CERTIFICATION AND SIGNATURE

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

Gary Edwards, President and CEO

3/21/2019
Date

2.4.2 Accidental Spill Prevention and Contingency Planning Program

The spill program was designed as a prudent addition to Aqua-Chem's stormwater pollution prevention program. Aqua-Chem realized, while formulating its approach for the spill prevention and contingency planning portion of the SWPPP, that there are two types of spills that could take place at the Knoxville facility: 1) a direct spill to the stormwater drainage system and ultimately to Sand Branch, or 2) a direct release to the publicly owned treatment works (POTW). Aqua-Chem added the POTW spill contingency planning portion as a prevention measure. The Spill Plan has been prepared to meet the spill prevention and contingency planning requirements contained in 40 CFR 403 of the national pretreatment program regulations; is an effort to protect the health and safety of plant and public works personnel in addition to enhancing Aqua-Chem's national pretreatment program compliance efforts; and addresses sudden releases that could damage the POTWs' collection system, interfere with the operation of the treatment plant, and indirectly impact water quality and/or sludge utilization. Spill response equipment is staged where there is a potential for spills of oils and corrosives.

The outside facility spill contingency portion of the Spill Plan is designed to minimize any unplanned sudden or non-sudden release of hazardous constituents to air, soil, or surface water which could threaten public health or the environment. Aqua-Chem has added filters to the Paint Shop fans to prevent overspray from being exhausted and placed filter fabric over the Paint Shop floor to prevent trackout. Paper covering has been placed over the pavement outside the Paint Shop roll-up door to prevent trackout of fresh overspray. Paint equipment consists of airless pumps and HVLP (high volume, low pressure) paint guns. The Paint Shop structure consists of a fully-enclosed building with high efficiency filters on the exhaust. Doors are kept closed during painting operations. The Spill Plan requirements follow guidance outlined in Section 311 of the CWA (40 CFR 112).

The Spill Plan has also been specifically modified to include additional spill prevention and contingency planning requirements for Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313 chemicals. The Spill Plan also addresses relevant requirements of 40 CFR 265 Subpart C and D (*Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities* - Preparedness and Prevention - Contingency Plan and Emergency Procedures).

2.5 Threatened and Endangered Species Protection

I certify that the stormwater discharges, and the construction of Best Management Practices (BMPs) to control stormwater runoff, are not likely to adversely affect legally protected listed or proposed threatened or endangered aquatic fauna or species proposed for such protection.

Signed: _____ Date: 3/21/2019

Name/Title: Gary Edwards/President and CEO

5.0 IDENTIFICATION OF NON-STORMWATER DISCHARGES WITH CERTIFICATION

A thorough investigation of the Knoxville facility's stormwater outfalls was conducted. The original investigation included a closed circuit television (CCTV) search for outfalls potentially containing illicit stormwater connections. The storm sewer on the western side of the facility was shown as being collapsed near its discharge point due to materials handling operations at the adjacent rail line construction yard. However, the CCTV investigation on the eastern side of the facility supported the engineer's conclusion that there is no illicit or improper connection to the storm sewer system. The storm sewer system was in very good condition, indicative of no contact with process wastewater, and dry except for air conditioner condensate.

No changes have been made or observed since the original investigation.

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Gary Edwards, President and CEO

3/21/2019
Date