies as necessary:

For a release of any of the following in accordance with the RQ specified by regulation		Notify These Agencies	Telephone Number
Oil	40 CFR 112	DOE or NRC	800-258-5990/425-649-7000 or (800) 424-8802
Oil containing polychlorinated biphenyls (PCBs)	40 CFR 302/ 40 CFR 761.125	NRC	(800) 424-8802
Hazardous Substances	40 CFR 302	NRC	(800) 424-8802
Hazardous and extremely hazardous substances that result in exposure to persons off the Site	40 CFR 355		
Spill event with the potential for release of pollutants to stormwater system	BMP 5 of the City of Seattle Source Control Manual [2.1.5.2]	SPU	206-684-8344

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**Certifications**

**Management Support (112.7)**

This Combined Water Pollution Prevention Plan, describes the engineering practices which reduce the potential for uncontrolled releases of many materials used at the Facility

The plan has been prepared in accordance with sound engineering practices. The facility management fully commits to implementing this plan. All required resources will be provided.

*Matthew J. Lyons 7-29-19*

Matthew Lyons  
Vice President and General Manager  
Nucor Steel Seattle, Inc.

**Engineering Certification (112.7 (d))**

I hereby certify that I have examined the Nucor Steel facility located in Seattle, Washington, and being familiar with the provisions of 40 CFR 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices and the requirements of 40 CFR 112 prior to the regulatory changes promulgated on July 17, 2002.

*P. Jablonski 7/29/19*

Patrick Jablonski, P.E.  
Environmental Manager  
Nucor Steel Seattle, Inc.



Exp. 5/18/20  
*[Signature]*

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## 1.0 – Regulatory Scope

This Spill and Stormwater Pollution Prevention and Source Control Plan (Prevention Plan) including the protection of stormwater, has been prepared for the Nucor Steel Seattle, Inc. (Nucor) West Seattle Mill (Facility) located in Seattle, Washington.

This plan describes engineering features and management techniques used to prevent the release of significant or hazardous materials at the site. Table 1 lists regulations the Prevention Plan complies with.

Table 1 – Regulations Addressed by the Prevention Plan

Regulation	Justification
40 CFR §112 Oil Spill Prevention (SPCC) Planning	Because the Facility stores over 1320 gallons of petroleum and is located near a navigable waterway, it is required to maintain oil spill prevention control and countermeasure planning (SPCC) in accordance with the Clean Water Act.
NPDES Permit WA003130 Spill Planning and Stormwater Pollution Prevention Planning (SWPPP)	The facility NPDES permit conditions S8 and S9 require that a Spill Plan and SWPPP be prepared.
40 CFR §262 Hazardous Waste Preparedness and Prevention Planning for Large Quantity Generators	The facility operates as a Large Quantity Generator of hazardous waste and is required to manage waste in compliance with standards for containers and tanks which will minimize spills.
Port of Seattle's Phase I Municipal Stormwater NPDES Permit Special Condition S6.E.7	The northern most portion of the property is leased by Nucor from the Port of Seattle and is thus subject to this portion of their permit.

The Facility is not subject to the substantial harm criteria listed in 40 CFR 110. As such, Appendix A contains the required certification form documenting that the Facility is not "reasonably expected to cause substantial harm to the environment by discharging into or on the navigable waters or adjoining shorelines."

## 2.0 – Facility Description

### 2.1 – General

Figure 1 depicts the site location of the West Seattle Facility. The Facility is located at 2424 Andover Street, West Seattle, Washington, and occupies approximately 44 acres of the Duwamish River basin about 2 miles south of where the basin terminates in Elliot Bay.

The Facility melts and recasts scrap steel into billets. Billets are rolled into various forms at the facility. The facility typically operates 24-hours a day, 7 days per week.

### 2.2 – Facility Drainage and Discharges

#### 2.2.1 – CLOSED COOLING WATER SYSTEMS

The facility uses several cooling water systems (Caster cooling and Rolling mill cooling) within the manufacturing process of steel. These systems are closed. Water is recycled through cooling coils or contact surfaces. Water that evaporates is made up with from the facility's water supply. Treatment chemicals are

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added to maintain the water quality required for the cooling systems to operate. There is no connection of the cooling water system with the stormwater drainage system.

Nucor is familiar with the location of cooling system piping through engineering drawings and plant experience and they do not connect with any stormwater drainage piping.

#### **2.2.2 – STORMWATER DRAINAGE**

Stormwater drainage on the relatively flat site is depicted on Figure 1. Stormwater which forms on the site is collected in stormwater catch basins directed to underground sewer pipes located in the center of the site. The underground sewer pipes join at the north side of the property in an oil-water separator/sediment trap.

The outlet of the oil-water separator (called the junction box at the site) is the NPDES discharge point for the site. The discharge enters an approximate 6-foot diameter 1-mile long pipe, which travels to Elliot Bay, where the stormwater enters the bay. The pipe is shared by other users not related to Nucor.

The area surrounding the facility is serviced by City of Seattle street equipment with stormwater collection drains, which under normal<sup>1</sup> conditions, prevent run-on to the facility.

#### **2.3 – General Spill Characteristic of Site Layout**

The general physical features of the facility minimize the potential effects that a site spill would have on adjacent property. The facility is relatively flat which tends to mitigate the potential lateral movement of a spill, should one occur.

#### **2.4 – Security Procedures to Prevent Spills**

Nucor maintains security procedures that are intended to prevent unauthorized entry of persons or animals into the active portion of the facility. These procedures minimize the potential for vandalism or unauthorized manipulation of oil or hazardous materials stored at the facility.

The property is surrounded by chain link fencing to restrict plant access to controlled entry/exit points. The main entrance gate, which is not open to the public, is controlled by a security guard 24 hours per day. Gates are kept locked when not in use.

#### **2.5 – History of Spills**

On November 4, 2014 at 8:45 AM Nucor Steel Seattle discovered an approximate 10 gallon Diesel Fuel spill from a vehicle at the 2424 SW Andover Street Mill Facility. The event occurred following the refueling of a service vehicle. The fuel tank cap had not been replaced after vehicle fueling and the equipment was subsequently driven approximately 1000 feet of facility roadway before the cap was found to be missing from the fuel tank.

<sup>1</sup> As specified in the Facility's NPDES permit, to the south of the site the City of Seattle has diverted Longfellow Creek to a city operated storm sewer. Under large rainfall events, the capacity of the sewer is reached and the creek overflows onto the Facility.



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The roadway was inspected, at approximately 9:30 am, and found to have visible oil sheen. The stormwater was also inspected and found to have oil sheen in the upstream section of the oil water separator. Oil absorbents from our spill kits were placed in the oil water separator to remove the oil sheen. This cleanup action was completed at 11:00 AM. Nucor dispatched service vehicles from Emerald Services to remove the spill residual from the roadway. This cleanup was completed on November 4, 2014 at 6 PM.

### **3.0 – Identification of Potentially Significant Materials**

Nucor audited the facility for materials and activities that could require spill prevention planning. The following materials and activities have been audited:

- Raw materials;
- Finished products;
- Solid wastes;
- By-product generation;
- Air emissions;
- Loading, unloading, and storage activities;
- Vehicle and plant maintenance;
- Transformers with insulating oil; and
- Fueling.

Table 2 lists each material identified for evaluation in this Plan. Approximate storage quantities and storage locations (indoors vs. outdoors) are identified for each material and transformers. Figure 1 (which may be found on the environmental page of Nucor's SharePoint site) depicts the locations of these materials and transformers.

All materials and liquids stored within secondary containment shall be compatible with the construction materials of their containment (e.g. highly corrosive materials shall be stored in corrosion resistant secondary containment).

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Table 2 – Potentially Significant Materials

Location Code on Figure 1	Material	Typical Quantity On Site	Tank Type Materials	Exposure to Rain	Secondary Containment	Dimensions (ft) / Capacity (gal.)
<b>Petroleum Products</b>						
<i>In storage (subject to SPCC planning in Section 4)</i>						
A1	Hydraulic oils, engine oil, Diesel fuel	3 @ 55 gal 20 gal, 330 gal	Steel	No	Indoors on sloped pad which drains to sump	19' x 19' x 5" 1122 gal.
A2	Diesel fuel	25,000 gal tank	Steel	Yes	Concrete with 27,000 gallon capacity with 7 inches free board	7.5' x 22' x 22' 27,000 gal.
A3	Hydraulic fluid, lubricant	8 @ 330 gal	Plastic	No	Concrete containment	10' x 20' x 3' 4490 gal.
A4	Grease, lubricant, hydraulic fluid	3 @ 55 gal 330 gal 2 @ 330 gal	Drums and plastic tanks	No	Concrete containment	7.5' x 19.5' x 0.6' 656 gal.
A5	Waste satellite Collection Depot Used oil collected by skimmer from caster closed cooling system	500 gal	Steel	Yes	Tank pad that drains to closed cooling system	50' x 20' x 2' 12,900 gal.
A6	Used oil collected by skimmer from roll mill closed cooling system	500 gal	Steel	Yes	Tank pad that drains to closed cooling system	50' x 50' x 2' 37,450 gal.
A7	Hydraulic oil tank, antifreeze, transmission fluid, miscellaneous oil, grease	2 @ 180 gal < 10 drums	Plastic/Steel	No	Indoors w/ individual containment	5'x5'x2.5' 467 gal varies
A8	Used oil Grease	500 gal 55 gal	Steel drum	No	Double Wall Tank Roof	2.5' x 4' x 5" 31 gal.

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A9	Misc. hydraulic fluid & lube oil & grease, skylol	<50 drums 3 @ 330 gal tank	Misc.	No	Bermed storage area	50' x 30' x 0.66' 7480 gal.
A10	Used oil & grease storage	15 drums 5 tanks @250 gal	Misc.	No	Bermed storage area	20' x 100' x 0.66' 9,980 gal.
A11	Water treatment chemicals	6 @ 55 gal drums, 2@330 gal	Plastic	No	Bermed storage area	5' x 13' x 1.5' 730 gal.
	Diesel	300 gal	Steel			
	Mold lube	6000 gal	Steel tank		Double wall tank	
A12	Rust vedo, lubricant, grease	4 @ 55 gal	Steel drums	No	Indoors, concrete floor	
A13	lube oil	Drums	Steel	No	Indoors, concrete floor	D 30" tall 26" 80 gal
A14	Hot oil	20 gal tank 4 @ 5 gal	Steel tank/ plastic bottle	No	Indoors, concrete floor	
A15	Grease	Up to 5 drums	Steel drums	No	Steel shed	
A16	Misc. oil, coolant	<10 drums, steel cylinders (4 @ 97 gal, 3 @ 65 gal)	Steel drums	No	Bermed Storage Area	1'x24'x20' 3590 gal.
A17	Multi way Oil	2 @ 55 gal	Steel	No	Indoors	D 30" tall 26" 80 gal.
	Tool cutting oil	5 gal	Plastic	No		D 30" Tall 8" 25 gal.
A18	Grease	2 @ 55 gal	Steel Drums	No	Manufactured drum containment	4" X 4' X 8' 80 gal
A19	Hydraulic oil	55 gal	Steel drum	No	Indoors	1.5' x 1'x 0.5' 5.6 gal.
A20	Misc. oil, used oil	4x275 gal, 55gal, 20 gal	Steel drums and steel tanks	No	Indoors	
	Coolant Gear lubricant	275 gal 55 gal				

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A21	Grease	2x55gal, 5x120 lb	Steel drum	No	Indoors	
A22	Grease	55 gal	Steel tank	Yes	Partially covered	8'x 16' x 4' 3830 gal.
A23	Misc. oil	2 @ 800 gal 1000 gal	Steel drums	No	Indoors	
A24	Used oily rags	55 gal	Steel drums	No	Indoors	
A25	Grease, used oil waste Lube oil	3 @ 120lb 55 gal 55 gal	Small cans	No	Indoors	Flammable cabinet 2 @ D = 2.7 ft, tall = 0.5 ft 21.4 gallons
A26	Grease	14 oz	Steel drums	Yes	Bermed Storage Area	4' x 4' x 1.5' 180 gal
A27	Oil, grease	55 gal, 120 lb	Steel drums	No	Indoors	32" D 8" tall for Castro's 19' x 15' x 3' 6400 gal.
A28	castrol Chemtainer	4 @ 55 gal	Steel drums	No	Roof	5' x 5' x 2' 374 gal.
A29	Misc. oil and grease	55 gal 300 gal Less than 50 drums	Steel plastic	No	Indoors	34' x 25' x 6" 3180 gal.
A30	Hydraulic oil	200 gal	Steel tank	Yes	Plastic container	
A31	Hydraulic fluid, lubricant	330 gal	Plastic	No	Indoors	
A32	Hydraulic oil	1200 gal	Steel	No	Indoors	
A33	Oil waste	4 @ 55 gal	Steel drum, steel tank	No	Indoors	
A34	Oil	55 gal, 50 gal	Steel tank	No	Indoors	
A35	Grease	55 gal	Steel drum	No	Indoors	
A36	Grease	55 gal	Steel drum	No	Indoors	

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A37	Waste satellite Collection Depot						
A38	Diesel fuel	60 gal	Steel tank	No	Double wall tank		
A39	Pressure was cleaning solution	2 @ 55 gal	Plastic	No	Plastic containment	12" x 12" x 5"	3 gal.
<i>In Active Reservoirs (In Use)</i>							
R1 & R2	Hydraulic oil reservoirs in use for various equipment used in melt shop and rolling mill	Varies, 55 gal drums, 400 gal tote	Steel & Plastic	No	Steel pans and/or building foundations	2' x 7' x 0.42'	42 gal
<b>Hazardous Wastes</b>							
K1	Misc. Hazardous and non hazardous waste	<50 drums	Misc.	No	Bermed Storage area	20' x 200' x 0.5'	14980 gal.
K2	K061 dust	0-200 tons	Steel	No	Indoors		
K3	Aerosol collection unit	55 gal. drum	Steel	No	indoors concrete floor	2' (dia.) x 3'	55 gal.
<b>Significant Materials</b>							
M1, M2	Water treatment chemicals	500-2000 gal	Plastic	No	Concrete and steel basins		
M3, M5	Alloy agents, olive, silicon manganese, carbide, carbon, lime, vanadium alloy, magnesium oxide, refractory, desulf etc.	40-220 tons	Bins or supersacks, carbon and lime silos	Mostly covered	N/A solid		
M4	Caster Temp, artificial slag, refractory	Up to 10 tons	Supersacks, plastic	No	N/A solid		
M6	Carbon Electrodes	40-200 tons	Plastic	Yes	N/A solid		
M7	Scrap	Varies	n/a	Partially covered	N/A solid		
M8	Magnesium oxide	40-200 tons	Steel silo	Mostly covered	N/A solid		
M9	Skysol parts cleaner stations	55 gal per station	Steel	No	Indoors		
M10	Closed loop water treatment chemical – Corrosion inhibitor	< 12 drums	Plastic	No	Concrete berm	8' x 15' x 2'	1790 gal.
	Water clarification aid	330 gal		No			

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M11	Calcium Carbide	140,000 lbs	Steel		Yes	N/A Solid	
M12	Sulfuric Acid	680 gal	Plastic		No	Indoors	D 75" x tall 4' 918 gal
M13	Boiler Treatment Chemical	55 gal	Plastic		No	Indoors	
M14	Chemtreat	2 @ 330 gal	Plastic		No	Steel shed	15' x 8' x 6" 450 gal.
M15	Scrap/Solid waste	1-10 tons	Ecology blocks		Yes	N/A solid	
M16	New electrodes, carbon, MgO	10-100 tons	Plastic		Yes	N/A solid	
M17	Used carbon electrodes, scrap metal Equipment Storage (Liebherr material mover)	Up to 1000 tons			Yes	N/A solid	
M18	Nalco water treatment chemical	2 @ 55 gal	Drums		No	Plastic containment	4' x 6' x 5" 75 gal
M19	Refractory, Desulfurizer, alloying additive, etc.	< 100 tons	Plastic		No	N/A solid	
M20	Water treatment chemical, bleach	2 @ 330 gal	Plastic		No	Steel containment	8' x 4' x 1.5' 360 gal
M21	SiMn	< 20 tons	roof		No	N/A solid	
M22	Caster Temp. artificial slag	<10 tons	Plastic		No	N/A solid	
M23	Vanadium Carbon NaCl	< 150 drums < 20 tons < 70 drums	Steel drums/plastic cover		Yes	N/A solid	
M24	Old equipment storage						

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M26	High Temp Stirrer	varies	Plastic cover	Yes	N/A solid	
M27	Empty containers	varies	Plastic/steel	Yes	N/A solid	
M28	Water treatment chemicals	300 gal totes and 55 gal drums	Plastic	No	Cement containment	284" x 55" x 21" 1420 gal.
M29	Carbon Silo	Up to 157,600 lb	Steel silo	No	N/A solid	
M30	Carbon Silo	Up tp 122,000lb	Steel silo	No	N/A solid	
M31	2 Lime Silos	Total up to 260,000 lb	Steel Silo	No	N/A solid	
M32	Loading, unloading and storage activities					
M33	Binder Mixture	55 gal	Plastic	No	Plastic containment	D 2.5' tall 20" each 61 gal.
S	Scale and Slag	80,000 tons	n/a	Partially covered	N/A solid	
F	Refractory, dolomite, chrome bricks	Up to 14,500 lb	n/a	No	N/A solid	
JB	Water Treatment carbon	15,000 lb	Steel	Yes	N/A solid	3' x 3' x 3' 200 gal.
JB	Discharge water treatment chemical	55-400 gal	plastic	Partially covered	Plastic containment	4' x 4' x 2' 240 gal.
Transformers						
TC-5	Trans. insulating oil, non-PCB	650	Steel	Yes	Concrete berm, plantwide oil-water separator on stormwater treatment system.	15' x 23' x 8" Shared with 38 and 41 1720 gal.
TC-25	Trans. insulating oil, non-PCB	303	Steel	Yes	Concrete berm, plantwide oil-water separator on stormwater treatment system.	14.5' x 14.5' x 6" 785 gal.
TC-28	Trans. insulating oil, non-PCB	290 (RTEMP)	Steel	No	Indoors, concrete vault.	N/A

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TC-30	Trans. insulating oil, non-PCB	225	Steel	Yes	Concrete berm, plantwide oil-water separator on stormwater treatment system.	15' x 30' x 6" 1685 gal.
TC-32	Trans. insulating oil, non-PCB	7,400	Steel	No	Indoors, Concrete berm, plantwide oil-water separator on stormwater treatment system.	66'4"x16'6"x1' 7939 gal.
TC-33	Trans. insulating oil, non-PCB	Stored empty.	Steel	No	Indoors, Concrete berm, plantwide oil-water separator on stormwater treatment system.	66'4"x16'6"x1' 7939 gal.
TC-34	Trans. insulating oil, non-PCB	2,300	Steel	No	Indoors, Concrete berm, plantwide oil-water separator on stormwater treatment system.	66'4"x16'6"x1' 7939 gal.
TC-36/TC-9020	Trans. insulating oil, non-PCB	7,400	Steel	No	Indoors, concrete vault.	N/A
TC-37	Trans. insulating oil, non-PCB	Shared capacity with TC-36.	Steel	No	Indoors, concrete vault.	N/A
TC-38	Trans. insulating oil, non-PCB	581 (FR3)	Steel	Yes		15' x 23' x 8" Shared with 5 and 41 1720 gal.
TC-39	Trans. insulating oil, non-PCB	600	Steel	Yes	Concrete berm, plantwide oil-water separator on stormwater treatment system.	8' x 5' x 20" and 6'6"x3'x16" 694 gal.
TC-40	Trans. insulating oil, non-PCB	573	Steel	No	Indoors	N/A
TC-41	Trans. insulating oil, non-PCB	187	Steel	No	Indoors	15' x 23' x 8" Shared with 38 and 5 1720 gal.
TC-42	Trans. insulating oil, non-PCB	Stored empty.	Steel	No	Indoors, Concrete berm,	66'4"x16'6"x1'

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TC-44	Trans. insulating oil, non-PCB	493		Steel		Yes	plantwide oil-water separator on stormwater treatment system.	7939 gal.
TC-46	Trans. insulating oil, non-PCB	200		Steel		No	Concrete berm, plantwide oil-water separator on stormwater treatment system.	10' x 13' x 8" 650 gal.
TC-47	Trans. insulating oil, non-PCB	647		Steel		Yes	Indoors	N/A
TC-48	Trans. insulating oil, non-PCB	437 (FR3)		Steel		Yes	Gravel bed, plantwide oil-water separator on stormwater treatment system.	N/A
TC-49	Trans. insulating oil, non-PCB	420		Steel		Yes	Concrete berm, plantwide oil-water separator on stormwater treatment system.	9' x 9' x 10" 500 gal.
TC-50	Trans. insulating oil, non-PCB	622 (FR3)		Steel		Yes	Concrete pad, plantwide oil-water separator on stormwater treatment system.	10' x 10' x 1' 750 gal.
TC-51	Trans. insulating oil, non-PCB	150		Steel		No	Concrete pad, plantwide oil-water separator on stormwater treatment system.	15'x24'x8" 1795 gal.
TC-52	Trans. insulating oil, non-PCB	4,950		Steel		No	Indoors, concrete vault.	N/A
TC-53	Trans. insulating oil, non-PCB	345		Steel		No	Indoors, concrete vault.	N/A
TC-54	Trans. insulating oil, non-PCB	50		Steel		No	Indoors, concrete vault.	N/A
TC-55	Trans. insulating oil, non-PCB	50		Steel		No	Indoors, concrete vault.	N/A
TC-56	Trans. insulating oil, non-PCB	50		Steel		No	Indoors, concrete vault.	N/A
TC-63	Trans. insulating oil, non-PCB	421		Steel		Yes	Concrete berm, plantwide oil-water separator on stormwater treatment	15' x 30' x 6" 1685 gal.

Document Status:

Document Type: Not Valid

Printed By:

Print Date:

Revision #:

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TC-64	Trans. insulating oil, non-PCB	650	Steel	Yes	system. Concrete berm, plantwide oil-water separator on stormwater treatment system.	13'X13'X10" 1053 gal
TC-65	Trans. insulating oil, non-PCB	307	Steel	No	Indoors	N/A
TC-9021	Trans. insulating oil, non-PCB	421	Steel	No	Concrete berm, plantwide oil-water separator on stormwater treatment system.	8.5' x 8.5' x 1.5' - 5' x 5' x 1.5' 530 gal.

Document Status:

Document Type: Not Valid

Printed By:

Print Date:

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#### **4.0 – Spill Prevention for Oil**

This section details the spill prevention controls that have been implemented at the West Seattle facility for petroleum oils. Spill prevention for oils is described in accordance with the required outline in 40 CFR § 112.

##### **4.1 – Past Spill**

As described in Section 2.5, Nucor has no record of releases of petroleum products to navigable waters from the facility.

##### **4.2 – Facility General Drainage**

As described in earlier Section 2.2, the facility's general drainage system is flat. Underground pipes transmit drainage to the northern side of the site where the stormwater enters a large 1-mile long, 6-foot diameter pipe that conveys the stormwater to Elliot Bay.

##### **4.3 – Oil Storage Tank Description and Containment**

Tanks used to store oil have been appropriately designed. Table 2 describes material used to construct oil storage tanks used at the Facility, capacity of each tank, and type and capacity of each containment for each tank.

Drainage of collected stormwater within the secondary containment for all containment exposed to rain is managed as follows:

*Stormwater collected in the containment is contained by a normally closed/locked valve (if a valve is present on the containment) until it evaporates. If the rate of accumulation exceeds the evaporation rate, the collected water is inspected for the presents/absents of an oil sheen, and if free of oil sheen, discharged in to the facility's stormwater collection system. If oil is present, the water is removed and added to the facility's closed cooling system. This inspection and release is documented on the monthly secondary containment inspection form.*

*Stormwater collected around the scaling pit and used oil tanks is directed to the closed loop cooling systems where it is used as makeup water.*

##### **Buried Oil Tanks**

No buried tanks are used at the facility.

##### **Oil Tank Inspection**

All tanks are visible to plant workers. They are subject to inspection as described in Section 9 of this plan. Integrity testing is performed on an as-needed basis. In addition, documented inspections of secondary containment structures are conducted on a monthly basis.

##### **Oil Tank Heating Coils**

No heating coils are used in tanks.

##### **Oil Tank Gauging & Over Fill Protection**

Gauging of the liquid level in tanks is performed using visual site glasses and/or other visual level gauging.

##### **Inspection of Plant Effluents for Oil and Treatment System for upsets**

The plant effluent is treated in accordance with the plants NPDES permit WA003130-5. The treatment system and effluent are inspected in accordance with that permit and the Stormwater Operations and Maintenance Plan.

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**Correction of Visible Leaks of Oil**

All leaks of oil are promptly corrected by Nucor maintenance staff.

**Portable Tanks/Totes/Drums of Oil**

Nucor uses 55-gallon drums and portable oil totes in various locations at the Facility. As a general practice, these drums are located indoors and/or within secondary containment unless they are actively being worked with/handled.

**5.0 – Description of Oil Tank Piping**

Nucor oil tanks utilize minimal amounts of piping. Several tanks use short spans of piping for filling and emptying purposes, but these pipes are not exposed to potentially damaging vehicular traffic.

The 25,000-gallon tank has short length of pipe connecting a dispensing pump with the tank.

**5.1 – Oil Tank Loading and Unloading**

A Nucor employee or contractor must be present during all transfer activities from tank trucks to the storage tank. Attendance by a Nucor employee or contractor is required 100 % of the time during mobile equipment fueling.

**5.2 – Oil Tank Inspections**

Nucor inspects oil tanks in accordance with Section 9, Inspections and Training, section of this Plan. In addition, documented inspections of secondary containment structures are conducted on a monthly basis.

**5.3 – Oil Tank Security**

Security for the site is described in Section 2.4 of this Plan. Features of security relating to oil pollution prevention include:

- Site perimeter fencing;
- Restricted site access using entrance gates which are continuously manned, or otherwise locked; and
- Continuous site lighting.

**5.4 – Oil Spill Prevention Training**

Nucor conducts periodic oil spill prevention training in conjunction with other spill prevention programs as described in Section 8, Inspections and Training, section of this Plan.

**6.0 – Spill Prevention for Hazardous Waste**

Nucor generates a variety of hazardous wastes, including the listed process waste for electric arc furnace dust (K061). The vast majority of hazardous waste generated at the site is K061 dust. The remaining hazardous wastes include discarded or expired chemicals, aerosol cans, greasy debris, etc.

K061 dust is generated in an overhead baghouse located in a totally enclosed building (baghouse). The baghouse collects the dust in hoppers, which are regularly emptied into railroad cars. The railroad cars are made of steel, which is compatible with the K061 dust, and are of dust-tight construction. Other hazardous wastes are generated throughout the plant. Each hazardous waste stream is collected separately in a compatible, DOT-approved shipping container (e.g. clean 55-gallon metal drums with fastened lids).

Combined spill response procedures for any hazardous material are included in SJP-0005-ENV. These management practices comply with standards for hazardous waste and adequately minimize the potential for spills.

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## **7.0 – Spill Prevention for Other Significant Materials**

Nucor has prepared spill prevention practices for the remaining materials listed in Table 2 in accordance with Stormwater Pollution Prevention Guidelines Best Management Practices (BMPs). Management practices for each type of material are discussed below. Practices reflect recognized BMPs, as applicable.

### **7.1 – Non-Hazardous Solid Waste**

Nucor uses solid waste dumpsters, which are located throughout the facility to collect debris and non-hazardous solid waste. All recyclable materials are to be placed in the proper recycling dumpster. A local waste management company collects these dumpsters on a regularly scheduled basis. To avoid improper waste disposal, all Nucor employees are instructed not to dispose of hazardous materials in these dumpsters.

### **7.2 – Discarded Oily Solid Waste**

Nucor generates oil-soaked absorbents resulting from cleanup of localized oil spills. To minimize the potential for further releases, localized oil spills are contained and absorbed as quickly as possible. Generally, absorbent is added until the debris contains no free liquids and can be disposed of as allowed under applicable regulations.

### **7.3 – Steam Cleaning**

Nucor performs steam cleaning in a controlled manner. Steam cleaning is conducted in areas which have adequate containment to hold water and settle solids. No steam cleaning water is allowed to enter the facility's stormwater drainage system.

### **7.4 – Construction Debris**

Nucor periodically undertakes Facility renovation projects, which involve demolition of equipment. Equipment sold for scrap or reuse at other facilities is not classified as solid waste. The portions that are not salvaged or reused are classified as solid waste, and are handled in a manner that minimizes the potential for releases of contaminants to Nucor effluents.

Prior to demolition, Nucor reviews the potential for the resulting debris to contain hazardous materials. If a material is believed to contain potentially leachable material, special case-by-case handling is implemented.

### **7.5 – Scrap Steel**

Processed scrap steel is the primary raw material of the steel making process. Processed scrap is purchased from scrap processors and stockpiled adjacent to the meltshop. A roof is constructed over the most active area of the scrap yard. Runoff from this roof is directed to the plant's storm sewer system.

### **7.6 – Water Conditioning Chemicals**

Nucor uses water treatment chemicals for open and closed loop cooling systems to control scaling, biological growth and maintain desired water quality. Chemicals are purchased and used in 55-gallon drums or portable totes. They are stored within secondary containment structures near the relevant water treatment systems.

### **7.7 – Scale and Slag**

Scale and slag are co-products of steel production. Slag is generated while melting and refining of steel and is composed of mainly metal oxides as well as calcium carbonate. Slag is collected and cooled in several pits within the meltshop before it is transferred to a building on the southwest corner of the facility for additional cooling, crushing and screening. Scale results from the oxidation of the steel when exposed to moisture and oxygen, and consists primarily of oxidized metallic flakes and shavings (i.e., rust). Scale is collected from the bottom of various closed circuit sumps used to clarify plant contact cooling water. Both materials are stored in piles until they are

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resold as a commercial product. Slag and scale are largely inert, but scale may contain trace residues of oil or particulate matter in the form of iron oxide (rust).

#### **7.8 – Diethylene Glycol**

Nucor uses diethylene glycol as a hydraulic fluid. The diethylene glycol is managed as if it were oil. Tanks or drums are generally stored inside and are not exposed to stormwater, or have sufficient secondary containment.

#### **7.9 – Lime, Carbon, and Magnesium Oxide**

Nucor uses lime, carbon and magnesium oxide as an additive in making steel. The majority of these materials are stored in water tight silo/air delivery system. If material leaves the silo/air delivery system, it is cleaned up and reused in a timely manner. There are some amounts of lime and carbon stored in material storage bunkers that are mostly under roof. Material left outside the bunkers during delivery or transport to the processes is collected for reuse.

#### **7.10 – Equipment Storage**

Nucor will periodically store equipment removed from process/production areas. All equipment intended to be stored on site likely to be contaminated with oil or grease shall be stored indoors or under cover to prevent potential stormwater contamination.

#### **7.11 – Rail Yard Equipment and Material**

Nucor operates rail car switching activity as a critical operations process. This operation requires the use of oil or grease lubricated or filled rail switch/operation equipment, creosote/concrete rail ties, and ballast. Oil and grease are used in a manner that minimizes contamination of stormwater. Ties and ballast are stored and used in locations that would prevent runoff from the property of stormwater that has come into contact with the material. However, it may contain trace residues of oil or particulate matter.

### **8.0 – Other Pollution Prevention Practices**

In addition to the material management practices described in the above section, Nucor performs the following activities that are specifically designed to prevent the contamination of stormwater.

#### **8.1 – Sediment and Erosion Prevention Practices**

When possible, unpaved surfaces at the facility are actively vegetated to promote infiltration and minimize surface erosion. Silt fencing or other engineering controls are used during construction activities and around mounded areas as BMPs, when necessary. Each year, additional areas of the plant are paved to reduce sediment runoff on paved roadways.

#### **8.2 – Maintenance of Storm Sewers**

Storm sewers have sediment socks placed below grade under the grates wherever possible. The socks are inspected regularly and replaced when at the end of their useful life.

All storm runoff is directed through the discharge water treatment plant, where it passes through an oil/water separation junction box, sediment settling and filtration. A majority of the water is recycled back through the plant as make-up water as needed.

#### **8.3 – Spill Containment Supplies**

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In the event of a spill of potentially hazardous materials spill containment supplies have been stationed at the locations identified in Figure 1. Proper use of spill prevention supplies is addressed in conjunction with spill prevention training.

## **9.0 – Inspections, Test Procedures, and Training**

### **9.1 – Inspections**

Nucor performs periodic inspections of the site to check the effectiveness of the spill prevention plan. Records of these inspections will be maintained for a minimum of 3 years by the environmental department.

**Table 3 – Spill Prevention Periodic Inspections**

Type	Inspection Frequency
Secondary containment structures	Documented Monthly
Drum storage areas	Documented Monthly
Bulk storage tanks	Documented Monthly
Areas surrounding tanks	Documented Monthly
Spill prevention and cleanup equipment	Yearly and After Use
Effectiveness of Stormwater BMPs	Yearly (see Section 12)
Oil pollution prevention planning (Section 4)	Documented Monthly (Included in secondary containment structure inspection)

### **9.2 – Testing Procedures**

#### **Drums**

Fifty-five-gallon drums will receive an external visual inspection during the monthly secondary containment inspection. The drums are shipped to and from the facility on a regular basis. Since these containers must meet Department of Transportation (DOT) packaging requirements, additional integrity testing will not be performed.

#### **Tanks External Visual Testing/Inspection**

The bulk oil storage tanks listed in Table 2 receive an external visual inspection during the monthly Secondary Containment, Drum Storage area, and Bulk Storage Tanks inspection. All storage tanks at Nucor Steel are shop fabricated and contain less than 30,000 gallons. Therefore, the monthly inspection as listed in this section satisfies the integrity testing requirement

#### **Shell Testing**

All storage tanks at Nucor Steel Seattle mill are shop fabricated and contain less than 30,000 gallons. Therefore, the monthly inspection as listed in this section satisfies the shell testing requirement. However, non-destructive shell testing may be conducted on an “As-needed” basis

#### **Training**

Nucor schedules and conducts training and briefs to assure operating personnel have adequate understanding of spill prevention and the contingency plans. Training is conducted on a yearly basis for all appropriate personnel. Records of this training will be maintained for five year. Training topics include:

- Spill response;
- Applicable SPCC/SWPPP requirements;
- Spill prevention;
- Laws/regulations associated with pollution/discharge control

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- Loading/unloading precautions;
- Dangerous waste and hazardous material management; and
- Recent spill events/discharges, equipment failures, malfunctioning equipment components, and recently developed precautionary measures.

## **10 – Emergency Response**

*Nucor Steel Seattle, Inc. employees are only permitted to respond to spills of chemical which can be cleaned up as part of their normal work or maintenance activities (i.e. Routine Spills).*

### **10.1 – Routine Spills**

These are incidental spills that can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the area and are not considered an emergency. A routine spill does not have the potential to create a health or safety hazard, the spilled material has not entered the stormwater system or considered a “release to the environment”, and is a size that can be cleaned up with resources available at the plant.

If spilled materials have entered the stormwater system or traveled off the plant site contact the Environmental department immediately.

Confirm the area is safe to enter/work in. Check for injured persons and conduct first aid if needed. An immediate call to 911 should be made, if needed.

Double check that the spill can be cleaned up by immediate persons working with the substance using health and safety equipment used during routine work activities. If not, go to non-routine spills.

Contain the spilled material and notify the supervisor of that area and/or the employee involved in the spill. The supervisor of the area/employee is responsible for managing the cleanup of spills in their area, with the guidance from Environmental Department as needed.

Clean up spilled material and dispose per direction from the area supervisor and/or environmental department personnel.

The EC, Environmental Manager, or Environmental Engineer will contact the appropriate City, State or Federal agencies in the event of a reportable spill (any spill of material that meets the reportable quantity threshold for that chemical). The EC, Environmental Manager, or Environmental Engineer should be prepared to provide any information the response operator asks for but must provide at a minimum the following information;

- Your name, the company name, and a call back number
- Location of the facility and exact location of the spill/release
- Date & time of the discharge
- What chemical was spilled and how much was spilled
- If injuries are involved and in evacuation is required
- What actions have been taken to contain/clean-up the spill
- Source of the discharge and description of all affected media

### **10.2 – Non-Routine Spills**

Non-routine spills are considered an emergency. This type of spill cannot be cleaned up or controlled by employees in the area. Outside spill response contractors due to the potential for Health and Safety hazards or the magnitude of the spill.



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Begin evacuation procedures for the affected areas.

The EC, Environmental Manager, or Environmental Engineer will contact an approved emergency response contractor from phone numbers provided Seattle SharePoint Environmental page "Contractor Contact List"

The EC, Environmental Manager, or Environmental Engineer will contact the appropriate City, State or Federal agencies in the event of a reportable spill (any spill of material that meets the reportable quantity threshold for that chemical). The EC, Environmental Manager, or Environmental Engineer should be prepared to provide any information the response operator asks for but must provide at a minimum the following information;

- Your name, the company name, and a call back number
- Location of the facility and exact location of the spill/release
- Date & time of the discharge
- What chemical was spilled and how much was spilled
- If injuries are involved and if evacuation is required
- What actions have been taken to contain/clean-up the spill
- Source of the discharge and description of all affected media

#### **11 – Designated Responsible Person**

The plant Safety and Environmental Manager is the designated person responsible for implementing this Plan. Responsibilities vary based on the nature of the individual jobs throughout the facility. The Safety and Environmental Manager delegates' responsibility for implementing specific requirements associated with discharge prevention of this plan on a day-to-day basis to area production managers.

The individuals who handle petroleum or hazardous materials or wastes are responsible for the safe and proper handling of this material. These people shall follow standard operating procedures concerning the use and handling of these items. Spills must be contained and reported to the area/employees supervisor who will evaluate what further actions are necessary.

The supervisor of the area and/or employee involved in a spill is responsible for completion/submission of the incident report form and managing the spill cleanup activity. Spill response guidance will be available from the Environmental department as needed.

#### **12 – Plan Updates**

Nucor updates the plan as described in this section.

##### **12.1 – Annual Stormwater Sources Update**

Nucor conducts a Monthly Water Inspection documenting any new materials on site or facility modification, which do not have adequate spill prevention planning. If such discharges are identified, additional planning is prepared and implemented. If the new materials, facility modification, or planning are substantial relative to the Nucor NPDES permit, Nucor will request a modification of the NPDES permit within 30 days of the inspection.

##### **12.2 – SPCC Update**

Nucor reviews Section 4, pollution prevention for oil storage tanks used on the site, monthly during the secondary containment inspection (which is included as part of the Monthly Water Inspection), or whenever significant changes to the facility oil tanks have been completed.

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If Nucor detects changes in oil tanks, Section 4 of the plan is updated. If the changes materially affect the facility's potential to cause an uncontrolled release of oil into a navigable waterway, Section 4 of the plan is recertified by a Professional Engineer.

All required reviews and revisions/amendments to this document will be recorded and tracked in the IFS document control program

<b>12.3 – Distribution</b>
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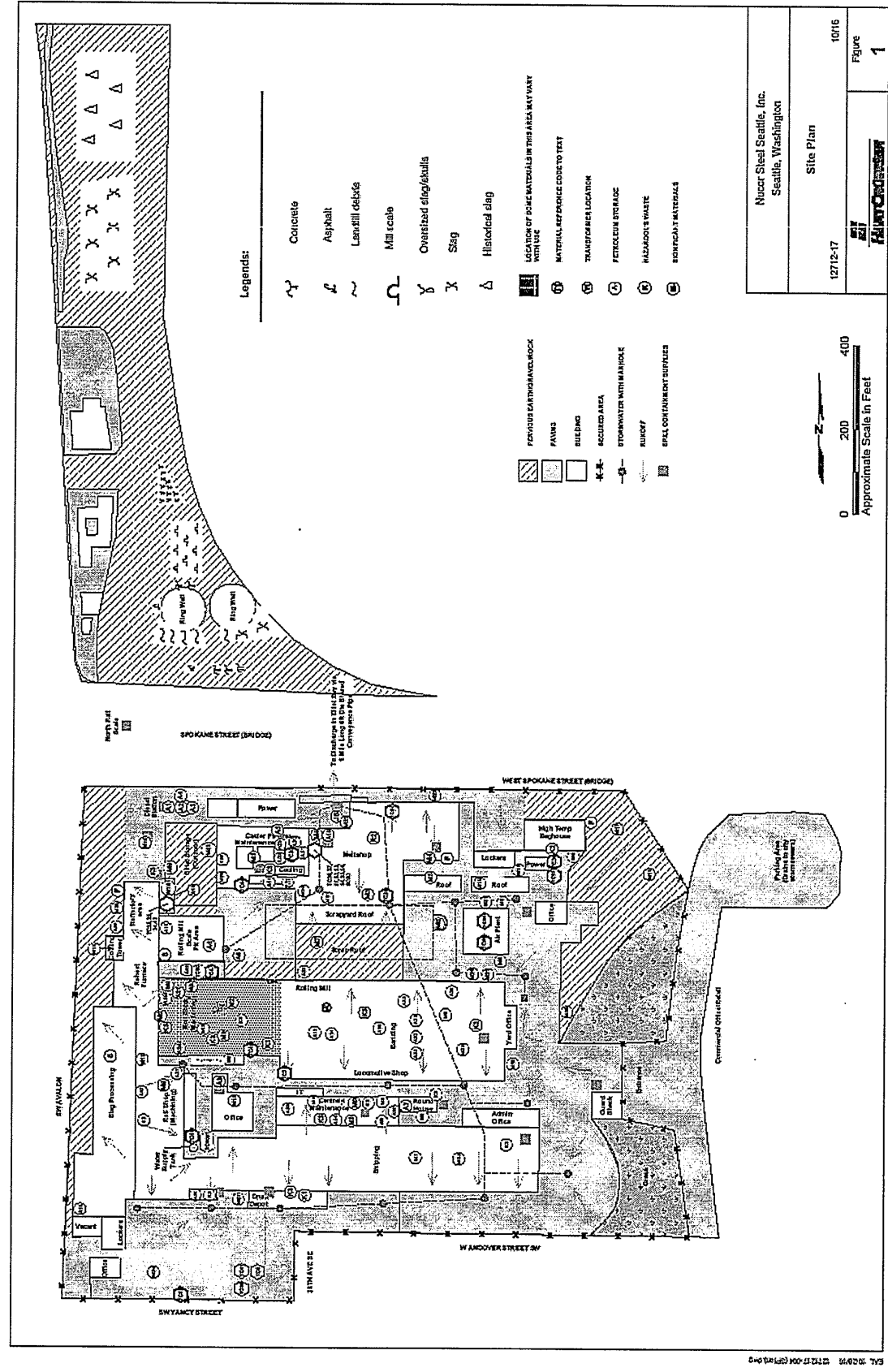
A signed copy of this plan will be kept in the environmental manager's office. A controlled, electronic version of this plan will be made available on site to all personnel.

Copies of this plan are also provided to the Department of Ecology, relevant local emergency response agencies, and the general public (through the Department of Ecology).

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Figure 1 – Facility Map



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**Appendix 1 – Certification of the Applicability of the Substantial Harm  
Criteria**

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ATTACHMENT C-II-CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

FACILITY NAME: Nucor Steel Seattle, Inc.

FACILITY ADDRESS: 2424 SW Anderson St. Seattle, WA 98106

1. Does the facility have an oil storage capacity that is greater than or equal to 42,000 gallons and conduct operations that include over-water transfers to or from vessels?  
☐ Yes  
☒ No *proceed to questions below*
2. Does the facility have an 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 aboveground oil storage tank plus sufficient freeboard to allow for precipitation with any aboveground storage area  
☐ Yes  
☒ No *proceed to next question*
3. Does the facility have an oil storage capacity greater than or equal to one 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 13, for availability) and the applicable Area Contingency Plan.  
☐ Yes  
☒ No *proceed to next question*
4. Does the facility have an oil storage capacity greater than or equal to one 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 would shut down a public drinking water intake?  
☐ Yes  
☒ No *proceed to next question*
5. Does the facility have an oil storage capacity greater than or equal to one million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?  
☐ Yes  
☒ No *proceed to next question*

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: 

Name (please type or print): Patrick Jablonski

Title: Environmental Manager

Date: 6/30/16

Footnotes:

1. If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.
2. For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

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**Appendix 2 – 40 CFR Part 112 Cross-reference (112.7)**

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Citation (All citations are to 40 CFR Part 112)	Regulatory Requirement	Location in Plan
§ 112.5	Amendment of SPCCP	Section 12
§ 112.7(a)(3)	Physical Layout of Facility	Section 2 & Figure 1
§ 112.7(a)(3)(i)	Type of Oil/Capacity	Section 3 & Table A-2
§ 112.7(a)(3)(ii)	Discharge Prevention Measures	Section 5.1 & 4.3, Table A-2
§ 112.7(a)(3)(iii)	Discharge Controls	Section 4.3, 8.2, 8.3, 9, Table A-2, & Figure 1
§ 112.7(a)(3)(iv)	Countermeasures	Section 8.3, 9, 10 Figure 1
§ 112.7(a)(3)(v)	Disposal Methods	Section 10
§ 112.7(a)(3)(vi)	Contact List and Phone Numbers	Section 10, foreword
§ 112.7(a)(4)	Information for Reporting	Section 10.2
112.7 (a)(5)	Emergency Procedures	Section 10
§ 112.7(b)	Discharge Predictions	Figure 1 & Table A-2
§ 112.7(c)	Containment Structures	Table A-2
§ 112.7(e)	Written Inspection/Test Procedures	Section 9
§ 112.7(e)	Records of Inspections/Tests	Section 9
§ 112.7(f)(1)	Personnel Training	Section 9
§ 112.7(f)(2)	Accountable Person	Section 11
§ 112.7(f)(3)	Annual Briefings	Section 9
§ 112.7(g)	Security	Section 2
§ 112.7(h)	Tank Truck Loading/Unloading	Section 5.1
§§ 112.8(b); 112.8(c)(3)	Drainage from Diked Areas/Valves	Section 2.2 & 4.3
§ 112.8(c)(1)	Tank Materials, Construction, Temperature and Pressure	Table A-2
§ 112.8(c)(2)	Secondary Containment Capacity	Table A-2
§ 112.8(c)(2)	Secondary Containment Imperviousness	Table A-2
§ 112.8(c)(4)	Corrosion Protection (Buried tanks)	Section 4.3
§ 112.8(c)(6)	Integrity Testing; Visual Inspections	Section 9.0
§ 112.8(c)(8)	Overfill Protection	Section 4.3
112.8 (c)(9)	Effluent Disposal	Section 4.3
§ 112.8(c)(10)	Prompt Cleanup	Section 4.3 & 10
§ 112.8(c)(11)	Mobile or Portable Containers	Section 4.3, Table A-2, & Figure 1
§ 112.8(d)	Facility Transfer Operations	NA

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**Appendix 3 – Reported Spill Documentation**



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**NUCOR**  
**BAR MILL GROUP**  
**NUCOR STEEL SEATTLE, INC.**

November 9, 2014

Jeanne Tran  
WA State Dept. of Ecology  
3190 160<sup>th</sup> Ave. SE  
Bellevue, WA 98008

SUBJECT: Notice of potential Non-Compliance – Spill of Diesel Fuel on Roadway within Facility.

Dear Ms. Tran:

This notice is being sent to you per Section S3.B.2 of Nucor Steel's NPDES Permit # WA-0031305 and as a follow up to our phone conversation on November 4, 2014.

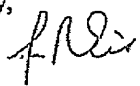
On November 4, 2014 @ 8:45 AM Nucor Steel Seattle discovered an approximate 10 gallon Diesel Fuel spill from a vehicle at the 2424 SW Andover Street Mill Facility. The event occurred following the refueling of a service vehicle. The fuel tank cap had not been replaced after vehicle fueling and the equipment was subsequently driven approximately 1000 feet of facility roadway before the cap was found to be missing from the fuel tank.

The roadway was inspected, at approximately 9:30 am, and found to have visible oil sheen. Nucor dispatched service vehicles from Emerald Services to remove the spill residual from the roadway. This cleanup was completed on November 4, 2014 at 6 PM. The storm water was also inspected and found to have oil sheen in the upstream section of the oil water separator. Oil absorbents from our spill kits were placed in the oil water separator to remove the oil sheen. This cleanup action was completed at 11 am.

Disciplinary actions were with the contract employees involved in the incident. Nucor has also scheduled a Root Cause Analysis (RCA) to determine necessary follow up corrective actions.

This letter shall serve as the written report of this event. Please call myself at 206-933-2205 or Patrick Jablonski at 206-933-2238 if you have any questions or comments.

Respectfully,

  
Jeffrey Eis  
Environmental Engineer  
Nucor Steel Seattle, Inc.