

Corporate Environmental Policy Document



Document Title	Spill / Release Reporting and Response	Revision Date	5-7-18
Document Control #	CORP-ENV-500	Authored by	T. Saunders
Division	Mohawk Industries Flooring NA	Approved by	D. Wood

I. Purpose

The purpose of this policy is to provide Mohawk Industries facilities with guidance on:

- The types of spills and releases required to be reported to Corporate Environmental to ensure compliance with the following release notification requirements:
 - CERCLA hazardous substances notification (40 CFR 302.6)
 - EPCRA emergency release notification (40 CFR 355 subpart C)
 - Discharge of oil notice (40 CFR 110.6)
 - Other state and local release notification requirements
- Spill and release response actions to protect employees

II. Background

Mohawk Industries facilities use various kinds of solid, liquid, and gaseous materials in its operations. These materials include dyes, inks, acids, cleaners, stain and soil resistant chemistries, hydraulic oils, fuel oil, calcium carbonate, pellets, resins, propane, liquid nitrogen, etc. There is a potential for a spill or release in different areas such as along production lines, boiler rooms, maintenance shops, material unloading areas, and container storage areas. Federal law requires notification of incidents resulting in the release of hazardous substances and oil to the environment.

III. Scope

This policy applies to all Mohawk Industries Flooring NA operations.

IV. Definitions

As referenced in 40 CFR 302.3, the following definitions apply:

- Release means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant).

As referenced in 40 CFR 171.8, the following definitions apply:

- Hazardous material means a substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and has designated as hazardous under section 5103 of Federal hazardous materials transportation law (49 U.S.C. 5103). The term includes hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table (see 49 CFR 172.101), and materials that meet the defining criteria for hazard classes and divisions in 40 CFR 173.

V. Procedure

The following procedures apply to spills and releases of liquid, solid, and gas materials at all Mohawk Industries facilities and operations:

1. Reporting
 - a. The following types of spills or releases should be reported:
 - Any spill or release that occurs, or makes it to the environment, outside of the facility, regardless of the material. This includes liquid chemicals, latex, oil and hydraulic fluids, paints, sanitary wastewaters, and solids like calcium carbonate or pellets.
 - Any hazardous chemical spill or release that occurs inside the facility.
 - Any spilled or released material that enters a sanitary sewer drain, or stormwater drain or conveyance.
 - Any spill or release of a non-chemical that occurs inside the facility and is beyond the control of facility personnel. This includes oil and hydraulic fluid, latex, paints, etc.
 - b. Employees should notify Supervisors or Department Managers, Site Safety, or the Plant Manager immediately upon knowledge of any of the types of spills or releases described above.
 - c. Plant management should notify Corporate Environmental and Safety.
 - d. See **Appendix E** for Corporate Environmental contact information.
 - e. The “Internal Spill / Release Report” form in **Appendix D** should be completed to document a spill or release incident and sent to Corporate Environmental.
2. Response
 - a. See **Appendix A** for response procedures for spills and releases involving hazardous materials
 - b. See **Appendix B** for response procedures for spills and releases involving non-hazardous materials
3. Clean-Up
 - a. See **Appendix C** for clean up procedures

VI. Document Review

This document will be reviewed annually by Corporate Environmental.

VII. Appendices

Appendix A	Hazardous Material Incident Response Procedures
Appendix B	Non – Hazardous Material Incident Response Procedures
Appendix C	Spill and Release Clean Up Procedures
Appendix D	Spill and Release Reporting Form
Appendix E	Corporate Environmental Contacts

Appendix A

Hazardous Material Incident Response Procedures

The following procedures apply to all spills and releases involving hazardous materials:

Employees

- Resist rushing in!
- Notify your supervisor immediately and if necessary activate the facility evacuation (CODE RED)
- Approach incident with caution from upwind, and uphill or upstream
- Attempt to gather information from a distance
- Isolate the hazard area (evacuate and deny entry)
- Do not attempt spill or release response, containment, or cleanup
- If you can safely control the spill or release by cutting off a valve or switch from a safe and uninvolved location do so

Plant Management

- Immediately notify Corporate Environmental and Safety
- If necessary activate the facility evacuation (CODE RED) and direct security to call 911
- If possible and safe to do so, positively identify the material and quantity spilled before leaving the area
- If the spill or release is small and can be cleaned up immediately by area personnel without the need for special equipment or outside assistance, direct cleanup operations as needed following all recommendations for safety and using the response procedures found in **Appendix C** of this document
- Further response actions and cleanup direction will be given by Corporate Environmental based on the incident factors

Appendix B

Non – Hazardous Material Incident Response Procedures

The following procedures apply to all spills and releases involving non-hazardous materials:

Employees

- Immediately notify your Supervisor, Department Manager, Site Safety, or Plant Manager
- Do not attempt spill or release response, containment, or cleanup unless you work in the area where the spilled or released material is used; then only if:
 - ✓ The spill or release is small enough to not require outside assistance or specialized cleanup equipment
 - ✓ Wearing appropriate personal protective equipment and following the response procedures found in *Appendix C* of this document.

Plant Management

- Immediately notify Corporate Environmental and Safety
- If the spill or release is a small enough that it can be cleaned up by area personnel without the need for outside assistance or specialized material or equipment, direct cleanup operations as needed using the response procedures found in *Appendix C* of this document.
- Further response actions and cleanup direction will be given by Corporate Environmental based on incident factors

Appendix C

Spill and Release Clean Up Procedures

The following procedures should be followed when responding to spills and releases.

1. Check for and prevent further injuries	<ul style="list-style-type: none">• Evacuate surrounding areas if necessary• Notify 911 emergency personnel if necessary• Review the SDS for material properties, hazards, first aid measures, necessary PPE, and accidental release procedures• If safe to do so, assist injured employees• Limit access to the spill area using protective barriers or signs• Extinguish sources of ignition• Terminate power sources
2. Safely stop the release if possible	If safe to do so, attempt to control or stop the leak or release by: <ul style="list-style-type: none">• Closing or turning off a valve• Plugging a leak in a damaged container• Turning upright an overturned container• Transferring material from damaged container to another suitable container
3. Contain the spill from spreading	If safe to do so: <ul style="list-style-type: none">• Use absorbent material or spill socks to contain the spill as much as possible• Prevent the spill material from entering a storm or sewer drain by using drain mats or covers, or placing socks or absorbent material around the drain
4. Cleanup	Corporate Environmental will provide cleanup direction based on the type of material spilled or released and other incident factors: <ul style="list-style-type: none">• Use of absorbents to soak up liquids which can then be collected into appropriate container for disposal• Use of shop vac or pump to transfer spilled or released material into an appropriate container for disposal• Do not dispose of any absorbent materials, residue, or wastes from clean-up without first checking with Corporate Environmental• Waste and clean-up materials may require disposal according to federal, state, and local regulations

Appendix D

Spill and Release Reporting Form

Use this form for documenting incidents of spills and releases. Please complete all applicable fields below and email the form back to Corporate Environmental.

Facility				Reported by		
Date		Time	AM <input type="checkbox"/> PM <input type="checkbox"/>	Incident type	<input type="checkbox"/> Spill <i>or</i> <input type="checkbox"/> Release	
Name or type of material						
Location of incident						
Describe the extent of the incident using the boxes below, checking all that apply.						
Media affected					Estimated amount	Units
<input type="checkbox"/>	Sanitary sewer					
<input type="checkbox"/>	Pavement outside the building					
<input type="checkbox"/>	Soil					
<input type="checkbox"/>	Air					
<input type="checkbox"/>	Stormwater drainage system					
<input type="checkbox"/>	Waterway (specify)					
<input type="checkbox"/>	Other (specify)					
<input type="checkbox"/>	None (completely contained inside building or secondary containment)					
Any damage or injuries reported?		<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)				
Any evacuation needed?		<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)				
Describe cause of incident (use additional pages as necessary)						

Describe corrective actions taken to stop, remove, and mitigate the incident (use additional pages as necessary)

Individuals and Agencies Contacted

Mohawk Personnel		Time
Emergency response or cleanup contractor		Time
National Response Center		Time
State agency		Time
Other		Time

Appendix E

Mohawk Corporate Environmental Contacts				
Name	Title	Office	Cell	Home
Denise Wood	V.P. Corporate Environmental	706-272-4933	706-280-6779	706-226-8770 828-644-5616
Rebecca Bolden	Director Corporate Environmental	706-272-4934	706-581-3162	423-326-5367
Tyler Saunders	Environmental Engineer	706-272-4935	706-847-9805	706-581-2727
Audrey Phillips	Environmental Engineering Coordinator	706-272-4938	706-847-9083	706-934-4825
Miles Jorgensen	Environmental Engineer	706-272-4939	706-270-2574	423-598-9297