

## SPILL PREVENTION AND RESPONSE PLAN

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### 1. INTRODUCTION

This plan outlines general procedures to follow during construction to prevent the release of hazardous materials to the environment, to identify and respond to incidents involving such releases, and to demonstrate compliance with applicable environmental best management practices. A stand-alone spill prevention and control plan may also be present onsite if quantities of hazardous materials exceed local, state or Federal thresholds, or if there are other factors that require the initiation of a detailed plan ( such as sensitive species, nearby waterways, etc.).

### 2. SPILL PREVENTION PROCEDURE

#### 2.1 Pre-Release Planning

- There are specific areas/activities on the project site that have the potential for the occurrence of spill-related incidents during construction. These areas/activities are listed below:
  - The transfer of fuel from tank trucks to storage tanks or to construction vehicle
  - Collection and transport of sanitary sewage by vacuum truck
  - Use of hazardous liquid products, including hydraulic fluids, solvents and lubricating oils
  - Release of operating fluids from construction equipment
  - Hazardous Materials Storage Areas
  - Waste Accumulation Areas
- The greatest potential for spills of hazardous materials will be at the storage tanks/containers and spills from equipment (e.g., hydraulic leaks, fuel spills). All reasonable means shall be taken to prevent spills or leaks.
- COMPANY and all contractors and subcontractors shall include appropriate spill containment and protective measures for activities that have the potential to release hazardous materials. Under no condition shall oil or contaminants be discharged onto the soil.
- Drip pans shall be used under portable equipment where there is potential for leaks or spills during maintenance, fueling or other operations. Drip pans shall be suitably sized for the equipment, constructed of impermeable material and not be allowed to overflow.
- Drip pans containing rain water or water from snow melt may be emptied to the ground surface only after visual inspection confirms there is no presence of hydrocarbons, i.e. oily sheen on the water surface.
- Leaking drums, hoses or equipment will be repaired or removed from the work area to prevent spills of hydrocarbons, chemicals or other materials. Oily equipment or materials shall not be stored in or near drainage areas where water “runoff” from the site could become contaminated.
- Vehicle and equipment maintenance shall be confined to designated areas, and precautions taken to preclude fluids from being discharged or spilled to land or drainage ditches.
- Drip pans shall be used under equipment where there is high use and/or a potential for leaks, including temporary generators and transformers, sampling lines, stop cocks, dispensing areas, etc. Permanent drip pans shall also be provided underneath the fueling ports of portable equipment not equipped with inherent secondary containment. Containment areas or drip pans

receiving oil or oily water shall not be allowed to overflow.

## **2.2 Fueling**

- Fuel release can be a major source of soil or water contamination. Vehicle fueling shall occur in areas where the potential for contamination is minimized in accordance with this plan, and as approved by the ES&H Manager.
- Equipment that remains stationary while in use for considerable periods of time, such as rigs and cranes, must adhere to strict fueling procedures, and appropriate spill containment devices shall be used.

## **2.3 Spill Kits**

- Spill kits complete with soaker pads, oil-absorbing materials and containment booms shall be required by all contractors and their subs. Absorbent mats, sand, clay or other absorbent materials shall be readily available for deployment to control or contain spilled material. Spill Containment Kits for work activities will be located in convenient areas and available for use with specific work activities.

## **2.4 Hazardous Materials Storage**

- To prevent accidental spills from reaching the environment, all temporary hazardous material storage areas shall be located at least 100 feet away from surface waters and buffer areas, or have structural controls that would prevent the migration of a spill into a drainage area. It is appropriate to provide temporary secondary containment when hazardous materials are going to be transferred to smaller containers or the likelihood for a release exists. The temporary secondary containment can be constructed of a concrete slab with curbs, a soil berm with a plastic liner, or a manufactured secondary containment system. In addition, the project will maintain an adequate number of spill kits around the site.

## **3. SPILL RESPONSE PROCEDURES**

- In the event a spill does occur employees will immediately notify their supervisor and will take immediate steps to stop the leak if possible. The exact actions taken to stop, reduce and contain the release are influenced by the severity of the spill, the quantity of material released, the circumstances of the release, the type of material and the spill location.
- All supervisors shall be responsible for dealing with spills and advise construction site personnel of any special or necessary actions that need to be taken as dictated by the situation.
- COMPANY and contractors and subcontractors must remain committed to resolving any substandard process or condition that may have contributed to any spills or releases. All spills, regardless of volume, will be recorded in a "Spill Log", and ES&H staff will take measures to ensure and document the cleanup, and identify corrective measures to prevent reoccurrence.
- All wastes generated by the projects spill response and cleanup shall be properly contained and labeled, and documented on the Waste Removal Log. The completed log must be attached to the project incident investigation report.

## **4. SPILL REPORTING**

- All spills will be reported internally to the Site Manager in accordance with the Incident Reporting. Immediately following a spill, initial reports to these individuals should identify the type and amount of material spilled and immediate actions taken to contain and respond to the

incident.

- OWNER will be notified and will make notifications to Regulatory authorities depending on the type material and quantity spilled. Therefore, it is critical that this information be immediately reported to the Supervisor responsible for notifying COMPANY management and the Safety Department of the incident.

## **5. TRAINING**

- Employees involved with hazardous spill response and major cleanup will be trained appropriately.

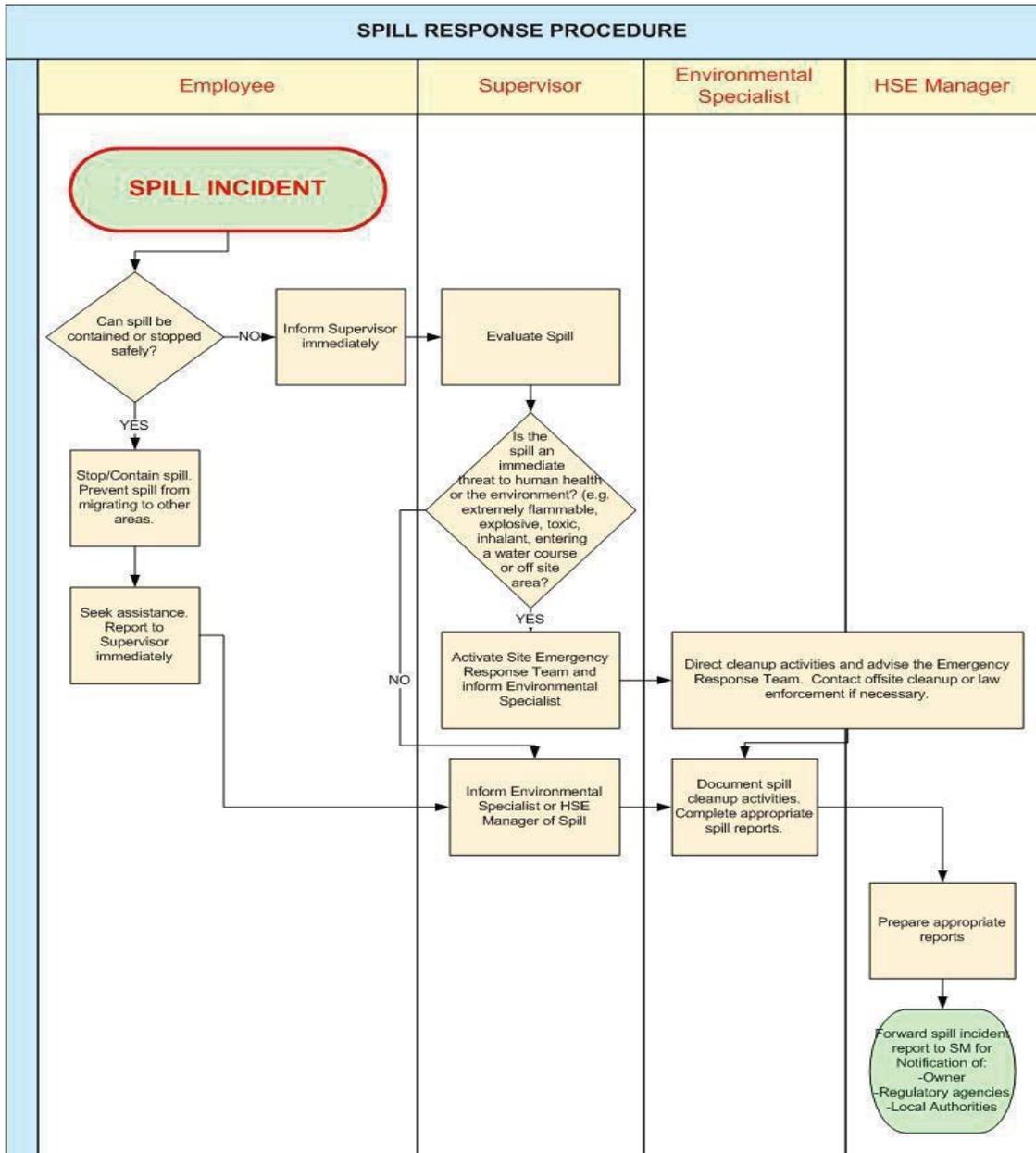
**TABLE 3-1 - ACTIVITIES FOR SPILL TO LAND**

<u>7.1.3.1.1 ACTIVITY</u>	<u>RESPONSIBILITY</u>
Take immediate action to stop or reduce the spill and contain it, without endangering the health and safety of the workers or local population (e.g. right tipped or fallen containers, plug holes or leaks, replace stoppers or lids, etc.).	Workers and/or supervisor
Immediately notify supervisor.	Workers
Initiate chain of notification as per EMP, "Incident Management".	Supervisor
Take any actions necessary to prevent the spill from contaminating ground water or offsite surface water (e.g. construct dirt berms) or from becoming airborne (e.g. cover with plastic sheeting).	Supervisor, after consultation with Environmental Specialist
Barricade the area until corrective action is completed.	Supervisor
Identify the spilled material.	Supervisor or Environmental Specialist
Clean up the spill. Remove the spilled material, including any contaminated soil. Remove any free liquid through adsorption, baling, vacuuming, pumping, etc.	Supervisor, after consultation with Environmental Specialist
Contain and dispose of the waste as determined by the Environmental Specialist	COMPANY, Contractor
Complete an Incident Investigation Report.	Supervisor

Notes:

1. Specialized contractors may be required in the event of a large spill.
2. Clean up of spills and disposal of the waste resulting from a spill due to a Contractor's activities is the responsibility of that Contractor.

## Exhibit



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Summary: Application Exhibit P electronically filed by Mr. Michael J. Settineri on behalf of Big Plain Solar, LLC