

PREPARED BY

Westwood

PREPARED FOR:

Hoffman Falls Wind LLC

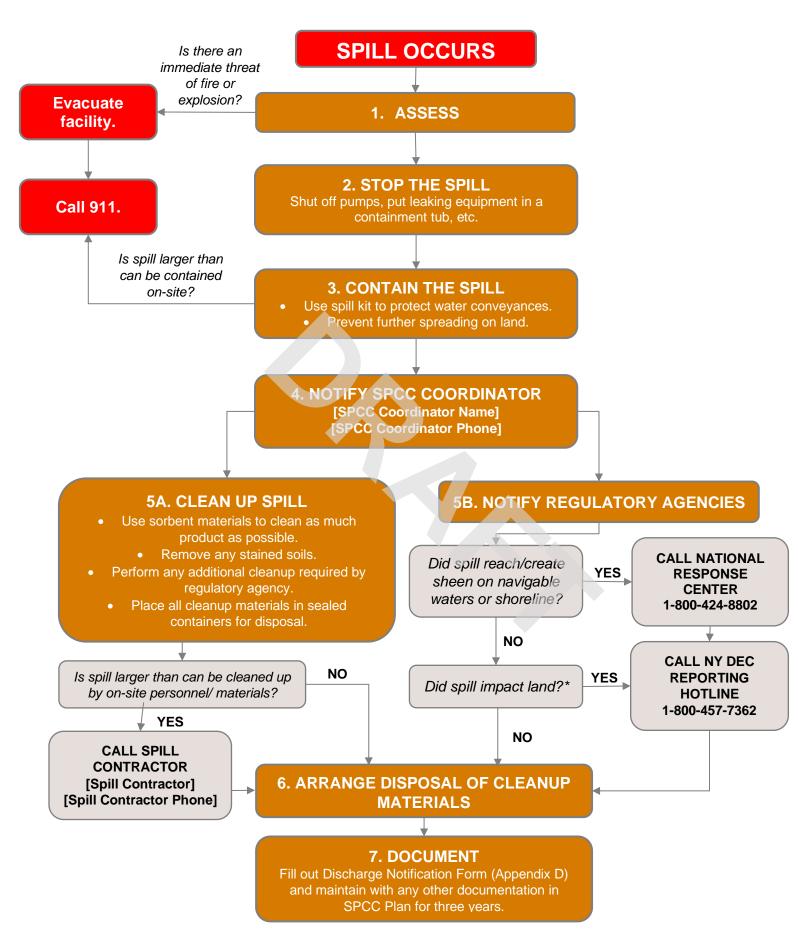
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NOTE: This flow chart is to be used for reference only. Please refer to full SPCC Plan text for detailed response instructions.

*Only spills that meet **all** the following criteria need not be reported: 1. Quantity is known to be less than 5 gallons AND 2. The spill is contained and under the control of the spiller AND 3. The spill has not and will not reach the State's water or any land (ie, occurred on an impervious surface) AND 4. The spill is cleaned up within 2 hours of discovery.

1.0 INTRODUCTION

1.1 Purpose

This Preliminary Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for *[General Contractor]* for the construction of the Hoffman Falls Wind Project (Project) site located in Madison County, New York ("Facility," see <u>Facility Location Figures</u>). The Facility is being constructed as a wind energy generation facility.

The purpose of this SPCC Plan is to describe the procedures, methods, equipment, and other requirements that are used to prevent the discharge of oil from non-transportation related facilities into or upon navigable waters of the United States or adjoining shorelines, or that may affect natural resources belonging to, appertaining to, or under the exclusive management of the United States, and to minimize and abate hazards to human health and the environment should such an event occur.

SPCC Plans are prepared and implemented according to United States (U.S.) Environmental Protection Agency (EPA) regulations contained in Title 40, Code of Federal Regulations, Part 112 (40 CFR 112). A non-transportation related facility is subject to SPCC regulations if: the total aboveground storage capacity exceeds 1,320 gallons; or the underground oil storage capacity exceeds 42,000 gallons; and if, due to its location, the facility could reasonably expect to discharge oil into or upon the navigable waters of the United States. At this Facility, as defined in 2.1 Description of the Facility, the total aboveground oil storage capacity is more than 1,320 gallons; therefore, SPCC regulations apply.

The threat of substantial harm caused by the Facility has been evaluated and certified by [General Contractor] management. It has been determined that this Facility does not pose a risk for substantial harm and that preparation of a Facility Specific Response Plan, pursuant to 40 CFR 112.20, is not required. The Substantial Harm Determination certification is included as Appendix A: Substantial Harm Determination.

1.2 Professional Engineer Certification

I certify that I am the preparer of this SPCC Plan or it was prepared under my direct supervision.

Furthermore, I certify the following with respect to this Federal SPCC Plan:

- I am familiar with the applicable requirements of 40 CFR Part 112;
- I have visited and examined the Facility or have supervised examination of the Facility by appropriately qualified personnel;
- This SPCC Plan has been prepared in accordance with good engineering practices;
- The procedures for required inspections and testing have been established; and
- The SPCC Plan is adequate for the Facility as herein described.

This certification in no way relieves the owner or operator of the Facility of his/her duty to prepare and fully implement the SPCC Plan in accordance with the requirements of 40 CFR Part 112.

Alejandro Alvarado New York PE #101100 214-473-4648

1.3 Management Certification of the SPCC Plan

The Owner of the Hoffman Falls Wind Project is Hoffman Falls Wind LLC. Hoffman Falls Wind LLC has engaged [General Contractor] as the General Contractor for the Project. This SPCC Plan is being managed by [General Contractor] and applies to the construction of the Project. Hoffman Falls Wind LLC will prepare a separate SPCC Plan for the operation of the Project that will go into effect once construction is complete.

[General Contractor] is committed to preventing discharges of oil into navigable waters of the United States or adjoining shorelines, or that may affect natural resources belonging to, appertaining to, or under the exclusive management of the United States through implementation and regular review and amendment to the SPCC Plan during construction of the Hoffman Falls Wind Project. [General Contractor] has committed the necessary resources to implement the measures described in this SPCC Plan.

I am the designated SPCC Emergency Coordinator and am responsible for implementation of this SPCC Plan. To the best of my knowledge, this SPCC Plan is accurate.

[General Contractor Representative] [General Contractor], [General Contractor Representative Title] [General Contractor Representative Phone]

1.4 Location of the SPCC Plan

A complete copy of the SPCC Plan will be maintained at the Facility when the Facility is normally attended at least four (4) hours per day or at the nearest field office when the Facility is attended less than four (4) hours per day.

Table 1-1: Location of SPCC Plan

General Location of the Plan	Laydown Yard
Hours Location is Attended	[Hours and Days of Construction]
Specific Location of the Plan	Main office area in the [General Contractor] construction trailer in the Laydown Yard
Location of Notices Regarding SPCC Plan	Notice of the location of the SPCC Plan will be posted on the Project information board in the Laydown Yard.

1.5 Plan Review

Review and amendments to the SPCC Plan must be made as stated in 40 CFR 112.5 under any of the following circumstances:

- Complete a review and evaluation of the SPCC Plan at least every five (5) years;
- There is a change in Facility design, construction, operation, or maintenance that materially affects the Facility's potential for discharge of oil into navigable waters of the United States or adjoining shorelines, or that may affect natural resources belonging to, appertaining to, or under the exclusive management of the United States; and
- In the event of a spill into waters of the United States or adjoining shorelines, or that may affect natural resources belonging to, appertaining to, or under the exclusive management of the United States.

As a result of the review listed above, the SPCC Plan will be amended within six (6) months to include more effective prevention and control measures for the Facility, if applicable. Amendment will be implemented as soon as possible, but no later than six (6) months following the SPCC Plan amendment.

The review and evaluation must be documented in a Plan Review Log, the form of which is contained in the <u>Appendix B: Plan Review Log</u>. The Plan Review Log must state whether the SPCC Plan will be amended. Any technical revision to the SPCC Plan must be certified by a Professional Engineer in New York.

1.6 SPCC Provision Cross-Reference

This SPCC Plan does not follow the exact order presented in 40 CFR Part 112. The table below presents a cross-reference of Plan sections relative to the applicable parts of 40 CFR Part 112.

Table 1-2: SPCC Cross Reference

Provision	Plan Section	Page
112.3(d)	1.2 Professional Engineer Certification	<u>3</u>
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112.7(a)(3)	3.1 Facility Layout Diagram and Remote Sites	<u>13</u>
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112.7(j)	3.12 Conformance with State and Local Applicable Requirements	<u>21</u>
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Table 1-2: SPCC Cross Reference

Provision	Plan Section	Page
112.8(c)(2)	3.5 Containment and Diversionary Structures	<u>15</u>
112.8(c)(3)	3.4 Containment Drainage	<u>15</u>
112.8(c)(6)	3.7 Inspections, Tests, and Records	<u>16</u>
112.8(c)(8)	3.5 Containment and Diversionary Structures	<u>15</u>
112.8(c)(10)	3.7 Inspections, Tests, and Records	<u>16</u>
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2.0 GENERAL FACILITY INFORMATION

2.1 Description of the Facility

Table 2-1: Facility Information

Owner Information				
Owner Legal Entity	Hoffman Falls Wind LLC			
Owner Best Contact	Andy MacCallum			
Address	90 State Street, Albany, NY 12207			
Owner Best Contact Phone and Email	1-902-877-5622; amaccallum@liberty-renewables.com			
Operator Information				
General Contractor Company	[General Contractor]			
General Contractor On-Site Representative	[General Contractor Representative]			
Address	[General Contractor Address]			
General Contractor Phone; On-site Manager Email	[General Contractor Representative Phone]; [General Contractor Representative Email]			
Facilities Include:				
Laydown Yard	[TBD] Acres			
Substation	0.5 Acres			
Batch Plant	3.0 Acres			
Remote Sites	24 Turbines			
Facility				
Facility Address	[Site Address], [Site City], NY [Site Zip Code]			

The Facility is located in Madison County, New York, northwest of the town of Morrisville. Construction of the Facility will include 24 wind turbines, one (1) meteorological tower, one (1) aircraft detection lighting system (ADLS) tower, three (3) temporary laydown yards, a temporary batch plant, an operations and maintenance (O&M) facility, access roads, and a substation. The Facility covers a total of approximately 4,000 acres; however, construction activity will disturb an area consisting of approximately 500 acres consisting of both temporary and permanent improvements.

This SPCC Plan has been prepared to cover the distinct areas where oil will be used and stored, including the Laydown Yard, Batch Plant, Substation, and individual turbine sites (referred to as "Remote Sites").

Oil products for use during project construction will primarily be stored at one of the temporary construction laydown yards, referred to as the "Laydown Yard". The Laydown Yard will consist of construction trailers that are used by Hoffman Falls Wind LLC, [General Contractor], and other subcontractors, parking areas, staging areas, and oil storage areas. An aggregate surface will be installed for the Facility to be used for storage, supplies, and equipment. The Laydown Yard will serve as the Facility operations center during construction and will be equipped with a reliable communications center for directing response operations. Access to the Laydown Yard will be verified once the primary laydown yard is determined.

The Batch Plant will be the site of concrete mixing operations at the Facility. Oil products will be stored and used at the Batch Plant to support mixing operations and to fuel vehicles. An aggregate surface will be installed for the facility for the equipment, vehicle traffic, and material storage. Access to the Batch Plant is from Old County Road approximately 0.2 miles north of its intersection with Stone Bridge Road.

The Substation will consist of a main power transformer, associated control and distribution equipment, an underground electrical transmission system for the turbines, an aggregate surface, and a perimeter fence. Access to the Substation is northwest of the turbines off of Cody Road (42°57′53.25″N, 75°45′6.72″W).

The Remote Sites will consist of up to twenty-four (24) wind turbines. At the Remote Sites, construction will include using distinct crews for the construction of each component of the turbines. The crews move from turbine site to turbine site as the construction progresses, and may be at 2-3 sites per day. The number of active turbine construction sites varies, but typically there may be construction occurring at up to approximately twenty-four (24) different sites. Oil storage will be located in each turbine's gearbox and hydraulic unit, both which will be contained within the turbine itself.

Locations of all of the Facilities are shown in the Facility Location Figures.

2.2 Administration of Responsibility

To fully implement this SPCC Plan, the assistance and cooperation of multiple parties is required. The following descriptions outline key roles and responsibilities involved in the implementation of this SPCC Plan.

Owner Legal Entity

Hoffman Falls Wind LLC is the owner of the Hoffman Falls Wind Project. Hoffman Falls Wind LLC has engaged [General Contractor] as the General Contractor for the Project.

General Contractor Company

[General Contractor] is the General Contractor for the construction of the Hoffman Falls Wind Project. [General Contractor] is responsible for the construction of the wind turbines, meteorological tower, ADLS tower, associated access roads, laydown yard, batch plant, substation, and electrical collection and transmission. [General Contractor] will engage an oil company to supply fuel for the project. Specific responsibilities include:

- Serve as SPCC Emergency Coordinator;
- Perform inspections to ensure compliance with the provisions of this SPCC Plan;
- Coordinate training and maintain training records;
- Maintain the Safety Data Sheets (SDS) sheets;
- Maintain security of oil storage areas;
- Notify the Owner of any releases:
- Investigate oil releases;
- Provide the proper notification for environmental releases;
- Ensure corrective action is taken in the event of a release;
- Coordinate disposal of waste materials;
- Ensure that emergency response equipment is available and working properly;
- Update the SPCC Plan as required;
- Ensure those who work with oil on the Project are aware of and follow the requirements of this SPCC Plan;
- Follow the established policies and procedures of this SPCC Plan; and
- Enforce the requirements of the SPCC Plan and have overall responsibility of the Project and SPCC Plan requirements.

Subcontractors

Subcontractors will be selected for the construction of the operations and maintenance facility, rebar installation, and turbine electrical equipment. Subcontractor responsibilities include:

- Follow the established policies and procedures of this SPCC Plan;
- Adhere to fuel transfer procedures established in the SPCC Plan;
- Ensure the personnel have appropriate training; and
- Inform [General Contractor] of any releases and ensure that corrective action is taken.

2.3 Oil Storage

An inventory of the products stored at the Facility is shown below. All containers including turbine components with a capacity of fifty-five (55) gallons or more are included, unless otherwise exempt from the rule.

Oil containers used at this Facility are constructed of steel or plastic. The design and construction of all bulk storage containers is compatible with the characteristics of the oil product they contain and with applicable temperature and pressure conditions.

Table 2-2: Oil Storage Inventory

					Party
Capacity (gallons)	Quantity	Content	Storage Container	Secondary Containmen	Responsible for Oil
Laydown Yard					
TBD	TBD	TBD	TBD	TBD	[General Contractor]
O&M Facility					
TBD	TBD	TBD	TBD	TBD	[General Contractor]
Substation					
TBD	TBD	TBD	TBD	TBD	[General Contractor]
Batch Plant					
TBD	TBD	TBD	TBD	TBD	[General Contractor]
Remote Sites					
TBD	24	Gearbox Oil	WTG Gearbox	Turbine Nacelle	[General Contractor]
TBD	24	Hydraulic Oil	Hydraulic Unit	Turbine Nacelle	[General Contractor]
TBD	24	Mineral Oil	Padmount Transformer	TBD	[General Contractor]

2.4 Discharge Potential

The overall project area is divided between five (5) major receiving waterbodies: Chittenango Creek, Oneida Creek, Blue Creek, Callahan Brook, and Morrisville Swamp. The Facility has multiple discharge points to the receiving waters, but the runoff directly from the disturbed areas is generally non-point discharges via overland flow. The discharge potential from each oil storage area is summarized below and shown on the <u>Facility Drainage Figure</u>.

The Laydown Yard is located on relatively flat terrain and consists of compacted gravel surfaces. Potential discharges from oil storage areas would flow east within the Laydown Yard. Runoff from the area ultimately drains east towards the Chittenango Creek, located approximately 1,000 feet east of the Laydown Yard.

The Batch Plant is located on relatively flat terrain and consists of compacted gravel surfaces. Potential discharges from oil storage areas would flow south within the Batch Plant. Runoff from the area ultimately drains south towards Callahan Brook, located approximately 1,700 feet south of the Batch Plant.

The Substation is located on moderately sloping terrain and consists of compacted gravel surfaces. Potential discharges from oil storage areas would flow north within the Substation. Runoff from the area ultimately drains northeast towards an unnamed tributary of the Oneida Creek, located approximately 3,800 feet northeast of the Substation.

Due to the remote nature and large quantity of turbine sites, drainage patterns vary for each Remote Site. However, it is unlikely that simultaneous discharges will occur at multiple turbine sites. If a discharge reaches a navigable water, the priority is to control it before it discharges downstream to other water uses.

Because this is a new construction project, there is no previous history of any discharge at the Facility.

3.0 DISCHARGE PREVENTION

The following measures must be implemented to prevent oil discharges during the handling, use, or transfer of oil products at the Facility. Oil-handling employees must receive training in the proper implementation of the measures.

3.1 Facility Layout Diagram and Remote Sites

The Drainage Map is attached in the <u>Facility Location Figures</u>. Facility Layout Diagrams are attached for each of the facilities described above which show the location of storage tanks and general layout. As required under 40 CFR 112.7(a)(3), the Facility diagrams indicate the location and contents of aboveground storage tanks (ASTs), underground storage tanks (USTs), and transfer stations and connecting piping.

3.2 Spill Reporting Procedures

A list of Emergency Contacts is in <u>Appendix C</u>. A Discharge Notification Form, included as <u>Appendix D</u>, will be completed immediately upon detection of a discharge and prior to reporting a spill to the proper authorities. More detailed spill reporting procedures are contained in <u>Section 4.4</u>.

3.3 Potential Discharge Volumes and Direction of Flow

The table below contains expected volume, discharge rate, general direction of flow in the event of equipment failure at the Facility, and means of secondary containment.

Releases from oil-filled construction equipment could range from gradual to instantaneous depending upon the type of leak. Direction of flow will depend on the location of the operational equipment with respect to the Remote Sites.

Table 3-1: Potential Discharge Volumes and Direction of Flow

	O .			
Potential Event	Maximum Volume Released (Gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
Laydown Yard				
Tank Overfill	90	1 gal/min*	TBD	TBD
Hose Leak During Unloading	90	1 gal/min*	TBD	TBD
Dispenser Hose Rupture	90	1 gal/min*	TBD	TBD
Tank Rupture	TBD	Gradual to Instantaneous	TBD	TBD
O&M Facility				

Table 3-1: Potential Discharge Volumes and Direction of Flow

Potential Event	Maximum Volume Released (Gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
Tank Overfill	90	1 gal/min*	TBD	TBD
Hose Leak During Unloading	90	1 gal/min*	TBD	TBD
Dispenser Hose Rupture	90	1 gal/min*	TBD	TBD
Tank Rupture	TBD	Gradual to Instantaneous	TBD	TBD
Drum Rupture	TBD	Gradual to Instantaneous	TBD	TBD
Substation				
Transformer Rupture	TBD	Gradual to Instantaneous	TBD	TBD
Batch Plant				
Tank Overfill	90	1 gal/min*	TBD	TBD
Hose Leak During Unloading	90	1 gal/min*	TBD	TBD
Dispenser Hose Rupture	90	1 gal/min*	TBD	TBD
Tank Rupture	TBD	Gradual to Instantaneous	TBD	TBD
Remote Sites				
Leaking/ Rupturing Gearbox	TBD	Gradual to Instantaneous	Varies	Turbine Enclosure / Sorbent Materials

Maximum Volume Released Maximum **Direction of** Secondary **Potential Event Discharge Rate Flow Containment** (Gallons) Leaking/ **TBD** Gradual to **Varies** Turbine Rupturing Enclosure / Instantaneous Hydraulic Unit Sorbent Materials **TBD** Gradual to **TBD** Leaking/ **Varies** Rupturing Instantaneous Transformer

Table 3-1: Potential Discharge Volumes and Direction of Flow

*Assumes a maximum of 1.5 hours before discovery. In the event of a complete tank rupture, a maximum of 90 gallons could potentially be released before facility response personnel are able to mitigate the discharge. The large spill kits at the Laydown Yard (absorption capacity of XX gallons) as well as the readily-available small spill kits in on-site vehicles (absorption capacity of XX gallons) would be sufficient to clean up an oil spill of this size.

3.4 Containment Drainage

Drainage from the containment areas surrounding tanks, totes, drums, and transformers at the Laydown Yard, Batch Plant, and Substation are controlled by the impervious sides of the tubs and pits. The areas are drained by [General Contractor] by manually activated pumps. The retained rainwater is inspected by [General Contractor] prior to draining to ensure that only oil-free water is discharged. A sorbent filter boom will be used to absorb any oils in the containment area. Drainage events are recorded in the log included in Appendix E.

3.5 Containment and Diversionary Structures

Methods of secondary containment at this Facility include a combination of prefabricated structures and land-based spill response to prevent oil from reaching navigable waters and adjoining shorelines. All secondary containment structures shall be sized to hold a minimum of 110% of the volume of the single largest tank within the containment area. Calculations for the secondary containment capacities are included in Appendix F.

Double-walled Tanks

All ASTs will be double-walled to meet U.S. EPA SPCC secondary containment requirements under 40 CFR Part 112.7(c). Any ASTs with a storage capacity of 660 gallons or more storing Class I, II, or IIIA combustible liquids is required to have vent pipe outlets located twelve (12) feet above ground level under the International Fire Code.

Tubs, Pits, and Lined Containment Berms

The ASTs and other storage containers may be stored within tubs, pits, or lined containment berms at the Laydown Yard and Substation. The bottom and sides are impermeable to restrict the flow of oil outside the containment area. The height of the containment must be a minimum of twelve inches, which provides adequate freeboard for precipitation.

In transfer areas and other parts of the Facility, such as the Remote Sites where a discharge could occur, the following measures shall be implemented:

Drip Pans

During fueling operations outside of the secondary containment structures, drip pans may be utilized to contain small leaks from piping/hose connections. Drip pans may also be utilized during field repair and maintenance of oil-filled construction operational equipment.

Sorbent Material

Spill cleanup kits that include sorbent material, booms, or other portable barriers shall be located near the oil storage area in the Laydown Yard. Portable spill kits shall be located in lube trucks and mechanics trucks. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment in the event of a discharge outside the containment area or at the turbine sites.

3.6 Practicability of Secondary Containment

It has been determined that secondary containment is practicable at this facility at the Laydown Yard, Batch Plant, Substation, and Remote Sites. General secondary containment will be utilized for the slip tanks and mobile refuelers on-site to meet the requirements of 40 CFR § 112.7(c).

3.7 Inspections, Tests, and Records

Visual inspections of oil storage areas will be conducted monthly. Inspections shall include visual observation of the outside of containers for signs of deterioration, discharges, or accumulation of oil inside containment areas. Monthly inspection checklists are provided in <u>Appendix G</u>.

All problems regarding ASTs, piping, containment, or response equipment will be immediately reported to the SPCC Emergency Coordinator listed in <u>Section 1.3</u>. Visible oil leaks from AST walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or discharge to navigable waters or adjoining shorelines. Pooled oil shall be removed immediately upon discovery.

3.7.1 Inspection of ASTs

Inspections of stationary ASTs will be conducted in accordance with the Steel Tank Institute's (STI) "Standard for Inspection of Aboveground Storage Tanks, SP001," 6th Edition, January 2018 (SP001 Standard). The inspections must be conducted by an inspector provided by [General Contractor] who is knowledgeable about storage facility operations, the type of AST and its associated components, the spill control system for the facility, and characteristics of the liquid stored within the AST.

Periodic AST inspections must include the primary tank, supports, anchors, foundations, gauges and alarms, overfill valves, vents, release prevention barriers, and spill control systems, as applicable. The following checklists and records shall be completed to comply with the Periodic AST Inspection Requirements. Checklists are provided in <u>Appendix G</u>.

- The *STI SPoo1 AST Record* shall be completed for each AST as it is installed at the site. The records shall be reviewed and updated when there is a change or alteration to the AST. The AST record must be retained on-site for the life of the AST.
- The STI SP001 Monthly Inspection Checklist shall be completed or updated once each month. The Monthly Inspection Checklists must be retained for at least thirty-six (36) months.
- The STI SPoot Annual Inspection Checklist must be completed once each year. The Annual Inspection Checklists must be retained for at least thirty-six (36) months.

Slip tanks, mobile refuelers, or other tanks located vehicles or being towed are not subject to the SPoo1 Standard for inspections. These containers shall be inspected in accordance with the inspection requirements provided in <u>Section 3.7.2</u>.

3.7.2 Inspection of Non-AST Storage Containers and Oil-Filled Operational Equipment

Visual inspection is considered sufficient for non-AST containers, including drums, totes, and slip tanks, as well as oil-filled operational equipment, including turbines and transformers. The containers and equipment are visually examined on a daily basis (cursory observations) and monthly basis (written inspection) for signs of deterioration or leaks and are immediately replaced if signs of deterioration or leaks are apparent.

Monthly inspections shall be recorded using the checklist in Appendix G and include:

- Observing the exterior of portable containers, such as drums, totes, and slip tanks for signs of deterioration or leaks;
- Observing the fill ports for poor construction that could cause a discharge;
- Observing the exterior of oil-filled operational equipment for signs of deterioration or leaks;
- · Observing secondary containment areas for signs of releases; and
- Checking the inventory of discharge response equipment and restocking as needed.

The oil-filled containers are not equipped with visual gauges or high level alarms. In order to provide equivalent environmental protection, the operator determines the volume of oil in the container prior to transferring oil into the oil-filled containers. Additionally, trained oil-handling personnel are present during loading/unloading activities.

Fire extinguishers will be visually inspected monthly and certified annually. Level gauge accuracy will be verified by a comparison to a stick test at least annually.

3.8 Personnel, Training, and Discharge Prevention Procedures

The SPCC Emergency Coordinator will be the facility designee and will be responsible for oil discharge prevention, control, and response preparedness activities at this facility. [General Contractor] management will instruct oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new Facility personnel with oil-handling responsibilities shall be provided with this same training prior to being involved in any oil operation associated with the Project. The site spill clean-up contractor designated by [General Contractor] is [Spill Contractor]. In the event of a larger spill (defined as one that cannot be safely controlled or cleaned up by facility personnel), [General Contractor] will contact the designated site spill clean-up contractor and/or 911 to provide emergency response services.

Annual discharge prevention briefings shall be held by the SPCC Emergency Coordinator for all Facility personnel involved in oil operations. The briefings are aimed at ensuring adequate understanding of the SPCC Plan. The briefing will highlight and describe known discharge events or failures, malfunctioning components, and any recently developed precautionary measures.

Records of the briefing and discharge prevention training shall be kept on the form contained in Appendix H and maintained with this SPCC Plan for a period of three (3) years from the briefing/training date.

3.9 Security

Fencing is generally not provided at the Facility. Instead, environmental equivalent protection is being provided by the temporary nature of the construction, the remote locations, full-time Facility personnel at the Laydown Yard [days and hours of operation], security guards, and locked storage tanks at night. Pole lighting will be installed around the Laydown Yard. Security will be present whenever the Contractor is not present on site (normally nights on weekdays and twenty-four (24) hours on the weekends).

Drain valves shall be locked in the closed position to prevent unauthorized opening at all times. Fill caps on the tanks are locked at all times when not in operation. The fuel dispenser is chained and locked at night so that it cannot be removed when the Facility is not attended. With the dispenser locked in place, the fuel dispensing pump shall be turned off.

3.10 Loading/Unloading

There is no dedicated loading/unloading rack at the Facility during the construction phase of the Project. Tank truck loading/unloading procedures conform to regulations established by the U.S. Department of Transportation. *[General Contractor]* will ensure that vendors understand the site layout, that they know the protocols for unloading oil products, and that they have the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose. This applies to loading/unloading at both the Laydown Yard and Remote Sites.

Vehicle filling and unloading operations at the Laydown Yard, Batch Plant, Substation, and Remote Sites shall be performed by Facility personnel trained in proper discharge prevention procedures. The truck driver or Facility personnel shall stay with and monitor the vehicle at all times while fuel is being transferred. Transfer operations shall be performed according to the procedures listed in the table below.

Table 3-2: Fuel Transfer Procedures

Prior to Loading/Unloading		
	Visually check hoses for leaks and wet spots.	
	Verify the sufficient volume is available in the storage tank or truck.	
	Lock, in the closed position, all drainage valves of the secondary containment structure.	
	Secure the tank vehicle/set parking brakes.	
	Verify proper alignment of valves and proper functioning of the pumping system.	
	If filling a tank truck, inspect the lowest drain and all outlets.	

Table 3-2: Fuel Transfer Procedures

Establish adequate bonding/grounding prior to connecting to the bulk fuel transfer point.
Turn off cell phone.
No smoking.

During Loading/Unloading		
	Driver must stay with the vehicle at all times during loading/unloading.	
	Periodically inspect all systems, hoses, and connections.	
	When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves.	
	When making a connection, shut off the vehicle engine. When transferring flammable liquid, shut off the engine unless it is used to operate a pump.	
	Maintain communication with the pumping and receiving stations.	
	Monitor the liquid level in the receiving tank to prevent overflow.	
	Watch for any leaks or spills. Any small leaks or spills should be immediately stopped and then absorbed and disposed of properly.	

After Loading/Unloading		
	Make sure the transfer operation is complete.	
	Close all tank and loading valves before disconnecting.	
	Secure all hatches.	
	Disconnect all grounding/bonding wires from the bulk fuel transfer point.	
	Make sure the hoses are drained to remove remaining oil before moving them away from the connection. Use a drip pan.	
	Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.	
	Inspect the lowest drain and other outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.	

Inspect the loading/unloading point and tank to verify that no leaks have occurred or that any leaked or spilled material has been cleaned up and disposed of properly.

3.11 Brittle Fracture Evaluation

There are no field constructed tanks at the Facility.

3.12 Conformance with State and Local Applicable Requirements

Each responsible Owner or Operator at the Facility is required to get all necessary tanks approved, registered, and permitted with applicable Federal, State, and Local Agencies, including the New York Department of Environmental Conservation (NY DEC).

Each responsible Owner or Operator at the Facility is required to immediately notify the NY DEC Hotline (1-800-457-7362 in state or 518-457-7362 out of state) in the event of all spills unless the spill meets **all** of the following criteria:

- 1. The quantity is known to be less than 5 gallons;
- 2. The spill is contained and under control of the spiller;
- 3. The spill has not and will not reach the State's water or any land; and
- 4. The spill is cleaned up within 2 hours of discovery.

Please note that spills to dirt, gravel, or other pervious surfaces are considered spills to land. Spills that are relegated to impervious surfaces, such as concrete or asphalt, would not be considered to have impacted land. For spills not deemed reportable, it is strongly recommended that the facts concerning the incident be documented by the spiller and a record be maintained for one year.

Diesel exhaust fluid, herbicides, and other non-petroleum chemicals are not included in this SPCC Plan as they are not oil-based products and are therefore not subject to SPCC regulations. Potential spills from these containers will be subject to the New York DEC spill reporting requirements listed above and in <u>Section 4.4</u>.

Refer to Section 4.4 for Discharge Notification requirements.

4.0 DISCHARGE RESPONSE

The steps and information below outline how to respond and implement cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and/or federal laws. Immediate action must be taken to control, contain, and recover discharged product. In general, the following steps shall be taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down the source of discharge to stop the flow;
- Contain the discharge with containers, sorbents, berms, trenches, sandbags, or other material;
- Contact the SPCC Emergency Coordinator or his/her alternate;
- Collect and dispose of recovered products according to regulation;
- Contact regulatory authorities and the response organization and report the release; and
- Ensure refuse materials are hauled off by a permitted hauler to a permitted facility.

For purposes of establishing appropriate response procedures, this SPCC Plan classifies discharges as either "minor" or "major", depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in <u>Appendix C</u>. This list identifies personnel to be contacted in case of emergency and shall be posted on the information board in the Laydown Yard.

4.1 Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small;
- Discharged material is easily stopped and controlled at the time of discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water, groundwater, or field drains;
- There is little risk to human health and safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned by Facility personnel. The following procedures apply:

- Immediately notify the SPCC Emergency Coordinator;
- Under direction of the SPCC Emergency Coordinator, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers; and
- The SPCC Emergency Coordinator will complete the discharge notification form in Appendix D and attach a copy to this SPCC Plan.

4.2 Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by Facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters water, groundwater, or sewer drains;
- The discharge requires special equipment or training to clean up;
- The discharge material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- Safety of personnel is the primary concern. No countermeasures that risk the health or safety of personnel should be undertaken;
- If the SPCC Emergency Coordinator is not present at the Facility, the senior on-site
 person shall notify the SPCC Emergency Coordinator of the discharge and has the
 authority to initiate notification and response;
- No smoking, open flames, cell phones, or other spark-inducing equipment is permitted in the area of a flammable material spill;
- Facility personnel should stop the source of the leak or spill if possible by closing a
 valve, turning off a pump, sealing a hole, etc. Facility personnel should take the following
 actions to contain the spill: use absorbent pads, booms, sand, and/or speedi-dri
 materials to stop the spread of the spill. Contaminated soil should be placed on an
 impermeable liner for containment;
- Emergency medical treatment and first aid shall be administered by personnel certified in first aid/CPR. The SPCC Emergency Coordinator (or senior on-site person) must call for medical assistance if workers are injured;
- Establish fire prevention measures in the vicinity of the spill. Divert traffic (vehicular and pedestrian) from the area. The SPCC Emergency Coordinator (or senior on-site person) must call the local Fire Department or Police Department;
- If Facility personnel are unsure of the hazards involved, the amount of the spill is too large, or a release to navigable waters or adjoining shorelines is threatened, the SPCC Emergency Coordinator (or senior on-site person) shall call for outside assistance from a spill response/cleanup contractor;
- The SPCC Emergency Coordinator (or senior on-site person) will immediately (within fifteen (15) minutes) call the National Response Center (800-424-8802) and the NY DEC Hotline (1-800-457-7362);
- The SPCC Emergency Coordinator (or senior on-site person) will complete the discharge notification form in <u>Appendix D</u> and attach a copy to this SPCC Plan; and
- The SPCC Emergency Coordinator (or senior on-site person) will coordinate cleanup and contract a cleanup contractor as necessary.

If the SPCC Emergency Coordinator is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

4.3 Waste Disposal

Waste resulting from a minor discharge response will be contained in impervious bags, drums, or buckets. The SPCC Emergency Coordinator will characterize the waste for proper disposal and ensure it is removed from the Facility by a licensed waste hauler. All containers used to store contaminated materials must sealed and properly labeled to list the contents, date, name of responsible party (who spilled the materials), and phone number for the responsible party.

Wastes resulting from a major discharge response will be removed and disposed of by a licensed cleanup contractor. Waste materials will be disposed of in accordance with federal, state, and local regulations.

[General Contractor] has contracted with [Spill Contractor] ([Spill Contractor Phone]) in the event that hazardous material needs to be removed from the site. Prior to commencement of any contaminated soil extraction, <u>811 must be contacted before digging begins</u>.

4.4 Discharge Notification

The individual identifying the release shall immediately contact the facility SPCC Emergency Coordinator. The SPCC Emergency Coordinator or designee will be responsible for notifying the appropriate regulatory agencies and, if necessary, the spill clean-up contractor. Any size discharge that affects or threatens to affect navigable waters (i.e. one that creates an oil film, sheen, emulsion, or sludge upon navigable waters or adjoining shorelines) must be reported immediately (within fifteen (15) minutes) to the National Response Center (800-424-8802). The National Response Center is staffed twenty-four (24) hours a day.

Upon discovery of a spill, the SPCC Emergency coordinator is required to immediately notify the NY DEC Hotline (1-800-457-7362 in state or 518-457-7362 out of state) **unless** the spill meets <u>all</u> of the following criteria:

- 1. The quantity is known to be less than 5 gallons;
- 2. The spill is contained and under control of the spiller;
- 3. The spill has not and will not reach the State's water or any land; and
- 4. The spill is cleaned up within 2 hours of discovery.

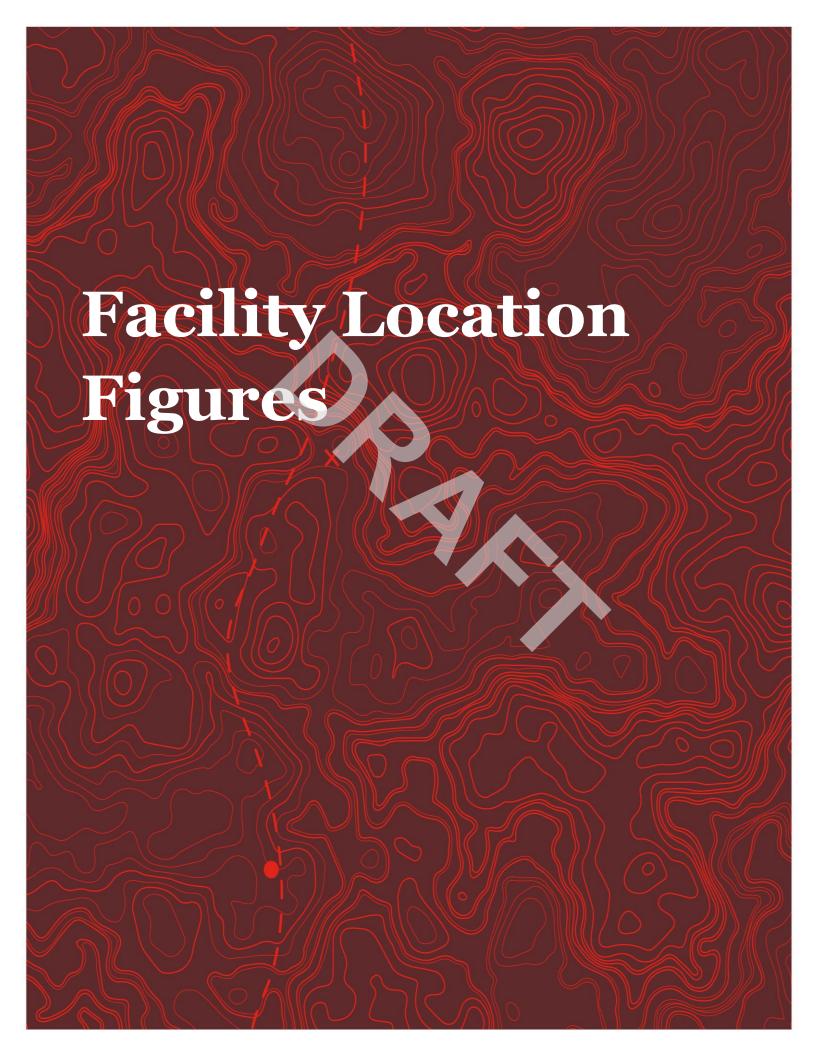
Please note that spills to dirt, gravel, or other pervious surfaces are considered spills to land. Spills that are relegated to impervious surfaces, such as concrete or asphalt, would not be considered to have impacted land. For spills not deemed reportable, it is strongly recommended that the facts concerning the incident be documented by the spiller and a record be maintained for one year.

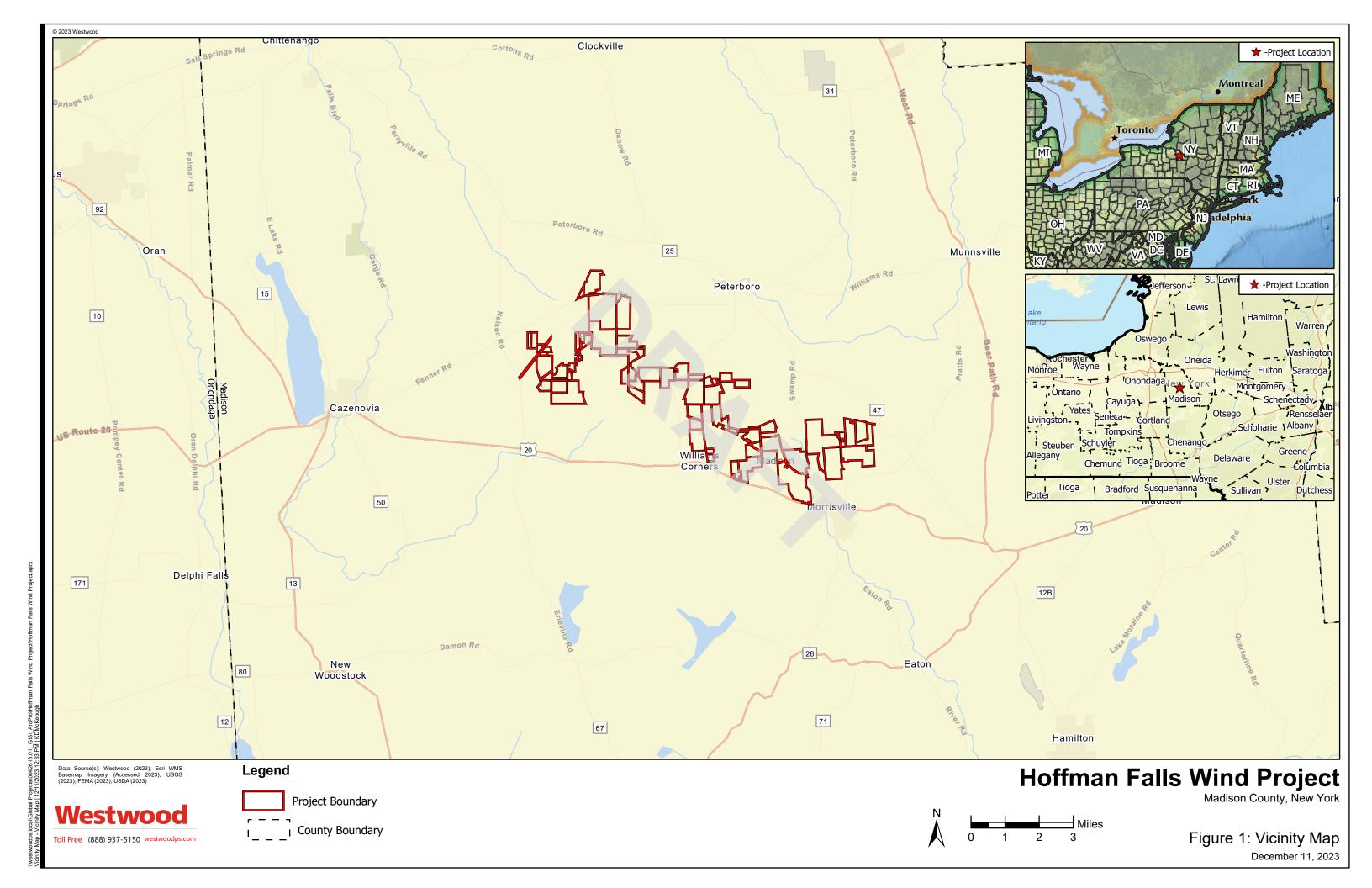
In addition, 40 CFR 112.4 requires that information be submitted to the U. S. EPA Regional Administrator for Region 2 (212-637-4040) and the appropriate state agency in charge of oil pollution control activities, in this case, the NY DEC Spill Hotline (1-800-457-7362), whenever the Facility discharges more than 1,000 gallons of oil to a navigable water in a single event or discharges more than forty-two (42) gallons of oil to navigable waters in each of two (2) discharge incidents within a twelve (12) month period.

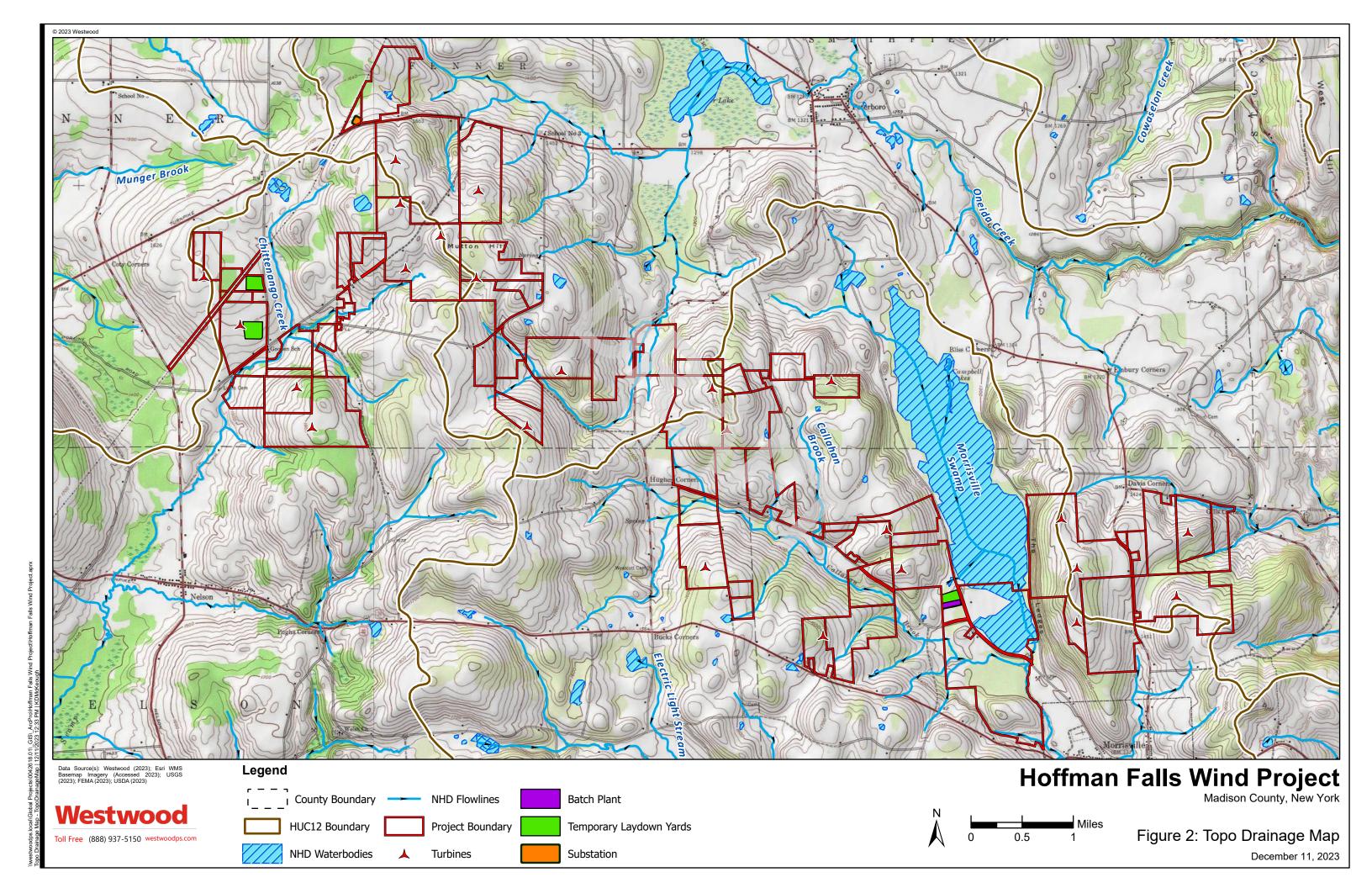
Contact information for reporting the discharge to the appropriate authorities is listed in <u>Appendix C</u> and is also posted at the information board in the Laydown Yard.

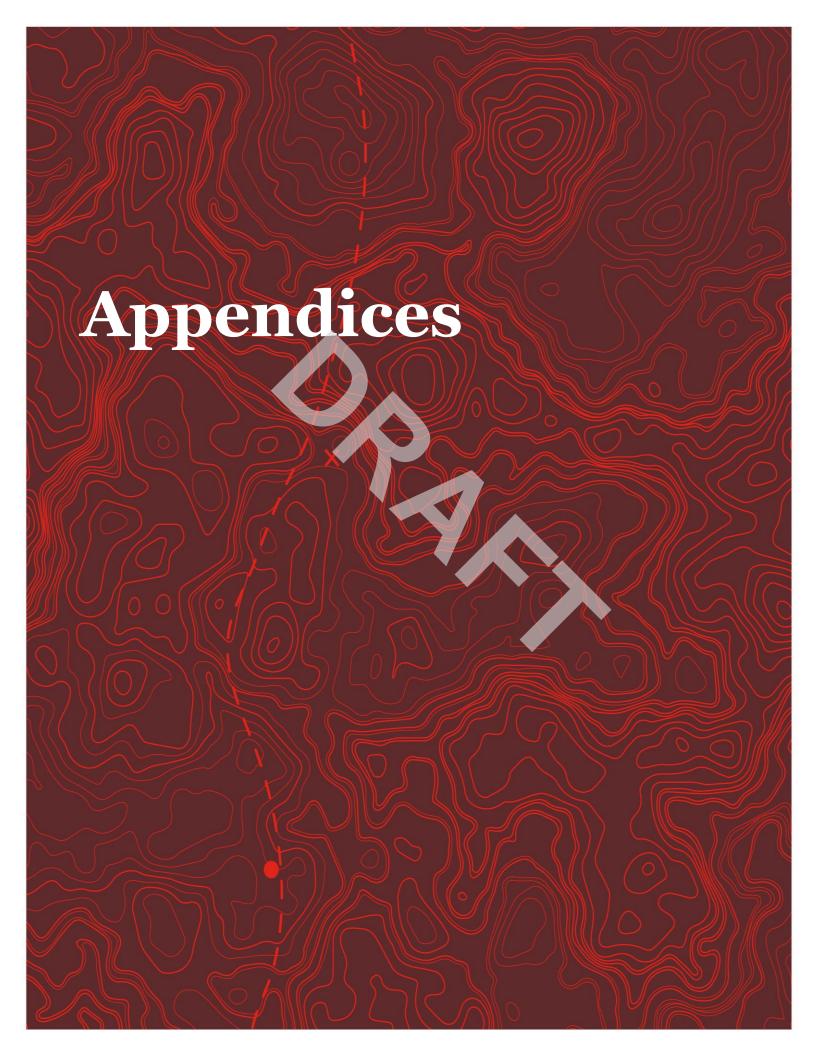
A summary sheet is included in <u>Appendix D</u> to facilitate the reporting. The person reporting the discharge will provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Source and cause of the release or discharge;
- Type of material(s) released or discharged;
- · Quantity of materials released or discharged;
- Danger or threat posed by the release or discharge;
- Number and type of injuries, if any;
- Media affected or threatened by the discharge (i.e. water, land, or air);
- Action used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation is needed:
- Names of individuals and/or organizations who have been contacted;
- Weather conditions at the incident location; and
- · Any other information that may help emergency personnel respond to the incident.









APPENDIX A: SUBSTANTIAL HARM DETERMINATION

Facility Name: Hoffman Falls Wind Project

Facility Address: [Site Address], [Site City], NY [Site Zip Code]

Substantial Harm Determination

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?	No
Does the Facility have a total 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 within any aboveground oil storage tank area?	No
Does the Facility have a total 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 40 CFR Part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the Facility could cause injury to fish and wildlife and sensitive environments?	No
Does the Facility have a total 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 40 CFR Part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the Facility would shut down a public drinking water intake?	No
Does the Facility have a total oil storage capacity greater than or equal to one 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 five years?	No

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 & Date	
Printed Name	
Company and Title	

APPENDIX B: PLAN REVIEW LOG

Five (5) Year Review Log (not anticipated to be needed)

I have completed a review and evaluation of the SPCC Plan for this Facility and will/will not amend this SPCC Plan as a result.

Five (5) Year Review Log	(not anticipated	l to be needed)
--------------------------	------------------	-----------------

Review Date	SPCC Plan Amendment	Name and Signature of Person Authorized to Review This SPCC Plan

Technical Amendment Log

Any technical amendments to this SPCC Plan will be re-certified by a licensed Professional Engineer.

Technical Amendment Log

Review Date	Description of Technical Amendment	Name and Signature of Person Certifying This Technical Amendment

APPENDIX C: EMERGENCY CONTACTS

EMERGENCY CONTACTS

Person responsible for spill prevention: [General Contractor Representative], [General Contractor] [General Contractor Representative Title]

EMERGENCY TELEPHONE NUMBERS

Facility:	
[General Contractor Representative], [General Contractor] [General Contractor Representative Title]	[General Contractor Representative Phone] [General Contractor Address]
[Alternate Representative], [General Contractor] [Alternate Representative Title]	[Alternate Representative Phone] [General Contractor Address]
Andy MacCallum, Hoffman Falls Wind LLC President, Liberty Renewables Inc	1-902-877-5622 90 State Street, Albany, NY 12207
Designated Spill Contractor:	
[Spill Contractor]	[Spill Contractor Phone] [Spill Contractor Address]
Local Emergency Response:	
Madison County 911	911
Madison County Sheriff	315-366-2318 138 North Court Street #7, Wampsville, NY 13163
Morrisville Fire Station	315-684-3214 50 Main Street, Morrisville, NY 13408
Notification:	
National Response Center	800-424-8802
NY DEC Reporting Hotline	1-800-457-7362
U.S. EPA, Region 2	212-637-4040 Ted Weiss Federal Building, 290 Broadway, New York, NY 10007

APPENDIX D: DISCHARGE NOTIFICATION FORM

Discharge Notification Form

In the event of a discharge to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center. See also the notification information provided in <u>Section 4.4</u> of the SPCC Plan.

Discharge Information

Facility Name:	Hoffman Falls Wind Project
Address:	[Site Address] [Site City], NY [Site Zip Code]
Telephone:	[Site Phone]
Operator:	[General Contractor]
Primary Contact:	[General Contractor Representative], [General Contractor Representative Title] [General Contractor Representative Phone]
Discharge Date:	Discharge Time:
Weather Conditions and Temperature:	
Name of reporting individual:	
Type of material:	
Quantity released:	
Estimated quantity released to navigable waters:	
Cause of discharge:	
Action taken to stop, remove, and mitigate the effects of the discharge:	
Media affected:	
Source and cause of discharge:	
Evacuation needed?	
Danger posed by release/discharge:	
Additional information:	

Damages or Injuries

Organizations and Individuals Contacted

Fire/Police/Ambulance	911	Time:
Morrisville Fire Station	315-684-3214	Time:
National Response Center	800-424-8802	Time:
NY DEC Reporting Hotline	1-800-457-7362	Time:
U.S. EPA, Region 2	212-637-4040	Time:

Signature

Signature	
Printed Name	
Company & Title	

APPENDIX E: RECORD OF SECONDARY CONTAINMENT DRAINAGE

This record will be completed when rainwater from secondary containment is drained from or pumped out of secondary containment. The bypass valve will normally be sealed in a closed position. It will be opened and resealed following drainage under responsible supervision.

Rainwater is not to be drained if oil or an oil sheen is present.

Date	Time	Area Drained	Presence of Oil (Y/N)	Signature

APPENDIX F: CALCULATION OF SECONDARY CONTAINMENT

All secondary containment shall be sized to accommodate a minimum of 110% of the volume of the single largest container within each individual containment area. Secondary containment shall be in place prior to placing any tanks into service. Specific secondary containment capacities will be measured and included in Appendix F upon completion of the site inspection.

Location	Secondary Containment Type	Secondary Containment Capacity	Largest Container Volume	110% of Largest Container	Sufficient? (Y/N)

APPENDIX G: MONTHLY FACILITY INSPECTION

The following checklist is to be used for monthly inspections. Completed checklists must be signed by the inspector and maintained at the Facility, with the SPCC Plan, for at least three (3) years. Any item that receives a "yes" answer must be described and addressed immediately.

Inspection Item	Y	N	Description and Comments
Storage Tanks			
Tank surfaces show signs of leakage			
Tanks are damaged, rusted, or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Level gauges are inoperable			
Vents are obstructed			
Containment Areas			
Secondary containment is damaged or stained			
Standing water in containment			
Drainage valve is open or not secure			
Evidence of oil release from tank			
Transformers			
Transformer surfaces show signs of leakage			
Transformer is damaged, rusted, or deteriorated			
Bolts, rivets, or seams are damaged			
Transformer supports are deteriorated or buckled			
Transformer foundations have eroded or settled			
Safety			
Safety equipment missing or inoperable			
Spill response equipment used and not replaced			

Inspection Item	Y	N	Description and Comments
Fire extinguisher not present/operational			
Fuel tank not grounded			
Signature:			
Date:			



STI SP001 AST Record

Form completed by (Name)					Date	
(Title)						
OWNER INFORMATION		FACILITY IN	IFORMATION		INSTALLER INFORMATION	ION
Name		Name			Name	
Number and Street		Number and Street			Number and Street	
City, State, Zip Code		City, State, Zip Code			City, State, Zip Code	
		Regulatory facility ID number	(if applicable)			
OWNER'S TANK ID		OTHER ID			INITIAL SERVICE DATE	
Manufacturer:	Contents:	Constru	uction Date:		Last Repair/Reconstruction Date:	
Dimensions:	Capacity:	Last Ch	nange of Product	Date:		
Design: UL	☐ SwRI _	API		_ Dother	☐ Unknown	
☐ Horizontal	☐ Vertica	I ☐ Rec	tangular			
Construction:	☐ Cathodically	Protected (Check one: A.	Salvanic or B.	Impressed Cui	rrent) Date Installed:	
☐ Coated Steel	☐ Concrete end	cased steel	el 🗌 Other			
☐ Double-Bottom	☐ Double-Wall	☐ Lined inside; Date	lining installed: _			
Spill control:	e Concrete		CRDM: ☐ yes	□ no		
☐ None ☐ Other			If yes, type: □	Release Prev	vention Barrier 🗌 Elevated tank 🛮 Doub	le bottom tank
Tank elevated on supports ☐ yes ☐				Double wall to	ank CE-AST other	_
Support material: steel concrete	other					
Release Prevention Barrier: yes no	If yes, Date In	stalled:	AST Category:	☐ Category	1	
If ves Type: ☐ concrete ☐ synthetic liner	□ clay liner □	steel other				

AST Record Page 1 of 2

OWNER'S TANK ID	OTHER ID		INITIAL SERVICE DATE
Manufacturer: Contents:	Constru	uction Date:	Last Repair/Reconstruction Date:
Dimensions: Capacity:	Last Ch	nange of Product Date:	
Design: UL SwRI	API		Unknown
☐ Horizontal ☐ Vertice	al 🔲 Rec	tangular	
Construction: Bare Steel Cathodically	Protected (Check one: A. G	Salvanic or B. Impressed Cur	rent) Date Installed:
☐ Coated Steel ☐ Concrete en	cased steel	el Dther	
☐ Double-Bottom ☐ Double-Wall	☐ Lined inside; Date	lining installed:	
Chill control.		CDDM: Cluss Clus	
Spill control:		CRDM: yes no	ention Possion Florested took Double bettern took
None Other			ention Barrier Elevated tank Double bottom tank
Tank elevated on supports yes no		☐ Double wall ta	nk CE-AST other
Support material: steel concrete other			_
Release Prevention Barrier: yes no If yes, Date II		AST Category:	☐ Category 2 ☐ Category 3
If yes, Type: ☐ concrete ☐ synthetic liner ☐ clay liner ☐	steel		
OWNER'S TANK ID	OTHER ID		INITIAL SERVICE DATE
OWNER'S TANK ID Manufacturer: Contents:	OTHER ID	uction Date:	INITIAL SERVICE DATE Last Repair/Reconstruction Date:
Manufacturer: Contents:	Constru	uction Date:	
Manufacturer: Contents: Dimensions: Capacity:	Constru Last Ch	nange of Product Date:	Last Repair/Reconstruction Date:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI	Constru Last Ch	nange of Product Date:	Last Repair/Reconstruction Date:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertical	Constru Last Ch API Rec	nange of Product Date:	Last Repair/Reconstruction Date:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertice Construction: Bare Steel Cathodically	Constru Last Ch API AI Protected (Check one: A. G	nange of Product Date:	Last Repair/Reconstruction Date: Unknown rent) Date Installed:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertical Construction: Bare Steel Cathodically Concrete en	Constru Last Ch API AI Protected (Check one: A. Cased steel Stainless steel	nange of Product Date:	Last Repair/Reconstruction Date: Unknown rent) Date Installed:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertice Construction: Bare Steel Cathodically	Constru Last Ch API al Rec Protected (Check one: A. Cased steel Stainless steel	nange of Product Date:	Last Repair/Reconstruction Date: Unknown rent) Date Installed:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertical Construction: Bare Steel Cathodically Concrete en	Constru Last Ch API al Rec Protected (Check one: A. Cased steel Stainless steel	nange of Product Date:	Last Repair/Reconstruction Date: Unknown rent) Date Installed:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertice Construction: Bare Steel Cathodically Coated Steel Concrete en Double-Bottom Double-Wall	Constru Last Ch API al Rec Protected (Check one: A. Cased steel Stainless steel Lined inside; Date	nange of Product Date: Other tangular calvanic or B. Impressed Cur el Other lining installed: CRDM: yes no	Last Repair/Reconstruction Date: Unknown rent) Date Installed:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertical Construction: Bare Steel Cathodically Coated Steel Concrete en Double-Bottom Double-Wall Spill control: Earthen Dike Steel Dike Concrete	Constru Last Ch API al Rec Protected (Check one: A. Cased steel Stainless steel Lined inside; Date	nange of Product Date: Other tangular calvanic or B. Impressed Cur el Other lining installed: CRDM: yes no If yes, type: Release Prev	Last Repair/Reconstruction Date: Unknown rent) Date Installed:
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertica Construction: Bare Steel Cathodically Coated Steel Concrete en Double-Bottom Double-Wall Spill control: Earthen Dike Steel Dike Concrete None Other	Constru Last Ch API al Rec Protected (Check one: A. Ge) cased steel Stainless stee Lined inside; Date	nange of Product Date: Other tangular calvanic or B. Impressed Cur el Other lining installed: CRDM: yes no If yes, type: Release Prev	Last Repair/Reconstruction Date: Unknown Tent) Date Installed: ention Barrier Elevated tank Double bottom tank
Manufacturer: Contents: Dimensions: Capacity: Design: UL SwRI Horizontal Vertical Construction: Bare Steel Cathodically Coated Steel Concrete en Double-Bottom Double-Wall Spill control: Earthen Dike Steel Dike Concrete None Other Tank elevated on supports yes no	Constru Last Ch API al Rec Protected (Check one: A. Ge) cased steel Stainless stee Lined inside; Date	nange of Product Date: Other tangular salvanic or B. Impressed Cur el Other lining installed: CRDM: yes no If yes, type: Release Prev Double wall ta	Last Repair/Reconstruction Date: Unknown Tent) Date Installed: ention Barrier Elevated tank Double bottom tank

AST Record Page 2 of 2

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date:	Prior Inspection Date:	Retain until date:
Inspector Name (print):		Title:
Inspector's Signature		
Tank(s) inspected ID		
Regulatory facility name and ID number (if applicable	le)	

Inspection Guidance:

- > This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable). Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- > For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- > The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- > Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- > Retain the completed checklists for at least 36 months.
- After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank and Pi		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? Note: If "No", identify tank and describe leak and actions taken.	□ Yes □ No	
2	Is the tank liquid level gauge legible and in good working condition?	□ Yes □ No □ N/A	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□ Yes □ No	

4	Is the primary tank free of water or has another preventative measure been taken? NOTE: Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.	□ Yes □ No □ N/A	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□ Yes □ No □ N/A	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□ Yes □ No □ N/A	
	Equipment o	n tank	
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□ Yes □ No □ N/A	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	□ Yes □ No □ N/A	
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□ Yes □ No □ N/A	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? Note: If "No", identify location and describe leak.	□ Yes □ No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□ Yes □ No □ N/A	
	Containment (Diking	/Impounding)	
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□ Yes □ No □ N/A	
13	Are dike drain valves closed and in good working condition?	□ Yes □ No □ N/A	
14	Are containment egress pathways clear and any gates/doors operable?	□ Yes □ No □ N/A	
	Concrete Exterior A	AST (CE-AST)	
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□ Yes □ No □ N/A	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□ Yes □ No □ N/A	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□ Yes □ No □ N/A	
	Other Condit	tions	
18	Is the system free of any other conditions that need to be addressed for continued safe operation?	□ Yes □ No	

Additional Comments:	
	A

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date:	Prior Inspection Date:	Retain until date:
Inspector Name (print):		Title:
Inspector's Signature: Tank(s) inspected ID Regulatory facility name and ID number (if applicable)		

Inspection Guidance:

- > This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- > For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- > The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- > Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- > In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- > Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- > Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- > Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

ITEM		STATUS	COMMENTS / DATE CORRECTED
Tank Foundation/Supports			upports
1	Free of tank settlement or foundation washout?	□Yes □No	
2	Concrete pad or ring wall free of cracking and spalling?	□Yes □No □N/A	

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3	Tank supports in satisfactory condition?	□Yes □No □N/A	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	□Yes □No □N/A	
5	Is the grounding strap between the tank and foundation/supports in good condition?	□Yes □No □N/A	
		Tank Shell, Heads ar	nd Roof
6	Free of visible signs of coating failure?	□Yes □No	
7	Free of noticeable distortions, buckling, denting, or bulging?	□Yes □No	
8	Free of standing water on roof?	□Yes □No □N/A	
9	Are all labels and tags intact and legible?	□Yes □No	
		Tank Manways, Piping, ar	nd Equipment
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	□Yes □No □N/A	
		Tank Equipmen	at .
11	Normal and emergency vents free of obstructions?	□Yes □No	
12	Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?	□Yes □No □N/A	
13	Are flame arrestors free of corrosion and are air passages free of blockage?	□Yes □No □N/A	
14	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manways).	□Yes □No □N/A	
15	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?"	□Yes □No □N/A	

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16	Are all valves free of leaks, corrosion and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable): Anti-siphon valve	□Yes □No	□ N/A	
17	Are strainers and filters clean and in good condition?	□Yes □No	□N/A	
		Ins	sulated Tan	ks
18	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	□Yes □No	□N/A	
19	Insulation free of noticeable areas of moisture?	□Yes □No	□N/A	
20	Insulation free of mold?	□Yes □No	□N/A	
21	Free of visible signs of coating failure?	□Yes □No	□N/A	
		Tank / Pipir	ng Release	Detection
22	Is inventory control being performed and documented if required?	□Yes □No	□N/A	
23	Is release detection being performed and documented if required?	□Yes □No	□N/A	
		Oth	er Equipme	nt
24	Are electrical wiring and boxes in good condition?	□Yes □No	□N/A	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	□Yes □No	□N/A	

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Additional Comments:	

STI SP001 Portable Container Monthly Inspection Checklist

General Inspection Information:

Inspection Date:	Prior Inspection Date:	Retain until date:
Inspector Name (print):		Title:
Inspector's Signature (): Container(s) inspected ID Regulatory facility name and ID number (if applicable)		

Inspection Guidance:

- > This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- This periodic Inspection is intended for monitoring the external condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. Note the non-conformance and corresponding corrective action in the comment section.
- > Retain the completed checklists for at least 36 months.

	Item			Area:		Area:		Area:	
		Portable	e Container Co	ntainment/Sto	rage Area			1	
1	Are all portable container(s) within designated storage area?	□Yes	□No	□Yes	□No	□Yes	□No	□Yes	□No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes	□No	□Yes	□No	□Yes	□No	□Yes	□No
3	Are drain valves closed and in good working condition?	□Yes	□ No □N/A	□Yes □	No □N/A	□Yes □	No □N/A	□Yes	□ No □N/A
4	Are containment egress pathways clear and any gates/doors operable?	□Yes	□ No □N/A	□Yes □	No □N/A	□Yes □	No □N/A	□Yes	□ No □N/A
			Cont	ainer					
5	Is the container free of leaks? Note: If "No", identify container and describe leak.	□Yes	□No	□Yes	□No	□Yes	□No	□Yes	□No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes	□No	□Yes	□No	□Yes	□No	□Yes	□No

Comments:	

APPENDIX H: DISCHARGE PREVENTION BRIEFING AND TRAINING LOG

Annual discharge prevention briefings will be held to ensure adequate understanding of the SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components and any recently developed precautionary measures. Oil-handling personnel shall be trained in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of the SPCC Plan.

Project Name:	
Project Location:	
Instructor's Name(s):	
Instructor's Title(s):	
Course Location:	
Date of Course:	
Course Length (hours):	

Specific Training Objectives:

Attendee Roster (attach additional pages as necessary)

No.	Name of Attendee	Company