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April 12, 2017

Via Electronic Filing

Ms. Barcy McNeal
Public Utilities Commission of Ohio
Administration/Docketing
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793

Re: Hog Creek Wind Farm LLC,
Case Nos. 10-654-EL-BGN, 16-1422-EL-BGA and 16-1423-EL-BGA

Dear Ms. McNeal:

On November 29, 2016, the OPSB issued an Order on Certificate approving Hog Creek Wind Farm, LLC's ("Hog Creek") applications to amend its Hog Creek I Certificate (Case No. 09-277-EL-BGN) and Hog Creek II Certificate (Case No. 10-654-EL-BGN) subject to the conditions set forth in the Stipulation and continued compliance with the conditions set forth in the certificate orders as later amended (Order on Certificate at 9).

Within these sets of conditions, Hog Creek II Certificate **Condition No. 18** requires that:

At least seven days before the preconstruction conference, Hog Creek shall submit to staff a copy of all NPDES permits including its approved Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention, Control and Countermeasure procedures, and its erosion and sediment control plan. Any soil issues must be addressed through proper design and adherence to the OEPA BMPs related to erosion and sedimentation control.

In compliance with Condition No. 18, attached is a copy of the Spill Prevention, Control, and Countermeasure Plan. If you have any questions please call at the number listed above.

Sincerely,

Sally W Bloomfield

Sally W. Bloomfield

Attachment

cc: Andrew Conway (w/Attachment)
Jonathan Pawley (w/Attachment)

SPCC
Hog Creek Wind Project, LLC
Spill Prevention, Control, and Countermeasure Plan

Project # 23049

Ref No:

Issue No: 02

Revision History

Issue	Date	Nature And Location Of Change
01	01/14/2016	Document first created
02	04/11/2017	Minor edits

CONTENTS

1.0 PURPOSE

The Spill Prevention, Control, and Countermeasure (SPCC) Plan was prepared to satisfy the applicable requirements under 40 CFR Part 112 and to prevent the spill/discharge of oil products (petroleum, vegetable, animal fat, etc.) into navigable waters (streams, creeks, rivers and lakes) of the United States. The SPCC Plan also addresses the spill response procedures and actions that must be implemented if a spill does occur at the RES Americas Construction site.

2.0 SCOPE

Unless specifically noted herein, this procedure shall apply to all Work conducted by/for Renewable Energy Systems Americas Inc. and any of its affiliate or subsidiary companies hereafter referred to in this procedure as the "RES Americas" This SPCC Plan is valid for operations performed and managed at the Hog Creek Wind Project.

3.0 REFERENCE DOCUMENTS

3.1 RES-A EMS Manual - http://resaecm/livelink/llisapi.dll/properties/6774899

3.2 RES-A Site specific –Hog Creek CEP – (Construction Environmental Plan) http://resaecm/livelink/llisapi.dll/properties/22887072

3.3 CFR 1910 Subpart Z

3.4 CFR Title 40

3.5 Ohio Environmental Protection Agency (OHEPA) spill reporting protocol - ***OHEPA*** http://epa.ohio.gov/Portals/27/serc/SERC_ReleaseReporting.pdf

3.6 40 CFR – The Environmental Protection Agency Code of Federal Regulations (CFR) Title 40.

3.7 Company – RES Americas, or RES.

3.8 Contractor – Person or persons, firm or company, including its employees and agents or Contractors, to who the Company has awarded a contract, which requires work to be carried out on the Company's premises or sites.

3.9 EL – Environmental Lead (Also-Environmental Supervisor).

3.10 EPA – Environmental Protection Agency.

3.11 PM – Project Managerers to the RES Americas managed Construction site.

3.12 RES HSQE – RES Health Safety Quality and Environment Department.

3.13 SPCC – Spill Prevention, Control, and Countermeasure Plan.

3.14 SWPPP – Storm Water Pollution Prevention Plan.

3.15 Transporter – Any Contractor approved to transfer waste to an approved disposal point.

3.16 TSDF – Treatment, storage and disposal facility.

3.17 LOTO – "Lock Out Tag Out" a method of safely removing equipment from service for maintenance.

4.0 RESPONSIBILITIES

4.1 Discharge Prevention and Reporting

4.1.1 **Contractor Site Supervisor** – Identify the location and contents of each applicable oil storage container.

4.1.2 **Contractor Site Supervisor** – Maintain a written copy of the SPCC Plan onsite.

4.1.3 **Contractor Site Supervisor, RES Americas Project Manager, and the RES Americas Environmental Supervisor** – If an oil spill/release occurs at the site, immediately implement the Spill Response, Cleanup, and Reporting Procedure in Appendix 4.

4.1.4 **Contractor Site Supervisor or Designee** – Perform and document monthly visual inspections of oil handling and storage areas, pad-mount transformers, turbines, bulk storage containers, secondary containment, piping, valves and transfer systems,temporary fueling stations, storm water features, security measures and other items – See Appendix 3.

4.1.5 **Contractor Site Supervisor or Designee** – Conduct and document periodic testing of company owned above ground storage tanks at least every 10 years.

4.1.6 **Contractor Site Supervisor or Designee** – Inspect and document storm water discharged from diked areas.

4.1.7 **Contractor Site Supervisor or Designee** – Apply labelling and signage requirements for containers and above ground storage tanks.

4.1.8 **Contractor Site Supervisor or Designee** – Maintain inspections and test records for at least 3 years. Inspection and test records include routine inspections of tanks, piping, and oil handling and storage areas; leak testing of buried metallic tanks; integrity testing of aboveground containers/tanks; testing liquid level sensing devices; and integrity and leak testing of buried piping.

4.1.9 **Contractor Operations Manager** - Maintain integrity testing records of bulk storage tanks after material repair.

4.1.10 **Contractor Operations Manager** - Maintain tank construction/installation records, tank inspection records, and tank repair/alteration records for the life of the tank.

4.1.11 **Contractor Site Supervisor or Designee** - Keep records of storm water discharged from diked areas to storm drains or waters of the state.

4.1.12 **Contractor Site Supervisor, the RES Americas Project Manager , and the RES Americas Environmental Supervisor** - If an oil spill occurs that flows off site or is in excess of the reporting threshold, contact the appropriate federal, state, and local agencies.

4.1.13 **Contractor Site Supervisor, the RES Americas Project Manager , and the RES Americas Environmental Supervisor** - Provide a follow-up written report to the EPA Regional Administrator within 60 days if more than 1,000 gallons of oil are discharged in a single event or more than 42 gallons are discharged in each of two separate events in a 12-month period.

4.2 Training

4.2.1 **Contractor Site Supervisor or Designee** - Train all Contractor employees that handle oil or oil products at the site in: the operation and maintenance of equipment to prevent discharges; discharge response procedures; known discharges or failures of malfunctioning components/materials/equipment; applicable pollution control laws; rules and regulations; and general site/facility operations.

4.2.2 **RES Americas Environmental Supervisor** - Train all Contractor employees that handle oil or oil products at the site on the contents of the SPCC Plan.

4.2.3 **RES Americas Safety Supervisor** - Provide the initial awareness training during Safety Orientation for all employees, including the Concise Spill Response and Reporting Procedure found in Appendix 10.

4.3 Updating the SPCC Plan

4.3.1 **RES Americas HSQE Manager or Environmental Supervisor** - Amend the SPCC Plan if there is a change in the design, construction, operation, or maintenance that affects the potential for a discharge of oil. The amendments must be prepared and implemented as soon as possible.

4.3.2 **RES Americas Environmental Supervisor** - Update the site/facility diagram as construction, design, operational, or maintenance changes occur that affect the SPCC Plan contents.

5.0 PROCEDURE

5.1 SPCC Introduction

Contractors individually are subject to the SPCC Plan requirements due to the intended storage of over 1,320 gallons of new and used oil above ground (which, per 40 CFR Part 112, includes only those containers and equipment with storage volumes/capacities of 55 gallons or greater). Typically, the determination of whether a construction site has the potential to store more than 1,320 gallons of oil is based on the following containers (where applicable): gasoline and diesel tanks for

equipment fueling; new and/or used oil aboveground storage tanks or drums; new and/or used hydraulic fluid aboveground storage tanks or drums; asphalt batching tanks and hot oil reservoirs; storage containers for other oil-based products such as lubricating oils/grease and paint; transformers and other oil-filled operational equipment. In addition, oil product storage capacities for mobile equipment and other off-road vehicles are quantified for potential spill prediction data and planning for spill events.

This SPCC Plan includes a completed "Certification of the Applicability of the Substantial Harm Criteria" form in Appendix 1. This completed form indicates that the site/facility does not pose a substantial harm (risk) to the environment.

The SPCC Plan does not need to be submitted to the United States Environmental Protection Agency (USEPA), unless requested. However, a copy of the current SPCC Plan for the site/facility must be available during normal business hours.

RES Americas deems the importance of this program sufficient to warrant compliance <u>regardless</u> of quantities. Therefore, the following SPCC requirements, responses and actions will apply to RES and the associated Contractors.

5.2 Conformance with Applicable Requirements

This SPCC Plan has been prepared in accordance with the 40 CFR Part 112 and good engineering practices. In conforming to all applicable requirements of 40 CFR Part 112, no deviations are employed or claimed in the SPCC Plan unless noted in Section 3.4 – Equivalent Environmental Protection. In accordance with 40 CFR Part 112.7, the table at the end of this section provides a cross reference to all applicable requirements.

This site/facility will be in conformance with all applicable requirements found in 40 CFR Part 112 through the implementation and maintenance of this SPCC Plan.

5.3 Equivalent Environmental Protection

In accordance with 40 CFR Part 112.7(a)(2), a site/facility may deviate from certain aspects of the SPCC plan requirements provided that equivalent environmental protection is achieved through other means of spill prevention, control, or countermeasure. For this site/facility, the equivalent environmental protection includes:

Equivalent controls in lieu of the specific catch basin/quick-drainage system for loading and unloading areas required by 40 CFR 112.7(h). The option to contract with suppliers that operate tanker trucks to deliver new oil and pickup used oil in bulk exists. Based on discussions with USEPA regional and headquarter SPCC Program Coordinators (and their current interpretations), a "quick drainage system" is not required in the loading and unloading areas at the construction site (USEPA states that quick drainage systems are only required at unloading and loading racks/terminals; not unloading and loading areas), and the oil delivery/pickup supplier will provide prevention and control measures per 40 CFR 112.7(c) in these

loading and unloading areas through the specific procedures mentioned in Section 5.3 and outlined in 5.3.1 and Appendix 2.

Equivalent overflow protection in lieu of the specific devices listed in 40 CFR 112.8(c)(8). The filling of ASTs with new oil products will be observed by trained Contractor representatives and fuel suppliers using visual observation or direct vision gauges installed on the tanks or observation of the liquid per 40 CFR 112.8(c)(8)(iv). This equivalent control is discussed in detail in Appendix 2.

5.4 Site/Facility Description

This SPCC Plan is applicable for the construction of the Hog Creek Wind Project LLC and associated infrastructure located in Hardin County, partially within the city limits of the City of Dunkirk and north of the City of Dola. The nearest intersection is County Road 30 and County Road 113. The site is bordered upon the north by County Road 9, upon the south by County Road 50, the west by Main Street and the east by North Main Street.

The project offices and site lay-down yards are at the same locations.

The project has oil product storage containers and equipment with capacities ≥ 55 gallons and the respective types and volumes of oil products they contain. **Appendix 11** is a listing of the oil product storage containers and equipment expected to be used on the project. The list will be updated periodically throughout the life of the project. All Site Supervisors shall ensure that equivalent spill prevention and/or control measures are being implemented for new oil product storage containers and equipment brought onto the site.

5.5 Oil Products Storage Area Requirements

5.5.1 Oil product storage area will be established at the site lay-down yards. Aboveground Storage Tanks (ASTs) shall be positioned in such a way that the AST is protected from impact or rupture using berms or barriers. Gravity fed tanks shall not be used.

5.5.2 All ASTs containing fuel will be properly grounded for use during fuel transfer.

5.5.3 Mobile Equipment will be stored at various locations adjacent to the project roads, crane pads and collection system routes as the project progresses. **Figure 1** shows the general site layout.

5.6 Tank Labeling Requirements

5.6.1 ASTs containing diesel fuel will be labeled “Diesel Fuel” or “Fuel Oil,” includes a “No Smoking” sign, and also display the NFPA diamond with the following hazard rating designations: Health – 0, Flammability – 2, Reactivity - 0.

5.6.2 ASTs containing gasoline will be labeled “Flammable Liquid,” include a “No Smoking” sign, and also display the NFPA diamond with the following hazard rating designations: Health – 1, Flammability – 3, Reactivity - 0.

5.6.3 ASTs or other storage tanks containing used/waste oil will be labeled "Waste Oil" and "Combustible." The tanks will display the NFPA diamond with the following hazard rating designations: Health – 1, Flammability – 2, Reactivity - 0.

5.6.4 ASTs or other storage tanks containing virgin hydraulic oil, virgin motor and oil, gear oil, will be labeled "Combustible" and also display the NFPA diamond with the proper hazard rating designations.

5.7 Fire Prevention

5.7.1 A Class ABC Fire Extinguisher with a minimum 20 lb. rating remotely located and demarcated within 75 feet of the lay-down area.

5.8 Spill Prevention Measures

The following sections describe potential and reasonable scenarios in which a release on a construction site could occur and descriptions of discharge prevention measures both specific to the associated release scenarios, and general including procedures for routine handling of products (loading, unloading, and site/facility transfers), tank designs and prevention equipment.

5.8.1 Failure of Primary Storage Container

Due to corrosion, weathering, aging, stress, vandalism, accidental impact, or manufacturer defect, a storage container could leak or completely fail causing a gradual leak or instantaneous release of all the containers contents. Periodic inspections and integrity testing procedures (as described in Section 6.0) have been developed to minimize the potential for these types of failure. Bulk storage tanks are designed and equipped with various features to ensure unnecessary releases do not occur.

5.8.2 Storage Tank Material, Compatibility, and Design

The ASTs in use at the site/facility are cylindrical in design, constructed of steel, and compatible with storing fuels like diesel and gasoline. Gravity fed tanks shall not be used.

5.8.3 Storage Tank Secondary Containment

Contractors will confirm that ASTs storing oil products are equipped with secondary containment in the form of double-walled tanks. Contractor personnel will ensure good housekeeping practices are implemented when adding and removing oil from any AST to prevent oil run-off during precipitation events. Contractors will confirm that each AST is designed and constructed to meet Underwriters Laboratories, Inc. Standard UL 142 (or equivalent) for the storage of flammable and combustible liquids. In addition, Contractors will confirm that double-walled ASTs are equipped with monitoring gauges/ports (site glass) and emergency vents as required by the Standard UL 142 (or equivalent).

5.9 Spill Response Materials

Contractors will use spill kits to contain and/or divert inadvertent oil spills or leaks from ASTs, containers, and mobile equipment at the site. The inadvertent spills will be cleaned up immediately with the use of spill kits. The spill kits will be well-marked and accessible to all personnel provided access by RES Americas and maintained onsite at the following locations:

- Office Compound - 5 pound and 75 pound spill kits with containers, tarps, acid neutralizer, surplus oil sorbent/oil dry, booms, absorbent pads, and drip pans.
- Lay-down Yard (if separate from Office Compound) - 5 pound and 75 pound spill kits with containers, tarps, acid neutralizer, surplus oil sorbent/oil dry, booms, absorbent pads, and drip pans, drums or method of containment/storage until material is disposed.
- All Contractor Vehicles – pads and/or absorbent materials.
- All Contractor Mobile Equipment - pads and/or absorbent materials.
- Contractor Mechanic's Truck – drip pan, diapers and absorbent materials.
- Contractor Fuel/Lubrication Truck – drip pan, diapers and absorbent materials.

5.10 Physical Puncture, Rupture, or Overturn of Storage Containers

The nature of a construction site and the size of construction vehicles and equipment create opportunity for collisions of construction vehicles or equipment with oil storage containers. Such a collision could puncture, rupture, or overturn a storage container thereby causing a gradual or instantaneous release of the container's contents. Prudent placement and appropriate demarcation of oil storage areas, ensuring that procedures are followed for storing containers only in designated areas, and general site safety procedures are used to minimize the potential for collisions with oil storage containers. Because ASTs are equipped with or located within secondary containment, a release to the environment is unlikely; however, vehicle and mobile equipment operators are to be instructed in proper oil handling procedures to prevent releases from secondary containment.

5.11 Unanticipated Discovery of Oil/Gas/unknown pipeline

The project area is known to have underground pipelines. One call services have been notified to locate all possible lines, a sweeping system used to identify any lines not listed by One-call, and areas to be excavated have been potholed, using a hydrovac truck. The hydrovacing operations remove material down to a certain depth which would expose existing pipelines. Due to these operations, unknown pipeline discovery is not anticipated. However, in the event that an unknown pipeline is discovered, in a manner which results in a spill or release of material, the guidelines listed in the Spill Response and Reporting procedure found in Appendix 4 of this document will be followed. This procedure will be included in the mandatory site orientations and all personnel informed of steps to be followed in the case of an emergency spill.

5.12 Potential Operator Error during Loading/Unloading or Refueling Operations

Potential operator errors include overfilling, not disconnecting lines before vehicle departure, leaving pumps on, or fill valves left open that result in tank overflow. Operators are instructed in proper oil-handling procedures to prevent a release that includes regular periodic inspections of equipment.

5.12.1 Operator Error Prevention Procedures

Prior to being assigned to oil filling/transferring tasks, Contractor employees will be trained in and will be familiar with the following Work Instructions, contained in Appendix 2:

- Work Instruction Part 1 - New Oil Product Delivery and Unloading.
- Work Instruction Part 2 – Used/Waste Oil Product Pickup and Loading.
- Work Instruction Part 3 – Refueling Mobile Equipment.

5.12.2 High Liquid Level Indicators for AST

New oil, hydraulic fluid, and lubricating oils/grease ASTs are equipped with visual liquid level indicators (e.g., sight tube or volume gauge) or high level alarms. Empty containers are removed from the site or reused for used/waste oil storage.

5.13 Small Drips, Leaks and Spills

During routine operation and maintenance activities associated with equipment, small drips, leaks, and spills can occur. Spill prevention measures include drip pans, spill kits, and specific training for all employees handling oil containing products.

5.14 Other Discharge Prevention Measures

The following preventative maintenance program for oil-filled operating equipment shall be implemented by all Contractors affected by this plan:

5.14.1 Store and maintain equipment in a designated area, as appropriate.

5.14.2 Use secondary containment (drip pan) to catch spills when removing or changing fluids.

5.14.3 Use proper equipment (pumps, funnels) to transfer fluids.

5.14.4 Keep spill response materials readily available and properly stocked.

5.14.5 Transfer used/waste oils to designated recycling containers.

5.14.6 Equipment inspections for leaks and spills.

5.14.7 Immediate shut down and repair, if needed.

5.14.8 Preventative maintenance for equipment.

5.14.9 Low-level indicators and alarms on hydraulic equipment.

5.14.10 Prompt correction of visible discharges.

5.14.11 Prompt removal, clean up, and disposal of oil in secondary containment, according to state or federal requirements.

5.15 Unloading and Loading Procedures

Prior to being assigned to oil filling/transferring tasks, Contractor employees will be trained in and will be familiar with the following Work Instructions, contained in Appendix 2 (see also 6.10.1, Operator Error Prevention Procedures):

5.15.1 Work Instruction Part 1 - New Oil Product Delivery and Unloading.

5.15.2 Work Instruction Part 2 – Used/Waste Oil Product Pickup and Loading.

5.15.3 Work Instruction Part 3 – Refueling Mobile Equipment.

5.16 Security

The oil product containers are properly demarcated, located inside a fenced area and/or all ports/nozzles are secured with a lock. Adequate lighting should be provided in all lay-down areas (to detect spills at night and to help deter vandalism). Flashlights will be used for inspections in storage areas as needed.

5.17 Personnel, Training, and Spill Prevention Procedures

The Contractor Site Supervisors are the designated persons at the site who are accountable for spill prevention. The Contractor Site Supervisors (or their designee) and the RES Americas Environmental and Safety Supervisors are responsible for training.

Initial “Awareness” training will be used to train all personnel during site orientation. Employees who handle oil products, conduct equipment maintenance, or operate construction vehicles or equipment at the site will receive additional training. The level of detail for employee training will depend on the person's level of responsibility for spill prevention, control, and response. Operational employees with the day-to-day responsibility for spill prevention and response will be given additional training, as needed. This training shall cover the following topics as required under 40 CFR 112.7(f):

5.17.1 Overview of general site/facility operations.

5.17.2 Procedures for handling oil products.

5.17.3 Operation and maintenance of equipment used to prevent oil discharges.

5.17.4 Procedures and requirements for reporting oil discharge.

5.17.5 Overview of applicable pollution control laws, rules, and regulations.

5.17.6 Contents of the SPCC Plan for the site - In addition, company representatives who handle oil products at the site will receive oil discharge prevention briefings annually (or more frequently if a spill or discharge occurs) that describe any oil discharges, and any equipment failures or malfunctions that led or could have led to an oil spill or discharge. These oil discharge prevention briefings will also include an overview of any recent prevention or control measures that have been implemented.

5.18 Summary Table – Potential Spill Prediction Information

POTENTIAL SPILL PREDICTION INFORMATION			
Storage Tank/Container	**Type of Reasonable Failure**	**Rate of Oil Product Released**	**Direction of Flow & Containment**
Fuel/Lubrication Truck	**Fuel Tanks - Catastrophic Failure - Parked or Operational**	**Instantaneous**	**Surrounding Soil at Lay-down yard. Use Spill Kit & Activate Emergency Response Cleanup Contractor**
Fuel/Lubrication Truck	**Fuel Tanks - Leak, Spill, or Overfill**	**Gradual**	**Surrounding Soil. Use Spill Kit.**
Mobile Equipment	**Fuel Tank - Catastrophic Failure - Parked or Operational**	**Instantaneous**	**Surrounding Soil. Use Spill Kit & Activate Emergency Response Cleanup Contractor**
Mobile Equipment	**Fuel Tank - Leak, Spill, or Overfill**	**Gradual**	**Surrounding Soil. Use Spill Kit. Activate Emergency Response Cleanup Contractor (If above Reportable)**
Mobile Equipment	**Hydraulics - Leak, Spill, or Overfill**	**Gradual**	**Surrounding Soil. Use Spill Kit. Activate Emergency Response Cleanup Contractor (If above Reportable)**
Transformer	**Catastrophic Failure**	**Instantaneous**	**Surrounding Soil. Use Spill Kit & Activate Emergency Response Cleanup Contractor (If above Reportable)**
Transformer	**Leak**	**Gradual**	**Surrounding Soil. Use Spill Kit. Activate Emergency Response Cleanup Contractor (If above Reportable)**
Above Ground Storage Tank (AST)	**Primary Tank - Failure**	**Instantaneous**	**Secondary Tank**

POTENTIAL SPILL PREDICTION INFORMATION			
Storage Tank/Container	**Type of Reasonable Failure**	**Rate of Oil Product Released**	**Direction of Flow & Containment**
Above Ground Storage Tank (AST)	**Primary & Secondary Tank - Catastrophic Failure**	**Instantaneous**	**Surrounding Soil. Use Spill Kit & Activate Emergency Response Cleanup Contractor (If Above Reportable)**
Above Ground Storage Tank (AST)	**Tanks - Leak, Spill, or Overfill**	**Gradual**	**Surrounding Soil. Use Spill Kit Activate Emergency Response Cleanup Contractor (If Above Reportable)**

5.19 Inspections, Integrity Testing and Record Keeping

5.19.1 Inspections

Contractor personnel will conduct monthly inspections to confirm the SPCC Plan is being properly implemented and maintained. These inspections will cover all applicable oil product containers; oil filled equipment, ASTs and associated piping connections for evidence of leakage and deterioration. The inspection procedures include: (1) an inspection of all secondary containment structures and interstitial spaces on double walled ASTs for the presence of liquid (if equipped or accessible); (2) a visual inspection of the tank exterior for damage and corrosion; (3) an inspection of the normal operating and emergency vents on the ASTs (if equipped); (4) a check of the O ring/gasket on the emergency vents (if equipped); and (5) an inspection of the tank supports/foundations for signs of deterioration.

a) After a storm event, water that has accumulated in secondary containment will be inspected. If sheen is not present, the water will be released from containment onto the ground or into the storm water drainage system. If a sheen is noted, it will be removed from the water surface with absorbent pads before the water is released.

b) The monthly inspections will verify that spill kits are available at the site/facility.

c) The Monthly SPCC Plan Inspection Checklist is provided in Appendix 3.

5.19.2 Integrity Testing - As required by 40 CFR 112.8(c) (6), the ASTs must be tested using a non destructive testing method. The Steel Tank Institute Standard SP001 01 recommends that steel ASTs storing flammable and combustible liquids be tested at least every 10 years. The Contractor or the tank owner (if using rental equipment) will ensure the non destructive testing (at least every 10 years) is performed using a certified and licensed tank inspector. The following records must be kept:

a) The monthly inspection records will be maintained on site for the duration of the construction project (if appropriate facilities exist) and then on the RES Americas ECM for a minimum of three years.

b) For owned ASTs, the non-destructive integrity testing records will be maintained off site for the most recent test performed and for comparison with future testing results. Documentation related to a "critical situation" (see below) will be kept on site for the duration of the construction project, if appropriate facilities exist. Critical situations (as defined in paragraph 4.1 of STI Standard SP001-00) include situations where:

- A leak is found in the tank at any time.
- The tank has been exposed to a fire or other means which could cause damage.
- During or after a major storm event – tornado/hurricane.

5.20 Spill Response, Clean-up and Reporting Procedures

If an oil product spill occurs, Contractor representatives will follow the spill response, clean-up and reporting procedure provided in Appendix 4.

The clean-up of spills less than 25 gallons may be handled on site by Contractor representatives. However all spills regardless of size must be reported to the Environmental Lead on site. Migration potential and the need for activating the Spill Clean-up Contractor will be evaluated by RES Americas. If a spill occurs during new oil product delivery and unloading by a supplier, the supplier will implement their spill response, clean-up, and reporting procedures. The supplier is required by RES Americas to carry a copy of their spill response, clean-up, and reporting procedures, as well a spill kit while on site.

5.20.1 RES Classifications, Reporting Procedures and Thresholds.

a) If there is a spill which is reportable (>25 gal) RES will respond to SPCC protocol outlined in appendix 4: Spill Response, Clean-up, and Reporting Procedure; RES will obtain a spill report number generated by the OHEPA and attach record of this to the spill report. RES will categorized this is as a MAJOR SPILL and will be logged in the RAEMT 001 Environmental Incident Log located in appendix 12 of the CEP.

b) If the spill is not reportable (< the amounts noted above), it is MINOR SPILL. RES observers no lower thresholds in regards to spill reporting. All spill/release (hydrocarbon to soil) regardless of volume, will be documented and mitigated, therefore all spills/releases to ground must be reported to the Environmental Lead on site. Subsequent Spill Response From will be completed, and attached with photos and storage/disposal information.

c) If the spill is contained in the vehicle and it does not impact the ground, RES will record this as a NEAR MISS. Procedure dictates that the faulty equipment will be Locked Out and Tagged Out (LOTO) until repaired. The repaired equipment will be re-inspected by the EL or qualified RES personal before it is placed back into service.

d) The reporting requires an estimate of the quantity spilled and the approximate volume of spoil generated by the clean-up process. All spill information, including volumes will be included in the RAEMT001 Environmental Incident Log.

5.21 Emergency Contacts and Reporting Information

RES Americas Project Office	**Hog Creek Wind Project LLC Address:**	**Phone: TBD**
RES Americas Project Manager	**Bob Heckathorne**	**(816)427-1775**
RES Americas Environmental Supervisor	**Joseph Ridley**	**(303) 532 -6202**
RES Americas Safety Supervisor #1 **RES Americas Safety Supervisor #2**	**TBD**	

Federal, State, and Provincial Agencies

Ohio Environmental Protection Agency(OHEPA) Main Switchboard (Northwest District)	**(419) 352-8461**
Ohio24-Hour Emergency Response & Environmental Complaints Hotline	**1-800-282-9378**
National Response Center (NRC)	**800-424-8802**
USEPA Region 5	**(312) 353-2000**

Local Services – Fire, Police, and Hospitals

Hardin County Police Department 1025 S Main St, Kenton, OH 43326 **Emergency: 911**	**911 or (419) 673-1268**
US Fish and Wildlife Services 359 Main Rd, Delaware, OH 43015	**(740) 368-0137**
Findlay Fire Dept. 722 S Main St, Findlay, OH 45840	**(419) 424-7129**
Game Warden Ryan Kennedy Hardin County	**(419)429-8385**

Hospitals Bluffton Hospital 139 Garau St, Bluffton, OH 45817	**(419) 358-9010**

Government Agencies Written Address

Shannon Nabors OHEPA Chief (Northwest Division) 347 N. Dunbridge Road Bowling Green, Ohio 43402 Phone: (419) 352-8461 Fax: (419) 352-8468 **Central Office** Lazarus Government Center 50 W. Town St., Suite 700 Columbus, Ohio 43215 Phone: (614) 644-3020

Spill Response and Clean-up Contractors

Jeremy Vandewater Operations Manager HAZMAT/FIRE/SAFETY Allied International Emergency ***www.aiemergency.com***	Tel: 817-595-0100 Cell: 817-888-2516 Fax: 817-595-0125 Emergency Response: 1-800-980-7911 Emergency Response: 1-800-421-4911

6.0 DELIVERABLES

6.1 Management Approval and Certification of the Applicability of the Substantial Harm Criteria (Appendix 1).

6.2 SPCC Pan Review and Amendment (Appendix 15).

6.3 Monthly SPCC Plan Inspection Checklist (Appendix 3).

6.4 Spill Response Form (Appendix 5).

6.5 Reportable Spill Reports (#'s 20 and 21 in Appendix #4).

6.6 Waste Oil Log (Appendix 8).

6.7 Certificates and all other approvals (Appendix 14).

7.0 APPENDICES

Appendix 1	Management Approval and Certification of the Applicability of the Substantial Harm Criteria
Appendix 2	Work Instruction Part 1 – New Oil Product Delivery and Unloading Work Instruction Part 2 – Used/Waste Oil Product Pickup and Loading Work Instruction Part 3 – Lubrication/Maintenance/Refueling of Mobile Equipment
Appendix 3	Monthly SPCC Plan Inspection Checklist
Appendix 4	Spill Response, Clean-up, and Reporting Procedure
Appendix 5	Spill Response Form
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Appendix 15	SPCC Plan Review and Amendment
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Figure 1	Site/Facility Diagram

Appendix 1 – Management Approval and Certification of the Applicability of the Substantial Harm Criteria

Management Approval and Certification of the Applicability of the Substantial Harm Criteria

I hereby certify that management extends its full approval of this SPCC Plan and will commit the necessary resources for implementation. The programs and procedures outlined in this SPCC Plan will be implemented and periodically reviewed and updated in accordance with 40 CFR 112, as amended, and with applicable state and local requirements.

1. Does the site/facility transfer oil over water to or from vessels and does the site/facility have a total oil storage capacity greater than or equal to 42,000 gallons?

   Yes _____ No ____

2. Does the site/facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and does the site/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?

   Yes _____ No ____

3. Does the site/facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and is the site/facility located at a distance (as calculated using the appropriate formula in Attachment C-III in 40 CFR112) such that a discharge from the site/facility could cause injury to fish and wildlife and sensitive environments?

   Yes _____ No ____

4. Does the site/facility have a total oil storage capacity greater than or equal to 1 million (1,000,000 gallons) and is the site/facility located at a distance (as calculated using the appropriate formula in Attachment C-III in 40 CFR 112) such that a discharge from the site/facility would shut down public drinking water intake?

   Yes _____ No ____

5. Does the site/facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and has the site/facility experienced reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

   Yes _____ No ____

Additionally, 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 in this plan and in the checklist above is true, accurate and complete.

Name:	
Title:	
Signature:	
Date:	

Appendix 2
Work Instruction Part 1 - New Oil Product Delivery and Unloading
Work Instruction Part 2 – Used/Waste Oil Product Pickup and Loading
Work Instruction Part 3 – Lubrication/Maintenance/Refueling of Mobile Equipment

Work Instruction Part 1 - New Oil Product Delivery and Unloading

This procedure will be followed to prevent an oil spill or discharge during the delivery and unloading of fuel and new oil bulk products from a supplier tanker truck or delivery truck to Aboveground Storage Tanks (ASTs) and/or storage areas.

1. For the first delivery, the supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The supplier delivering the new oil products will be required to complete both a RES Americas Site Safety Induction and the required SPCC Training specific to the three applicable Work Instructions.

2. For all subsequent deliveries, the supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The Site Security personnel will inform RES Americas and the appropriate Contractor of the delivery.

3. All vehicles will be inspected in the quarantine area prior to engaging in any work on site. All new vehicles area subject to this inspection. Vehicles will be denied entry if they are found to be unfit to perform duties.

4. The Contractor representative will rendezvous with the supplier at the appropriate site lay-down yard.

5. The supplier delivering the new oil products will park the tanker/delivery truck on flat ground in the designated delivery and unloading area of the lay-down yard.

6. No elevated/gravity feed AST are allowed on RES sites.

7. For filling ASTs:

    - The Contractor representative will unlock (if necessary) the fill ports on the new oil product ASTs.

    - The supplier will check the available capacity in each new oil product AST to determine the approximate volume for filling the ASTs, recognizing absorbent materials are available if needed.

    - The supplier will attach the hose to the AST to begin the filling process.

    - During the filling process, the supplier and the Contractor representative will visually monitor (or use a high liquid level indicator if equipped) the liquid level in the AST and the supplier will shut off flow when the AST is properly filled.

    - After the new oil product unloading process is completed, the supplier will drain the hose into the AST, or if necessary, into a portable container.

    - The fill ports on the ASTs will be closed and locked.

8. For unloading bulk containers (e.g. 55-gallon drums):

    - The supplier will unload the bulk storage containers using appropriate handling equipment.

- The Contractor representative will visually monitor the unloading procedure and ensure that equipment, vehicles, and personnel do not interfere with the process.

- The bulk containers will be staged on spill containment pallets or Rotary Top Containers (RTCs).

9. The Contractor representative will use spill kits to control any minor spills that may occur during the filling or unloading process.

10. The supplier will prepare the tanker/delivery truck for departure. The supplier will check for any oil drips or leaks from under the truck. If any oil drips or leaks are observed, the supplier will take corrective actions to stop the drips or leaks. Prior to signing the supplier manifest and allowing the supplier to leave the site, the Contractor representative will also inspect the unloading area for any oil drips or spills that occurred during the unloading process. If any drips or spills occurred, the supplier and the Contractor representative will clean up the spill and properly dispose of the residue. The supplier will then leave the site.

11. The Contractor representative will lock all ports and nozzles on the ASTs after operational hours to prevent unauthorized access to the contents.

12. The Contractor representative will restock spill kits as needed.

Work Instruction Part 2 – Used/Waste Oil Product Pickup and Loading

In the event the project stores used/waste oil onsite in Aboveground Storage Tanks (ASTs) or drums, the procedure below will be followed to prevent a spill or discharge during the transferring and loading of used/waste oil to a tanker/recycling truck.

1. The Contractor representative will transfer the used/waste oil into the used/waste oil AST or drum with a pneumatic pump, electric pump, or pouring from collection containers and using direct observation.

2. After the transfer is complete, the Contractor representative will complete the Waste Oil Log found in Appendix 8.

3. All vehicles will be inspected at the site quarantine area prior to engaging in any work on site. All new vehicles area subject to this inspection. Vehicles will be denied entry if they are found to be unfit to perform their duties safely and leak free.

4. When the used/waste oil AST or drum is full, or as part of a standard frequency, a supplier will come to the site to pick up the used/waste oil.

5. For the first pickup, the supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The supplier delivering the new oil products will be required to complete both a RES Americas Site Safety Induction and the required SPCC Training specific to the three applicable Work Instructions.

6. For all subsequent pickups, the supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The Site Security personnel will inform RES Americas and the appropriate Contractor of the delivery.

7. The Contractor representative will rendezvous with the supplier at the appropriate site lay-down yard.

8. The supplier will park the tanker/recycling truck on flat ground in the designated loading area of the lay-down yard.

9. For vacuum pumping:

    - The supplier will attach the hose to the used/waste oil AST or drum to begin the pumping process.

    - During the pumping process, the supplier and the Contractor representative will visually monitor the liquid level in the tanker/recycling truck and shut off the flow when the AST or drum is emptied.

    - After the used/waste oil loading process is completed, the supplier will drain the hose into the tanker truck, or if necessary, into a portable container.

    - The drain port on the used/waste oil AST or drum will be closed.

10. For loading of bulk containers (e.g. 55-gallon drums):

- The supplier will check to ensure that lids are securely closed.
- The supplier will load the bulk storage containers using appropriate drum handling equipment and secure the load on the truck with adequate restraints.
- The Contractor representative will visually monitor loading procedure and ensure that equipment, vehicles, and personnel do not interfere with the process.

11. The Contractor representative will use spill kits to control any minor spills that may occur during the filling or loading process.

12. The supplier will prepare the tanker/delivery truck for departure. The supplier will check for any oil drips or leaks from under the truck. If any oil drips or leaks are observed, the supplier will take corrective actions to stop the drips or leaks. Prior to signing the supplier manifest and allowing the supplier to leave the site, the Contractor representative will also inspect the unloading area for any oil drips or spills that occurred during the unloading process. If any drips or spills occurred, the supplier and the Contractor representative will clean up the spill and properly dispose of the residue. The supplier will then leave the site.

13. The Contractor representative will lock all ports on the ASTs and close the lids on all drums after operational hours to prevent unauthorized access to the contents.

14. The Contractor representative will restock spill kits as needed.

Work Instruction Part 3 – Lubrication/Maintenance/Refueling of Mobile Equipment

There is a wide range of mobile equipment used on construction sites that require lubrication, maintenance, and refueling. This equipment is often too dispersed to bring to one central location. Most of the mobile equipment lubrication, maintenance, and refueling activities will be performed using a Fuel/Lubrication Truck. The following procedures will be followed:

1. Lubrication, maintenance, and refueling operations shall be performed in accordance with all federal, state, and local requirements. The Fuel/Lubrication Truck will be properly placarded according to the DOT requirements for Hazardous Materials found in 49 CFR 172.500. The Fuel/Lubrication Truck will be stocked with a spill kit (drip pan, diapers and absorbent materials) and Class ABC Fire Extinguisher with a minimum 10 lb. rating. Mechanical locks and other positive securing devices will be used to prevent acts of vandalism that would lead to an accidental discharge of oil product into the environment. The contact information for the Emergency Response and Clean-up Contractor will be readily available to the driver/operator inside the cab.

2. To the extent practical, all lubrication, maintenance, and refueling activities shall be at one or several designated locations with flat ground and at a minimum distance of 50 feet from any water-way, creek, river, stream, storm drain, or other body of water. The Contractor representative responsible for the lubrication, maintenance, and refueling will survey the area to ensure the optimal location is selected.

3. All fuel dispensing systems will be equipped with automatic shutoffs and hold open type latches. No artificial means of keeping the nozzle open are to be used.

4. The Contractor representative responsible for refueling shall wear the following PPE: Hard Hat, Safety Glasses, Steel-toe Work Boots, Work Gloves, Flame Retardant Clothing (covering the entire body), and a Class II Reflective Vest or equivalent. Chemical Resistant Gloves and Splash Goggles shall be made available if skin contact is expected.

5. The Contractor representative will have a radio that is capable of communicating with the site office and a mobile phone for contacting the Spill Response and Clean-up Contractor, in the event of an emergency.

6. Proper grounding procedures will be utilized during all fuel dispensing or filling operations. All other operating vehicles should remain a minimum of 100 feet from ongoing refueling operations. Fuel hoses will not be subject to running over by vehicles or equipment or dragged excessively resulting in abrasion, kinking, or damage.

7. Motors on equipment being refueled will be shut off and the parking brake set. The motor on the Fueling/Lubrication Truck will also be turned off; providing the battery can provide sufficient power to operate the onboard electric pump to complete the refueling process without draining the battery life.

8. Lubrication, maintenance, and refueling equipment will be inspected regularly for integrity and at each time of use. Evidence for corrosion or deterioration will be noted. The Contractor representative will inspect the mobile equipment being refueled for

leaks, drips, staining, or other evidence of leakage prior to initiating fuel transfer. Fuel will not be transferred if leakage is evident. Fueling will be stopped if leaks are identified during the refueling process. Defective or malfunctioning equipment shall be reported to the Contractor Site Supervisor. Systems are to be periodically tested according to the manufacturer's recommendations. There will be no topping off of equipment after an automatic shutoff device terminates the flow. Records of equipment maintenance, lubrication, and fuel transfers shall be kept in accordance with project requirements. Fuels that are colored for off road vehicle use only will not be used to fuel over the road vehicles. All minor spills should be cleaned up immediately.

9. The Contractor representative responsible for refueling must remain with the Fuel/Lubrication Truck and mobile equipment at all times during the process. There shall be absolutely no smoking or open flames within 50 feet of any refueling operation.

10. All precautions utilized for preventing spills and injuries during refueling operations will also be followed during lubrication and maintenance operations (e.g. addition of hydraulic oil or motor oil to reservoirs or engines). Lubrication and maintenance that must be performed onsite will be performed in a way that all fluids can be captured, contained, and properly transferred for storage and recycling without spillage. Drip pans will be used to contain and capture drips or spillage where it has the potential to occur.

11. After lubrication, maintenance, and refueling operations are completed, the Fuel/Lubrication Truck will be parked at the appropriate site lay-down yard.

Appendix 3 - Monthly SPCC Plan Inspection Checklist

Monthly SPCC Plan Inspection Checklist

The following inspection procedure will be performed to ensure the SPCC Plan is properly implemented. A response of "No" to any of the inspection requirement questions below requires corrective action to be taken.

Inspection Requirement Questions	Response to Inspection Yes/No/NA	If "No" - State Corrective Action, Person Responsible & Date for Completion
Are all ASTs, aboveground valves, or piping without leaks, spills and/or signs of deterioration? If equipped, are all anchor bolts on the ASTs in good condition and properly attached?		
Is the interstitial space (if accessible) between the double-walls of each tank without oil and water, and the liquid level gauge (if equipped) working properly?		
Are spill kits properly equipped and available in the designated areas?		
Are all gates and fences in the oil storage areas in good condition? All gates, doors, nozzles, and/or tanks equipped with locks to prevent vandalism? All gates, doors or ASTs locked when not in use?		
Is the lighting (if available) in the oil storage areas working properly?		
Are the used oil ASTs labeled "Used Oil" or "Waste Oil"? Have you inspected and cleaned the normal operating and emergency vents on the primary and secondary tanks of the AST (if equipped) and replaced vents if necessary?		
Have you checked to ensure that the O-rings/gaskets on the emergency vents are not damaged or deteriorated and replaced the O-rings/gaskets if necessary?		
Are all drums/containers storing petroleum products structurally sound and sealed tight?		
Are all drums / containers storing petroleum products in secondary containment?		

Are all waste containers e.g., buckets of grease, oil filters, waste oil, clearly labeled and disposed of properly and in a timely manner?		
Is heavy equipment which uses petroleum-based fuels and oils in sound working condition?		
Are all transformers, turbines, and any other oil-filled equipment free of leaks?		
Inspector's Name:		
Signature:		
Date:		
Notes:		

Appendix 4 – Spill Response, Clean-up and Reporting Procedure

In the event that a spill to land occurs, the following procedure is to be followed:

1. Stop operations.

2. Identify the product - check container design, warning labels, and markings.

3. If necessary, prevent personnel from approaching the area and keep them at a distance sufficiently removed that they will not be injured by, or cause a fire/explosion.

4. Stop the flow at the source - reduce or terminate the motion of product without endangering anyone.

5. The Contractor representative will report the spill to the Contractor Site Supervisor. Basic information such as type of spill, location and approximate volume will be provided.

6. The Contractor Site Supervisor will implement the plan and inform the RES Americas Project Manager and the RES Americas Environmental Supervisor of the spill. The RES Americas Project Manager will inform the client's Project Manager.

7. The clean-up of spills < 25 gallons of hydrocarbon will normally be handled on site by Contractor representatives under the supervision of the RES Environmental Lead. Migration potential and the need for activating the Spill Response and Clean-up Contractor will be evaluated by the Contractor and RES Americas for all spills.

8. The Contractor representatives responsible for spill clean-up shall wear appropriate PPE. This could include but is not limited to the following: Hard Hat, Safety Glasses, Rubber Boots, Chemical Resistant Gloves, and Flame Retardant Clothing (covering the entire body). Splash Goggles and a disposable, tyvek suit shall be made available if deemed necessary due to expected skin contact.

9. The Contractor representatives will apply the absorbent material in a sufficient amount to absorb the oil product. If the spill occurs in an area where the ground is sloped, temporary drain covers will be placed over catch basins in the area, if applicable. Absorbent will be applied in front of the leading edge of the spill; covering the entire spill area. If appropriate for the spill scenario, oil will be prevented from reaching the storm water catch basin by applying additional absorbent around (not in) the catch basin.

10. Shovels, brooms and mobile equipment will be used to thoroughly clean the area where the spill occurred. Oil contaminated soil in the area will be over-excavated as needed

11. All spent materials and oil contaminated soil will be transported to a secured storage area on site, placed in labeled secondary containment, and then properly disposed of at the:
    Special Waste Disposal
    Handcock Sanitary Landfill
    3763 Co Rd 140, Findlay, OH 45840

12. The RES Americas Project Manager and/or the RES Americas Environmental Supervisor or designee will inspect the location of the spill to ensure the clean up was performed correctly and that no recoverable residue remains.

13. Materials containing or otherwise contaminated with used/waste oil from which the used/waste oil has been properly drained or removed to the extent possible so that no visible signs of free-flowing oil remain in or on the material are subject to regulation as a Special Waste. A Special Waste/Waste Profile (Permit to Dispose) shall be obtained from Handcock Sanitary Landfill, **contact Donald Moses at: (419) 306-5668**.

14. Recommended Municipal Waste Landfills listed by Ohio Department of Environment and Quality:

Ohio Environmental Protection Agency(OHEPA)
Follow links below for: OHEPA http://www.epa.state.oh.us/ **Special Waste Disposal** **Handcock Sanitary Landfill** 3763 Co Rd 140, Findlay, OH 45840

15. In the event of a spill that is beyond the ability of the Contractor representatives and available equipment to properly clean-up (generally, > 25 gallons or larger); the Contractor Site Supervisor will coordinate with the RES Americas Project Manager and RES Americas Environmental Supervisor and arrange for assistance from the following Spill Response and Clean-up Contractor:

Allied International Emergency (AIE)	(817) 595-0100

16. The Spill Response and Clean-up Contractor will then clean-up the spill, absorbent materials, and any potential waste materials and dispose of at one of the Municipal Waste Landfills listed above. The Spill Clean-up Contractor will also decontaminate the area, equipment and surfaces that have been contacted by the spilled material.

17. For all spills, a Contractor representative will complete the Spill Response Form in Appendix 5. A copy of the Spill Response Form will be submitted to the Contractor Site Supervisor, the RES Americas Project Manager, and the RES Americas Environmental Advisor. A copy of the completed form will be maintained on site in the Construction Environmental Plan and on the RES Americas ECM.

18. In the event of a reportable spill – defined as spill events > 25 gallons of a hydrocarbon or any amount of hazardous substance. Spills that reach or could reach the waters of the state, or a pollutes the soil in a detrimental, harmful, or injurious manner or create a nuisance, the necessary information to be collected and provided is as follows:

    - Project point of contact and contact information.
    - Exact site address/location and phone number.

- Spill date and time.
- Type of material spilled (for example, fuel oil or hydraulic oil).
- Estimated quantity spilled.
- Estimated quantity entering navigable waters.
- Source of spill.
- Description of affected area (for example, spill covered dirt area 80 feet (ft) long by 20 ft wide and 20 ft of concrete drainage channel).
- Cause of the spill.
- Injuries or damages.
- Corrective actions taken.
- Whether evacuation is needed.
- Names of other parties contacted.
- Names of other parties to be contacted.

19. Per 40 CFR 112.4, if a spill of more than 1,000 gallons or two (2) spills of more than 42 gallons each within a 12-month period occurs that enters a storm water catch basin or flows off site and enters navigable waters of the United States, the Contractor Site Supervisor, the RES Americas Project Manager, and the RES Americas Environmental Supervisor will submit the following information to the USEPA within 60 days of the spill:
    - Construction site address and location.
    - Name of the person submitting the report.
    - Average and maximum oil storage or handling capacity of the site.
    - Corrective action and countermeasures taken (including a description of equipment repairs and replacement).
    - An adequate description of the site, including maps, flow diagrams, and topographical maps as necessary.
    - The cause of the spill/discharge as described in 40 CFR 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred.
    - Additional preventive measures taken or contemplated to minimize the possibility of recurrence.

Appendix 5 - Spill Response Form

Hog Creek Wind Project LLC
Spill Response Form

Date of Incident: _____ **Incident Number: _____**

Complete for all oil product spills. Provide a copy of the completed form to the Contractor Site Supervisor and the RES Americas Environmental Supervisor.

Information required (Note item number)

Item 1: Person Reporting Spill or Incident
Item 2: Type of Spill
Item 3: Location of Spill
Item 4: Describe Incident
Item 5: Actions Taken
Item 6: Env. Lead Notifications

Item 1: Person Reporting Spill

Name: Company:
Title: Address:
Telephone:
Signature:

Item 2: Type of Spill

Common Name of Spilled Substance:	
Quantity Spilled (Estimate):	
Concentration (Estimate):	

Item 3: Location of Spill

SPILLS TO LAND	SPILLS TO WATER
Name of Site:	Name of Water Body:
Street Address or Location (Coordinates; Road Number; Turbine Number)	Location of Discharge with Reference to Fixed Point:

Item 4: Incident Details

Affected Area			
Other Details			
Weather Conditions: Wind Direction and Speed:	Temperature:	Precipitation:	
Time Spill Started:	___ AM ___ PM	Time Spill Ended:	___AM ___PM

Item 5: Actions Taken

To Contain Spill or Impact of Incident:

To Clean-up Spill or Recover from Incident:

To Remove Clean-up Material:

To Prevent Reoccurrence:

Additional Information (As required) Presented on Attachments:

Item 6:
Environmental Lead Notifications:

Is there potential for groundwater contamination? Yes No (circle one)

Spill Quantity at Reportable Level? Yes No (circle one)

SPILL REPORTED TO:
Name/Number:
Organization/Agency:
Date/Time:

Closure Details:

Person Responsible for Managing Termination/Closure of Incident or Spill:

Name: _____ Phone: _____

Email: _____

Appendix 6 - USEPA Regional SPCC Contacts

USEPA REGIONAL SPCC CONTACTS	
Region and States Covered	**Phone Number**
USEPA Region V (covering MN, WI,MI, IL, IN, OH)	(312) 353-2000

Appendix 7 - State Environmental Protection Agency Spill Response Contacts

State Environmental Protection Agency Spill Response Contacts		
State	**Agency Name**	**Phone Number**
Ohio Environmental Protection Agency (OHEPA)		
Spill Reporting (24-Hour):		**OHEPA Hotline 1-800-282-9378**

Appendix 8 – Waste Oil Log

WASTE OIL LOG							
Date of Service	Operator/Driver's Name	Project Name	Type of Oil	Quantity Removed or Added	Destination	Summary of Equipment Serviced	EPA ID # (if applicable)

Appendix 9 - Photographs of Aboveground Storage Tanks (ASTs) and Spill Response Equipment to be used

To be provided after set up.

Appendix 10 – Concise Spill Response and Reporting Procedure

The following document will be displayed prominently at the site office area and in those areas where fueling and maintenance activities occur.

HOG CREEK WIND PROJECT LLC
CONCISE SPILL RESPONSE AND REPORTING PROCEDURE

SMALL SPILLS TO LAND (Hydrocarbon):

1. Stop operations.
2. Shut down all equipment and ignition sources in the area.
3. Identify the product - check container design, warning labels, and markings.
4. Assess personal safety.
5. Assess the extent of the spill.
6. Stop the flow at the source - reduce or terminate the motion of product without endangering yourself or anyone else.
7. Prevent personnel from approaching the area.
8. Utilize a spill kit to contain spill.
9. Immediately report the spill to your Supervisor, the RES Americas Project Manager, and the RES Americas Environmental Supervisor. Provide basic information such as location of the spill and approximate quantity.
10. Decontaminate the area, equipment and surfaces.
11. Clean up contaminated absorbent and waste materials. Contaminated absorbent and waste materials shall be transported to the Oil Product Storage Area until disposal at an approved disposal facility.
12. The Contractor Site Supervisor (and RES Americas, if needed) will complete the Spill Response Form found in Appendix 5 of this plan.

LARGE SPILLS GREATER THAN 25 GALLONS (Hydrocarbon) TO LAND:

1. Stop operations
2. Identify the product - check container design, warning labels, and markings.
3. Assess personal safety.
4. Assess the extent of the spill.
5. Prevent personnel from approaching the area.
6. Immediately report the spill to your Supervisor, the RES Americas Project Manager, and the RES Americas Environmental Supervisor. Provide basic information such as location of the spill and approximate quantity.
7. The RES Americas Project Manager and the RES Americas Environmental Supervisor will activate a Spill Response and Clean-up Contractor as needed.
8. The RES Americas Project Manager and the RES Americas Environmental Supervisor will notify the Ohio Environmental Protection Agency (OHEPA) and the National Response Center (NRC).
9. The Contractor Site Supervisor (and RES Americas, if needed) will complete the Spill Response Form found in Appendix 5 of this plan.

ALL SPILLS TO WATER:

1. In addition to the procedures outlined above for both scenarios, the RES Americas Project Manager and the RES Americas Environmental Supervisor will notify the Ohio Environmental Protection Agency (OHEPA) and the National Response Center (NRC).

OHEPA Spill Reporting (24-Hour):	**1(800) 282-9378**

Appendix 11 – Summary Tables for Oil Product Storage Containers and Equipment Used on Site

*This is an estimate based on data from previous projects constructed by RES Americas. Actual quantities and information shall be provided throughout the life of the project.

ROADS				
OIL PRODUCT STORAGE CONTAINERS & MOBILE EQUIPMENT w/ CONTROLS				
Storage Area	Tank/Container Description	Capacity	Contents	Secondary Containment or Spill Controls
Water Truck	Steel Tank	80 Gal	Diesel Fuel	Spill Kit
Fuel/Lubrication Truck	Steel Storage Tank	2000 Gal & 775 Gal	Diesel Fuel, ATF, Lube Oil, Motor Oil, Hydraulic Oil, Chassis Grease, Anti-Freeze	Spill Kit Note: Fuel truck will be within perimeter levee system at all times
Excavator CAT 320 C	Steel Fuel Tank & Hydraulic Reserve Tank	108 Gal	Diesel Fuel & Hydraulic Fluid	Spill Kit
(2) Motor Grader Komatsu GD655	Steel Fuel Tank& Hydraulic Reserve Tank	110 Gal	Diesel Fuel & Hydraulic Fluid	Spill Kit
Loader WA 380 Wheel Loader	Steel Fuel Tank & Hydraulic Reserve Tank	79 Gal	Diesel Fuel & Hydraulic Fluid	Spill Kit
Roller Hamm Smooth	Steel Fuel Tank & Hydraulic Reserve Tank	91 Gal	Diesel Fuel & Hydraulic Fluid	Spill Kits
Roller Hamm Pad Foot	Steel Fuel Tank & Hydraulic Reserve Tank	91 Gal	Diesel Fuel & Hydraulic Fluid	Spill Kits
Loader CAT 950	Steel Fuel Tank & Hydraulic Reserve Tank	83 Gal	Diesel Fuel & Hydraulic Fluid	Spill Kits
Pad-mount Trans- formers x 13	Dielectric Fluid	3,456 Gal	Mineral Oil	Spill Kit

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4/12/2017 3:12:17 PM

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Case No(s). 10-0654-EL-BGN, 16-1422-EL-BGA, 16-1423-EL-BGA

Summary: Correspondence of Hog Creek Wind Farm LLC in Compliance with Condition No. 18 - SPCC electronically filed by Teresa Orahood on behalf of Sally W. Bloomfield