

function — *of beauty*

PA FoB-10- Spill Prevention, Control, and Countermeasure Plan

FOB-EHS-022-1

Function of Beauty
5570 Snyderstown Rd.
Paxinos, PA 17824

PA FoB-10- Spill Prevention, Control, and Countermeasure Plan

1.0 Purpose

Function, Inc. is committed to reducing hazards and providing a safe and environmentally friendly workplace. This includes the prevention of contaminating the waste water, storm water, and earth around the location.

2.0 Scope

The scope of this is to provide spill prevention, control, and countermeasure plans for any potential environmental release. This program will help to reduce and eliminate any potential risks for any wastewater/ storm water pollution to occur and contaminate the local area surrounding the Pennsylvania Paxinos Function location.

3.0 Name of Facility

Function, Inc DBA Function of Beauty. (Function)(FOB10)

4.0 Location

Function, Inc has a location located in Pennsylvania at:
5570 Snyderstown Rd.
Paxinos , PA 17824

5.0 Responsible Persons

The following individuals are direct contacts for and responsible individuals for implementation and ensuring this plan is upheld.

5.1 Director of Environmental Health and Safety

Edward Nolter - ednolter@functionofbeauty.com

5.2 FOB 10 - PA Environmental Health and Safety Specialist

Jeff Brown - jeffbrown@functionofbeauty.com

5.3 Senior Operations Supervisors

1. Josh Thomas - jt@functionofbeauty.com

2. JR Murray - jr@functionofbeauty.com

5.4 Employees- Employees are to ensure to follow all environmental and safety policies implemented at Function, Inc.

6.0 Operation

Function, Inc. works with the initial batch production of hair product bases.

7.0 Types of Waste Generated

7.1 Residual Waste

7.1.1 Industrial Plant Trash

7.1.2 Waste water

7.1.3 No longer used non-haz chemicals

- 7.2 Hazardous Waste
 - 7.2.1 Hazardous expired chemicals
 - 7.2.2 Hazardous chemicals no longer in production
- 7.3 Recycling
 - 7.3.1 bottles and plastics
 - 7.3.2 cardboard/ boxes
 - 7.3.3 Emptied barrels with no residual waste in them
- 7.4 Regulated Medical Waste
 - 7.4.1 Agar plates
 - 7.4.2 Pipettes, needles, syringes
- 8.0 **Residual Waste**
 - 8.1 **Waste Water storage and drainage**
 - 8.1.1 Waste Water from all drains in the manufacturing areas as well as the mixing tanks will go directly into the public sewer system. Unless otherwise specified in this plan.
 - 8.1.1.1 By request of the township of Paxinos , PA a defoaming agent will be added into the waste stream in accordance with defoaming procedures.
 - 8.1.2 Other liquid residual waste or waste water may be stored in totes. Totes will remain inside covered buildings at all times. In the event 2 totes are full of waste the Waste hauler will be contacted immediately.
 - 8.1.2.1 In the event residual waste is not able to be disposed of in the public sewer system the Residual/ Wastewater hauler will be immediately contacted to set a time to have the waste taken off site once there are ample amounts of filled totes on hand.
 - 8.1.3 Wastewater will never remain on site for longer than 1 year.
 - 8.1.4 Residual Waste totes will not be moved to storage or be outside at any time in the event there is any precipitation.

8.2 Residual Waste Hauler

Rich Wimmer

<https://www.eldredgeinc.com/>

Eldridge Inc.

898 Fern Hill Rd.

West Chester, PA 19380-4202

(Office) 610-436-4202

(Emergency) (484-459-5559)

8.3 Waste Water Generation

8.3.1 WasteWater is generated from tank flushing/ rinsing of base material in tanks. Waste water will also be generated from pouring out of the finished product prior to the mixing step.

8.3.2 Volume of Wastewater- Function, Inc intends to generate roughly 1000 gallons of wastewater a week.

8.4 (Residual) Industrial Plant Trash Storage

8.4.1 Plant trash will be kept in a roll-off dumpster that will be kept outside.

8.4.2 Roll-offs dumpsters will be only accepted for the site with no damage/ punctures

8.4.3 Roll-offs dumpsters will remain covered at all times.

8.5 Plant Trash Hauler

8.5.1 Hauler is contacted once the rolloff is around 75% capacity.

8.5.2 Foughts Disposal Services is the site designated plant trash hauler.

2705 Snyder Ave.

Bloomsburg, PA 17815

570-784-576

<https://www.foughtsdisposal.com/>

8.6 Trash Generation

8.6.1 Trash in this container will be industrial plant trash. This can be any item that has been potentially contaminated with any residual waste from the manufacturing process.

8.6.2 Estimate of waste removed on a monthly basis is 5 tons.

8.6.3 Trash is not left on site for any longer than 1 year.

8.7 No longer used chemicals Storage

8.7.1 Chemicals will be kept inside Function buildings at all times.

8.8 Hazardous Chemical Disposal Service - Eldredge

8.8.1 Eldredge will handle all hazardous and non-hazardous chemical hauling offsite.

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8.9 No longer used chemicals generation

8.9.1 These are chemicals that may have been partially used or are residual waste after being emptied into the manufacturing process.

9.0 Recycling

9.1 Storage

9.1.1 Plastics are thrown in a covered container located outside the facility. Plastics are emptied/ clean prior to being placed in the rolloff.

9.1.2 Cardboard is placed in a separate rolloff free of plastics or residual waste.

9.2 Hauler

2705 Snyder Ave.

Bloomsburg, PA 17815

570-784-576

<https://www.foughtsdisposal.com/>

9.3 Generation

9.3.1 Multiple items and products come to the facility in boxes/ cardboard.

9.3.2 The cardboard discarded here will have no contamination to it.

9.4 Any drums/ barrels that are clean of any residual product will be removed through a 3rd party company to be recycled.

10.0 Regulated Medical Waste (RMW)

10.1 Storage

- 10.1.1 RMW is kept in the Hazardous Waste Storage / Removal room. Signage is posted on the door to notify all of the contents of the room.
- 10.1.2 RMW items are kept in a labeled Biohazard box with 2 layers of Red biohazard bags inside them.
- 10.1.3 RMW items are also kept in sharp-proof biomedical waste containers and disposed of in the same box.
- 10.1.4 Labeling for identification of RMW is on the box as well.
- 10.1.5 Once a box is filled it is closed and left segregated in the shipping/receiving area.
- 10.1.6 RMW does not remain on site for any longer than 30 days.

10.2 Hauler

- 10.2.1 Pickups of RMW are completed as needed.
- 10.2.2 Ultimate Haulers are kept on file with manifests

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10.3 Generation

- 10.3.1 RMW is generated by emergency medical response.
- 10.3.2 It is labeled RMW.

11.0 Spill Prevention, Control, Countermeasure

- 11.1** All totes or drums will have all caps/ bungs tightly closed any time they are:
 - 11.1.1 Being moved or transported
 - 11.1.2 Outside a Function Building (in the event they have been emptied and are being prepared to be taken to another building for storage and ultimate hauler removal)
- 11.2** All totes or drums will remain inside buildings at all times unless specified in 11.1.2.

- 11.2.1 In the event a tote of residual waste is full and needs to be moved for holding, a member of management must be present to oversee the operation.
- 11.3** Any containers on site will remain in good working order if they are in use. This will include roll offs. Containers will remain free of any punctures, rust, damage, or defects.
 - 11.3.1 Should Containers have defects, they will be marked as Out of Service and no longer used.
- 11.4** All residual trash will remain in a covered container/ roll-off dumpster(s).
- 11.5** All internal floor drains in the warehouse and other chemical storage areas will be blocked and covered unless otherwise needed for flushing lines or draining kettles.
- 11.6** External storm drains will be kept clear to ensure they are working adequately on site.
- 11.7 Administrative Controls**
 - 11.7.1.1 A member of management performs a daily walk to audit and identify any unforeseen environmental exposures.
 - 11.7.1.2 Supervisors will perform a weekly check to ensure no exposures.
 - 11.7.1.3 All management will be trained on identifying environmental exposures or risks on site.
- 11.8** FOB 10 will have a minimum of 5 Spill Kits that are easily identified with signage.
 - 11.8.1 Spill Kits will be checked following use and resupplied as needed.
 - 11.8.2 Spill kits will contain at a minimum:
 - 11.8.2.1 Heavyweight sonic bonded pads, sorbent socks, disposal bags and ties, nitrile gloves, safety goggles, overpack drum with lid.
- 11.9 Should a spill occur:**
 - 11.9.1 Employees are to immediately contain the spill, if it is safe to do so, and contact a member of management.
 - 11.9.2 Management will begin to coordinate the cleanup.
 - 11.9.3 In the event the VP of Operations, EHS Director, or Safety Specialist is not on site, they will be contacted and will be briefed on the spill in the following order:

- 11.9.3.1 Safety Supervisor
- 11.9.3.2 EHS Director
- 11.9.3.3 VP of Operations
- 11.9.4 These individuals, with the site management rep, will make the determination for the need to contact the regulatory agency and / or emergency spill response.
- 11.9.5 In the event the spill has been determined too large to handle internally a 3rd party spill company has been identified and will be used for Emergency Spill Response:

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- 11.9.6 After any spill a full investigation will be performed by the EHS Department and will include:
 - 11.9.6.1 Determination of root cause(s).
 - 11.9.6.2 Immediate corrective action(s)
 - 11.9.6.3 Potential long term corrective actions

12.0 Documentation

- 12.1 A copy of all spill reports and investigation including reporting documents will be kept by the EHS Department.

13.0 Training

- 13.1 The site EHS Department will roll out this plan to the Pennsylvania FoB -10 Site.
- 13.2 Managers will be responsible for the implementation in their areas.
- 13.3 Supervisors and line leads will be responsible for the roll out to all hourly level employees.
- 13.4 All employees on site will be trained on the following items:
 - 13.4.1 Identification of environmental hazards
 - 13.4.2 Understanding how to prevent environmental hazards
 - 13.4.3 Proper storage of waste on site
 - 13.4.4 Proper spill cleanup procedures
 - 13.4.4.1 Including notifications needed.

14.0 Appendices

14.1 FoB 10 Extremely Hazardous Substances Map (Attached)

15.0 Document Review and Approval

15.1 **Date Devised:** 5-19

15.2 **Reviewed Date:** 06-23

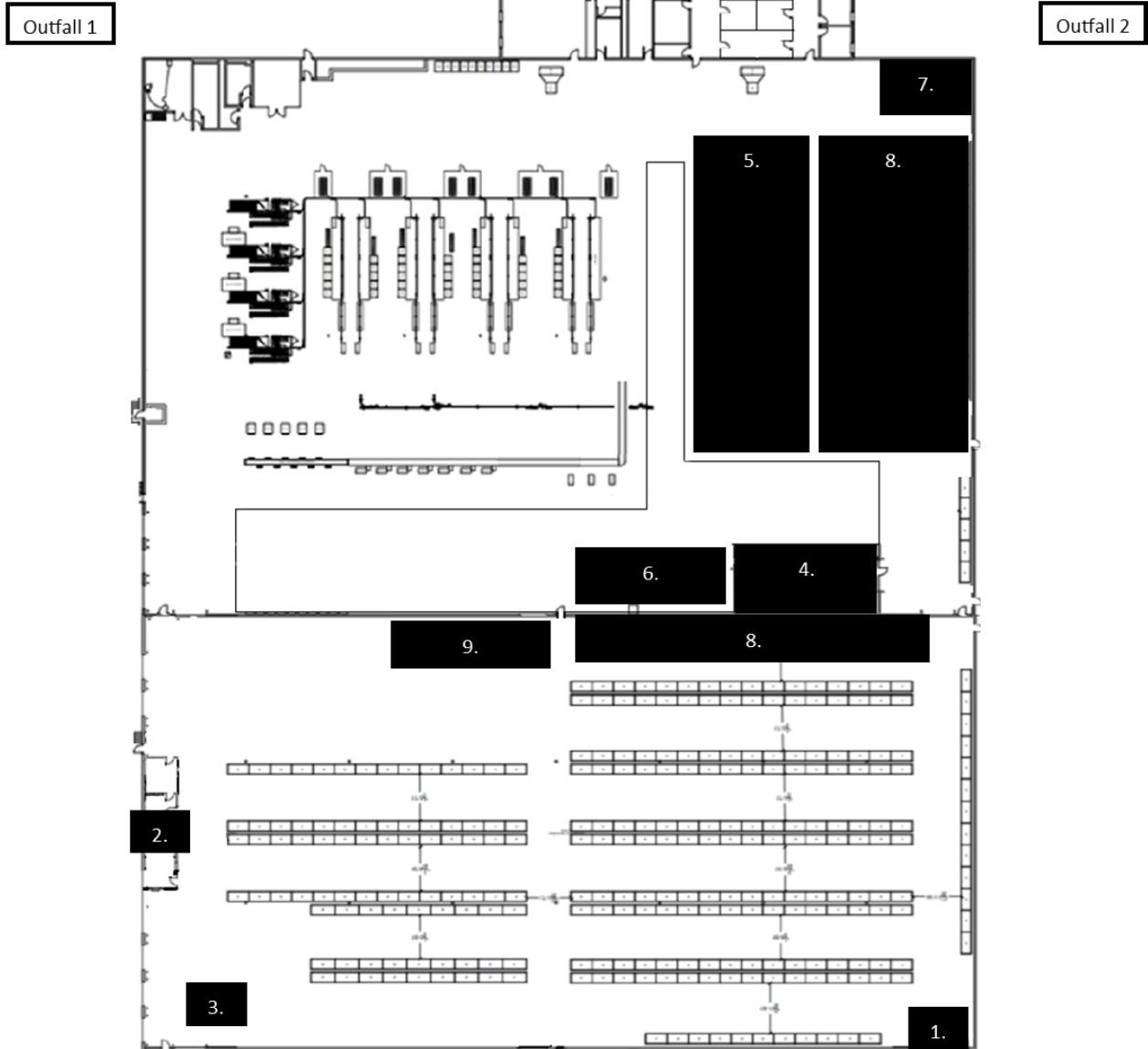
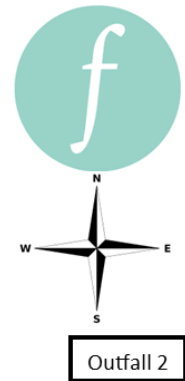
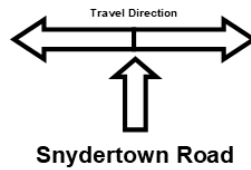
15.3 **Date Approved:** 06-23

15.4 **Approved By:** Ed Noter, Director, EHS

Site Map
FoB 10 SPCC Plan

Function of Beauty
5570 Snyderstown Rd.
Paxinos, PA 17824
PATTS ID # 36411

Lat.040°52'23"N Lon. 076 35'21"W
Lat.040°52'24"N Lon. 076 35'12"W



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|------------------------------------|----------------------------------|---------------------------------|
| 1. Clean In Place Chemical Storage | 4. Microbiology / Chemistry Labs | 7. R.O. Water Filtration System |
| 2. Hazardous Waste Storage | 5. Batch Making | 8. Raw Materials Storage |
| 3. Residual Waste Storage | 6. Hair Goals / R&D | 9. Welding / Cutting / Grinding |