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July 12, 2019

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, OH 43215

Re: Case Nos. 09-479-EL-BGN, 11-3446-EL-BGA, 16-469-EL-BGA, and 16-2404-EL-BGA
In the Matter of the Application of Hardin Wind Energy LLC for a Certificate of Environmental Compatibility and Public Need for the Hardin Wind Farm.

Phase 3 – Compliance with Condition 54, Case No. 09-479-EL-BGN – Spill Prevention, Control, and Countermeasure Plan

Dear Ms. Troupe:

Hardin Wind Energy LLC ("Applicant") is certified to construct a wind-powered electric generation facility in Hardin County, Ohio, in accordance with the orders issued by the Ohio Power Siting Board ("OPSB") in the above-referenced cases.

The Applicant is currently preparing to begin Phase 3 of the project, which will entail construction of the access roads and turbine foundations that were not included in Phases 1 and 2.

At this time, for purposes of complying with the certificate conditions for Phase 3, the Applicant is filing the attached Spill Prevention Control and Countermeasure Plan. This document is being provided in compliance with Condition 54 of OPSB's March 22, 2010 Order in Case No. 09-479-EL-BGN.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

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COLUMBUS 39579-20 119113v1

Spill Prevention, Control, and Countermeasure (SPCC) Plan

For Construction of the Hardin County Wind Project

Prepared for
Invenergy LLC

July 2019

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July 2019

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Spill Prevention, Control, and Countermeasure (SPCC) Plan

July 2019

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1 Facility Information & General Requirements, 40 CFR § 112.7(a-f)

1.1 Introduction [40 CFR § 112.7(a)(1 & 2)]

Federal regulations promulgated on January 10, 1974 [Code of Federal Regulations, Title 40, Part 112 (40 CFR 112)] and revised on July 17, 2002, require the preparation and implementation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan for all nontransportation-related facilities which have an aggregate storage capacity greater than 1,320 gallons, and have the potential to discharge oil or oil-related substances to the navigable waters of the United States (U.S.) or adjoining shorelines.

The SPCC rule applies to owners or operators of facilities that drill, produce, gather, store, use, process, refine, transfer, distribute, or consume oil and oil products. The new rule (July 17, 2002) clarifies applicability to owners or operators that use oil in quantities that may be harmful as described in 40 CFR Part 110. The changes also allow for tracking the scope of the rule to conform to the expanded jurisdiction of the amended Clean Water Act (CWA). Amendments to the July 17, 2002 rule were made in December 2006, December 2008, and November 2009. The December 2006 amendments became effective on February 26, 2007. The December 2008 and November 2009 amendments became effective on January 14, 2010.

The federal regulations contained in 40 CFR Part 112 only apply to the storage of oil or other petroleum products at facilities with an aggregate above ground storage capacity greater than 1,320 gallons, and only containers with a capacity of 55 gallons or greater are counted for the storage of oil or other petroleum products. For the purposes of this SPCC Plan, "oil" is defined as oil of any kind or in any form, including but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetables oils, including oils from seeds, nuts, fruits, or kernels; and other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil (40 CFR 112.2). This SPCC Plan has been prepared in a manner as to satisfy the requirements of both the federal and state spill prevention regulations.

Under the SPCC regulations, facilities are required to report spills to the Environmental Protection Agency (EPA) Regional Administrator after discharging more than 1,000 U.S. gallons of oil-related substance in a single discharge or after discharging more than 42 U.S. gallons of oil-related substance in each of two discharges within a 12-month period.

This SPCC Plan uses the federal regulations of 40 CFR Part 112 as guidance and provides a response to each applicable requirement. Figures included are **Figure 1, Site Location**, and **Figure 2, Detailed Site Map**. **Table 1** is the **Inventory of Oil Storage Containers and Oil-Filled Equipment**. **Table 2, Emergency Notification Phone List**, provides a list of contacts to be notified in the event of a release. **Table 3** is a cross-reference of 40 CFR § 112 requirements and the equivalent response in this SPCC Plan. **Appendix A, Certification of the Applicability of Substantial Harm Criteria**, provides a listing of questions a facility must answer to determine if their activities could directly impact the environment or waterways. Answering "yes" to any of the questions federally requires a facility to develop a Facility

Response Plan that meets the requirements of the Code of Federal Regulations. **Appendix B, Oil Discharge Prevention Training Outline and Spill Reporting Guidelines**, includes a template for employee training. The **Self-Certification and Management Plan Review** is provided in **Appendix C**. **Appendix D, Monthly Tank Inspection Log**, provides a copy of the monthly inspection forms. **Appendix E, Containment Drainage Record Form**, provides a copy of the inspection and record form for discharging accumulated stormwater from secondary containment structures. Records of review and changes to this SPCC Plan are kept in **Appendix F, Plan Review, Amendment Requirements, and Change Tracking**. **Appendix G, Internal Annual Review**, includes the record of annual review.

The primary objective of the SPCC Plan is to prevent oil from reaching navigable waters. This Plan outlines the procedures, methods, and equipment used at the facility to comply with the EPA oil spill prevention, control and countermeasures standards, as well as inspection, training, and recordkeeping requirements. This Plan is designed to familiarize oil and hazardous material handling personnel at the facility with areas of potential spills, the procedures used to respond to a spill, and the methods and procedures used to inspect equipment so that the risk of an accidental spill is reduced. In accordance with 40 CFR Part 112, this SPCC Plan has been approved and signed by management with the authority to commit the necessary resources to fully implement the Plan. Management approval is provided in **Appendix C**.

As described in 40 CFR § 112.3 (g), the owner or operator of a Tier I qualified facility may self-certify the SPCC Plan, as provided in 40 CFR § 112.6. A Tier I qualified facility is defined as having:

- no individual aboveground oil storage container with a capacity greater than 5,000 gallons
- total aboveground oil storage capacity of 10,000 gallons or less
- no single discharge of oil to navigable waters or adjoining shorelines exceeding 1,000 gallons, or no two discharges of oil to navigable waters or adjoining shorelines each exceeding 42 gallons within any 12-month period in the three years prior to the certification date

Thus, the Hardin County Wind Project is a Tier I qualified facility, and this SPCC Plan is not required to be certified by a Registered Professional Engineer. Instead, Invenergy LLC is able to sign the Self-Certification provided in **Appendix C** attesting to the fact that the owner/operator has examined the facility and is familiar with the provisions of the applicable regulations, that the Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, that procedures for required inspections and testing have been established, and that the Plan is adequate for the facility.

Based on 40 CFR § 112.6 (a), Invenergy has chosen to comply with the requirements of paragraph (a)(3), which consists of preparing and implementing an SPCC Plan that meets a specified portion of requirements under §112.7. The template in Appendix G of 40 CFR § 112 was developed to meet these requirements; however, an equivalent SPCC Plan can be prepared to meet these requirements in lieu of following the Appendix G template. Because the Appendix G template was not followed in this SPCC Plan, **Table 3** has been provided to cross-reference the location of the 40 CFR § 112 requirements and the equivalent response in this SPCC Plan.

This SPCC Plan has been developed in a manner to identify the regulatory requirement cited in 40 CFR Part 112 followed by the appropriate response for this facility. For ease of reference, efforts have been made to discuss the applicable requirements in the general order provided in 40 CFR Part 112. Complete copies of this SPCC Plan are maintained on-site during construction and are made available to authorized representatives of the EPA for on-site review during normal working hours.

The owner/operator of the facility must document completion of review and evaluation of this Plan and must state whether or not the Plan was amended. The SPCC Plan Review and Evaluation page is included in **Appendix G.**

Include a discussion of your facility's conformance with the requirements listed in this part. This Plan has been developed for construction of the Hardin County Wind Project to ensure that, when properly implemented and maintained, the facility will minimize the potential for the facility to adversely impact the environment and will be in conformance with the applicable requirements established in 40 CFR 112.7. This Plan has full approval of management at a level of authority to commit resources necessary to fully implement the Plan. Responsibility for the day-to-day administration of the SPCC Plan and all discharge prevention activities at the facility is under John Roberts, Site Manager.

Provide an explanation of any non-conformance from the requirements of the regulations, and where applicable, describe in detail alternate methods and how you will achieve equivalent environmental protection – 40 CFR 112.7(a)(2). Not applicable for this facility.

1.2 Facility Description [40 CFR § 112.7(a)(3)]

Describe in your Plan the physical layout of the facility and include a facility diagram that provides the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located – 40 CFR 112.7(a)(3).

Name: Invenergy LLC – Hardin County Wind Project

Operator: John Roberts, Site Manager

Physical Address: South of the town of McGuffy, Hardin County, Ohio

Facility Location: The Hardin County Wind Project is located on rural farmland just south of the town of McGuffy in Hardin County, Ohio. Geographically, the facility is located at latitude 40° 37′ 57.37″ North and longitude 83° 47′ 31.93″ West. A map showing the geographic location of the Hardin County Wind Project is found in **Figure 1, Site Location**.

Description of facility including an indication of the nearest potential receiving waters: Hardin Wind Energy LLC, a subsidiary of Invenergy LLC, is planning to construct the Hardin County Wind Project. This SPCC Plan covers some portions of construction of the Hardin County Wind Project, including installation of a temporary laydown area, installation of permanent access roads (with culverts as needed), and installation of the wind turbines' foundations. This SPCC Plan does not cover installation of the 60 wind

turbines or installation of underground collection of cables connecting turbines and substation. The facility layout, construction limits, oil/product storage areas, structural spill controls, and flow direction are presented in **Figure 2, Site Drainage Diagram**.

Construction will consist of the following:

A temporary laydown area will be located north of turbine #98. This area will be used for equipment staging, parking, and material storage. All oil storage containers will be kept within the laydown area: an on-road diesel tank (500 gallons), an off-road diesel tank (500 gallons), and an unleaded fuel tank (500 gallons). The construction sequence for the temporary laydown area will involve installation of sediment control BMPs (as needed), installation of secondary containment for the oil storage tanks, securing storage, and site restoration.

A permanent access road will be installed for each turbine. These permanent access roads will be approximately 16 feet wide. An additional 8 feet of temporary workspace on each side of the road will be needed. Installation of the permanent access roads will involve installation of sediment control BMPs (as needed), clearing, grubbing, or stripping (as needed), and compacting the subgrade. Geogrid or cement will then be installed to stabilize the subgrade, and the gravel base will be applied. A gravel cap will also be applied to the permanent access roads. Following turbine erection, the soil will be decompacted along shoulders. All non-aggregate areas will be restored by applying topsoil and returning to the pre-construction conditions.

The site is generally flat, as the proposed turbines are located predominantly in rural farmland. Construction for the foundations of the 60 wind turbines will first involve installation of sediment control BMPs and clearing, grubbing or stripping (as needed). Clearing and grubbing will generally be restricted to the removal of planted agricultural crops or remains of crops, grass, and topsoil. Stone piers will then be installed where needed for excavation to prepare for the installation of turbine foundations. At each turbine location, the excavation will be approximately 100 feet wide, 100 feet long, and 11 feet deep. The materials removed from the excavation will be stockpiled in a horseshoe formation surrounding the excavation. Subsoil and topsoil will be segregated into separate piles. Subsoil may be used for backfilling the excavation, while topsoil removed during stripping will be graded into existing site topography or used as fill in non-structural areas following project completion. Dewatering may be required.

The soil base will be protected against damage by installing a flowable concrete mud mat after the final excavation. Following the installation of the mud mats, the foundations will be filled and compacted using the stockpiled native material. Following backfilling, the wind tower will be installed with a gravel area, approximately 10-feet wide, surrounding it. The rest of the work area will be returned to its pre-construction agricultural use.

Equipment used will include a backhoe or similar excavator, and trucks to transport personnel, equipment, and soil. The construction crews normally work from 7am to 5pm, five days per week. Work hours may fluctuate depending upon weather conditions and construction sequence. Upon completion of the

project, the project site will be stabilized and returned to pre-construction conditions, except permanent access roads, wind turbine footprint, and approximately 10 feet of gravel area surrounding each turbine.

The majority of the Hardin County Wind Project is located within the upper portion of the Scioto River watershed. The site is located within three of the upper Scioto River subwatersheds: Headwaters Scioto River, and Panther Creek-Scioto River. Natural and man-made drainage waterways are located in low-lying areas of the site, which allow stormwater to be discharged into the Scioto River, Cottonwood Ditch, and multiple associated unnamed tributaries. Additionally, a small portion of the Project is located within the Cessna Creek Watershed Assessment Unit. There will be no direct discharge to surface waters within this project area.

In the event of a spill, material will flow overland toward the Scioto River, Cottonwood Ditch, and multiple associated unnamed tributaries, depending on the location where the spill occurs. It is not expected that any other surface water will receive runoff or spilled materials from the site.

List the type of oil in each fixed container and its storage capacity. For mobile or portable containers, either provide the type of oil and storage capacity for each container or provide an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities - 112.7(a)(3)(i): Table 1 provides a detailed description of the Invenergy-owned containers of oil that are regulated by 40 CFR 112.7, including the type of oil and each container's storage capacity. Oil storage containers that will be kept on-site during construction include an on-road diesel tank (500 gallons), an off-road diesel tank (500 gallons), and an unleaded fuel tank (500 gallons). (No oil-filled equipment will be kept on-site during construction.) The location of all oil storage containers is the laydown area, which is depicted on **Figure 2, Site Drainage Diagram**.

Secondary containment structures will be sized to hold 100% of the stored volume plus the volume of a 2-year, 24-hour rain event. Each tank will be kept in a round steel containment basin with a height of 2-feet and a diameter of 16-feet (i.e., total approximate capacity of 400 ft^3 or 3,000 gallons). The tank storage area will also we surrounded by concrete deadmen and lined with a plastic membrane. Any spills will be cleaned up promptly and disposed of according to applicable regulations. Measures to prevent discharges are outlined in Sections 1.5, 3.1, 6.3, and 6.7 of this SPCC Plan. **Table 2** provides a contact list for the National Response Center and all appropriate federal, state, and local agencies who must be contacted in case of a discharge.

Summarize discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.) – 112.7(a)(3)(ii): Discharge prevention measures at the Hardin County Wind Project include training of appropriate personnel in the operation and maintenance of equipment to prevent and contain spills and discharge prevention briefings to ensure understanding of the SPCC Plan. Discharge prevention measures include visual inspection of tanks, containers, trucks, and secondary containment; drainage controls; and measures to prevent discharge during transfer operations. These prevention measures are discussed in more detail throughout the SPCC Plan.

Describe discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge – 112.7(a)(3)(iii): The facility is equipped with adequate containment systems and equipment to contain and control a discharge in order to limit the threat of harm to human health and the environment. For on-site storage tanks, secondary containment is provided by steel containment basins with a height of 2-feet (3,000-gallon capacity), as well as concrete deadmen with plastic membrane lining. Any drums or small storage items will be stored in a polyethylene secondary containment spill pallets. Drip pans will be placed when transferring oil products into equipment to collect any spills.

Describe countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor) – 112.7(a)(3)(iv): In the event of a spill at the Hardin County Wind Project, personnel will act to immediately eliminate the source, contain the spill, and minimize and control the quantity spilled. Secondary containment is provided, and drainage systems are engineered so that spills occurring within the facility will be contained within the construction limits. Should secondary containment be breached, earthen berms can be constructed by facility personnel to provide additional protection. In the event of smaller releases, necessary equipment and spill materials are located on-site. Depending on the magnitude of the release, Invenergy personnel will contact an emergency response contractor for further containment of the spill and cleanup if it is beyond the facility's capabilities. Appropriate authorities will also be contacted, as the situation requires. A list of emergency numbers is included in **Table 2**.

Petroleum products will not be allowed to accumulate within the secondary containment areas. Any accumulation of petroleum product is to be removed within 72 hours of discovery. The following standard operating procedure has been implemented for removing product accumulated within secondary containment:

- Determine the source of accumulated product and repair leaks from tanks, piping, or valves upon discovery.
- Small accumulations of petroleum products will be removed with absorbent material.
- Large accumulations of petroleum products will be removed with a portable pump or vacuum truck.
- Records consisting of date, time, and estimated quantity released, person responsible for removal, reason for the accumulation, and corrective action taken to prevent further release and accumulation will be maintained for each incident.

Initial response to a release associated with the tanks, containers, or transfer areas will be handled by the Hardin County Wind Project personnel under the direction of the John Roberts, Site Manager. Should secondary containment fail, steps must be taken to contain the spill in the smallest possible area and prevent product from entering a waterbody or leaving the construction limits. Shovels and heavy machinery may be used to construct earthen berms in the pathway of the spill. Booms and other absorbent material may be used for spill containment. Spill containment materials such as oil

dry/vermiculite, drip pads, and shovels are stored in the laydown area for spill response. In the event that the response efforts exceed the facility's capabilities, an emergency response contractor will be contacted.

Describe methods of disposal of recovered materials in accordance with applicable legal requirements – 112.7(a)(3)(v): Recovered, accumulated material will be properly contained within drums or other suitable containment vessels with adequate secondary containment and stored away from electrical, fire, and transportation areas until disposal is arranged. Spent absorbent material and booms will be placed in drums or other suitable containment vessels with adequate secondary containment and disposed of in accordance with local, state, and federal regulations. Contaminated soil will be contained on-site, on an impervious surface or encapsulated in polyethylene sheeting, and disposed of in accordance with local, state, and federal regulations.

Summarize contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b) – 112.7(a)(3)(vi): These phone numbers are included in **Table 2, Emergency Notification Phone List**.

1.3 Response Plan [40 CFR § 112.7(a)(4 & 5)]

Unless you have submitted a response plan under 40 CFR 112.20, provide information and procedures in your plan to enable a person reporting a discharge as described in 40 CFR 112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge; the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in 40 CFR 112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and the names of individuals and/or organization who have been contacted:

The person who identifies a spill at the facility will notify immediately the Site Manager. The Site Manager or a designee will investigate the situation and determine if the quantity of oil or hazardous material is adversely affecting public health and welfare or is of sufficient magnitude to be considered a safety hazard and/or pollution problem. If so, he or she will take immediate action in accordance with this SPCC Plan. Containment and clean-up operations may vary according to the extent of the spill and the type of material spilled.

The facility stocks several waste containers that can be used for the clean-up of oil spills. Absorbent pads, floor dri, and spill kits are kept readily available at the construction site's laydown area. Construction equipment can be used to create earthen dikes to capture an oil spill prior to leaving the site's construction limits. In the event of a large spill that exceeds the capabilities of facility personnel, a spill response contractor will be called to assist.

In accordance with §112.4(a), whenever the facility has discharged more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or discharged more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b), occurring within any twelve month period, personnel will submit the following information to the Regional Administrator within 60 days from the time the facility becomes subject to this section:

In accordance with State of Ohio guidelines, any petroleum product spill or release (such as gasoline or oil) to the ground or a sheen on a surface water must be reported to the Ohio Environmental Protection Agency (EPA) 24-hour emergency spill hotline at 1-800-282-9378. Records of such spills or releases must be maintained for at least three (3) years.

The reportable quantities for spills or releases involving a petroleum product (diesel fuel, gasoline, hydraulic fluid, etc.) are:

- any amount of petroleum that causes a film or sheen on a waterway
- any spill or release to the environment (not contained on the spiller's property) of 25 gallons or more
- spills of petroleum products of 25 gallons or more on or adjacent to a public roadway are always reportable

A spill of a reportable quantity must be reported verbally to the Ohio EPA, local fire department, and LEPC as soon as possible and within 30 minutes of knowledge of the release, unless notification within that timeframe is impractical due to uncertain circumstances. Additional information on what to do in the event of a spill is available at the following web address: https://epa.ohio.gov/dir/oer.

In addition to Ohio requirements for reporting a spill, federal requirements for spill reporting may apply. The phone number for the National Response Center is (800) 424-8802. EPA guidance for reporting a spill can be found at the following web address: http://www.epa.gov/oem/content/reporting/index.htm.

From the time the facility becomes subject to this section, the following information must be submitted to the Regional Administrator:

- Name of the facility
- Your name
- Location of the facility
- Maximum storage or handling capacity of the facility and normal daily throughput
- Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements

- An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary
- The cause of such discharge as described in §112.1(b), including a failure analysis of the system or subsystem in which the failure occurred
- Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

Unless you have submitted a response plan under 112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.

Information provided in **Sections 1.2 and 1.3** of this SPCC Plan outline the procedures to be implemented should a discharge occur. During the construction period, this SPCC Plan is maintained in a common location accessible to all personnel. Invenergy is not required to maintain a Facility Response Plan for the Hardin County Wind Project per 40 CFR §112.20.

1.4 Spill Prediction [40 CFR § 112.7(b)]

Prediction of the direction, rate of flow, and total quantity of applicable substances which could be discharged from the facility where experience indicates a reasonable potential for equipment failure and/or human error:

A determination of substantial harm was performed and is provided in **Appendix A**. **Table 1, Inventory of Oil Storage Containers and Oil-Filled Equipment**, includes a prediction of the direction and total quantity of oil that could be discharged from the facility as a result of an equipment failure. Due to the relatively small size of the tanks and containers on-site, the rate of flow is assumed worst-case or 100 percent loss with instantaneous flow to secondary containment or the lowest collection point.

Of the equipment failure types, oil transfer operations represent the highest potential for spills. Oil is delivered via an outside vendor's tank truck. Vehicles will be fueled in the laydown yard, and large equipment will be fueled in the field. Fuel transfers are monitored by the fuel vendor; therefore, fuel spills during transfers will likely be small. Direction of spill flow will depend on where fuel transfers occur, but are generally expected to migrate toward the Scioto River, Cottonwood Ditch, or associated unnamed tributaries.

All oil storage containers, which include an off-road diesel storage tank, on-road diesel storage tank, and unleaded fuel tank, are kept within the laydown area. Each tank will be kept in a round steel containment basin with a height of 2-feet and capacity of 3,000 gallons. The tank storage area will also we surrounded by concrete deadmen and lined with a plastic membrane. In the unlikely event of damage or complete failure of a container, these forms of secondary containment would likely prevent spills. If secondary

containment failed, resulting in a spill, the material would likely be contained within the laydown area or flow toward the Scioto River, Cottonwood Ditch, or associated unnamed tributaries.

1.5 Spill Containment [40 CFR § 112.7(c)]

Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b), except as provided in paragraph (k) of this section for qualified oil-filled operational equipment, and except as provided in §112.9(d)(3) for flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank, will not escape the containment system before cleanup occurs. In determining the method, design, and capacity for secondary containment, you need only to address the typical failure mode and the most likely quantity of oil that would be discharged. Secondary containment may be either active or passive in design. At a minimum, you must use one of the following prevention systems or its equivalent:

Used by Facility:

Yes	No	
☒	☐	Dikes, berms, or retaining walls sufficiently impervious to contain oil
☐	☒	Double-walled tanks
☒	☐	Curbing or drip pans
☐	☒	Sumps and collection systems
☐	☒	Culverting, gutters, or other drainage systems
☐	☒	Weirs, booms, or other barriers
☐	☒	Spill diversion ponds
☐	☒	Retention ponds
☒	☐	Sorbent materials

Additional comments: The facility is equipped with adequate containment systems and equipment to contain and control a discharge in order to limit the threat of harm to human health and the environment. The off-road diesel tank, on-road diesel tank, and unleaded fuel tank are each kept within a round steel containment basin with a height of 2-feet and diameter of 16-feet (capacity of 3,000 gallons). The tank storage area will also we surrounded by concrete deadmen and lined with a plastic membrane.

Secondary containment for fueling activities and fuel vendor transfers is provided by active containment. Drip pans or pails are placed prior to commencement of the transfer. Spill kits are staged at the laydown area. In addition, the contractor has access to construction equipment which could be used to create an earthen berm to contain large spills within the site's construction limits. Sediment control Best Management Practices (BMPs), such as silt fence, straw bales, and sediment control logs, installed per the Stormwater Pollution Prevention Plan (SWPPP) may aid in containing spills within the construction limits.

Table 1, Inventory of Oil Storage Containers and Oil-Filled Equipment, provides a list of containers and associated secondary containment measures. Discharge control equipment at the facility includes absorbent booms and pads, oil dry/vermiculite, empty open-topped drums, and shovels.

1.6 Impracticability [40 CFR § 112.7(d)]

If your Plan requires Professional Engineer certification, and it is determined that it is not practical to install any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), and 112.12(c)(11) to prevent a discharge as described in §112.1(b), you must clearly explain in your Plan why such measures are not practicable: This facility is equipped with appropriate containment and diversionary structures or equipment to prevent a discharge of a harmful quantity of oil. Controls, spill containment equipment, and procedures listed in **Section 1.5** have been implemented to address the potential spill scenarios outlined in **Section 1.4**. The facility is equipped with three of the nine prevention systems listed in **Section 1.5**. The off-road diesel tank, on-road diesel tank, and unleaded fuel tank are each kept within a round steel containment basin with a height of 2-feet and capacity of 3,000 gallons. The tank storage area will also we surrounded by concrete deadmen and lined with a plastic membrane. The facility is also equipped with booms and pads, sorbent materials, shovels, and containers to respond to spills. Several spill kits are kept in the laydown area.

For bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping: Hardin County Wind Project personnel regularly conduct visual inspections of all tanks, containers, valves, and secondary containment; formal inspections are conducted on a monthly basis. Potential structural failures, housekeeping problems, and general tank conditions are noted. Any problems are reported and promptly corrected. These inspections are documented using the form found in **Appendix D, Monthly Tank Inspection Log**. The report forms are signed and dated by the inspector and kept on file at the facility for a minimum of three (3) years.

Unless you have submitted a response plan under 112.20, provide in your plan the following: a spill contingency plan, including a written commitment of the manpower, equipment, and materials required to ensure timely and effective action to minimize damage resulting from a spill event. The Hardin County Wind Project maintains the appropriate materials to respond to any spills. A plan is in place to respond to and report any spills in a timely manner.

1.7 Inspections, Tests, and Records [40 CFR § 112.7(e)]

Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph: Hardin County Wind Project personnel regularly conduct visual inspections of the facility tanks, containers, valves, pumps, transfer areas, and secondary containment for leaks, corrosion, pitting, cracking, and deterioration of foundation/supports. Formal inspections are conducted on a monthly basis. All tanker trucks transporting product are inspected for leaks prior to loading of product. The loading and unloading areas are inspected for spills prior to arrival and after departure of tanker trucks. The written inspection procedures for oil containers are maintained by Invenergy as standard operating procedures. The report forms are signed and dated by the inspector and retained with Hardin County Wind Project's environmental files for a minimum of three (3) years from the date of completion. Inspections are documented on the Monthly Tank Inspection Log provided in **Appendix D**.

1.8 Personnel Training and Discharge Prevention Procedures [40 CFR § 112.7(f)]

At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan 112.7(f)(1): All Hardin County Wind Farm personnel responsible for handling or dispensing oil participate in the spill prevention and control training program and will be made aware of the contents of this SPCC Plan. All new petroleum-handling personnel will be instructed in the operation and maintenance of equipment to prevent and contain discharges, discharge procedure protocols, and all applicable laws, rules, and regulations. All oil-handling employees participate in a regularly scheduled review and update of spill prevention and control procedures. Training will include, at a minimum, the following:

- Review of the SPCC Plan.
- General facility operations.
- Familiarization with storage areas containing tools and equipment necessary for spill response.
- Familiarization with the design and use of inspection forms.
- Operation and maintenance of equipment to prevent discharges.
- Discharge procedure protocols.
- Applicable pollution control laws, rules, and regulations.
- Instruction regarding proper notification procedures in the event of a spill.

Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management – 112.7(f)(2): John Roberts, Site Manager, is accountable for spill prevention at the Hardin County Wind Project. A contact list including the names and telephone numbers is provided in **Table 2, Emergency Notification Phone List**.

Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures – 112.8(f)(3): Every oil-handling employee will participate in continuing training to maintain proficiency, to learn new techniques and procedures, and to reinforce safety and quality consciousness. Personnel are instructed in the contents of this plan on an annual basis during discharge prevention briefings. Any known discharges, failures, or malfunctions that resulted in a discharge of oil, as well as recently developed precautionary measures, are discussed at these briefings. An example of the facility's oil discharge prevention training outline is included in **Appendix B**. A copy of the SPCC Plan will be kept on-site during construction of the Hardin County Wind Project. A record of the annual SPCC Plan review is attached in **Appendix G, Internal Annual Review**.

2 Security, 40 CFR § 112.7(g)

Describe in your Plan how you secure and control access to the oil handling, processing and storage areas – 112.7(g): The Hardin County Wind Project is not fenced, and there is not a gate installed at the laydown area entrance. The facility is primarily secured by its remote location, where the threats of unauthorized access or vandalism are minimal. Access to oil storage containers is restricted with locks.

Secure master flow and drain valves – 112.7(g): The tank valves are kept closed and securely locked when not in use. The tanks are located in areas frequently visited by contractor staff. Any leaks associated with the tanks during loading or unloading operations will remain within the drips pans or pails used as secondary containment.

There are no containment basin release valves at the site. Following rainfall events, accumulated precipitation is allowed to evaporate or percolate into the subsurface. Any accumulated materials in secondary containment must be pumped out or collected with absorbent materials. As such, there is no direct outward flow of spilled substances from tanks or associated lines that could enter the waters of the state.

Prevent unauthorized access to starter controls on oil pumps – 112.7(g): All oil storage containers are kept in the laydown area, which is frequently visited by Hardin County Wind Project personnel. Mobile fueling equipment is regularly under the supervision of Invenergy personnel. Furthermore, the fueling nozzles are chained within locks to prevent unauthorized use. Any leaks associated with the malfunctioning of the fueling equipment will either remain on the pails/drip pans or flow onto the soil surrounding the transfer areas. Large spills have the potential to flow toward the Scioto River, Cottonwood Ditch, or associated unnamed tributaries.

Secure out-of-service and loading/unloading connections of oil pipelines – 112.7(g): Not applicable; the Hardin County Wind Project is not connected to an oil pipeline.

Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges – 112.7(g): Lighting adequate to prevent acts of vandalism and assist in the discovery of oil discharges is provided in the laydown area.

3 Facility Loading/Unloading Operations, 40 CFR § 112.7(h)

Per 40 CFR 112.2, loading/unloading racks are defined as fixed structures (such as a platform or gangway) necessary for loading or unloading a tank truck or tank car. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices. EPA guidance indicates that this definition is not intended to include simple oil loading or unloading operations.

Therefore, the Hardin County Wind Project does not have any loading or unloading racks and 40 CFR 112.7(h) is not applicable. However, loading and unloading operations do occur at the Hardin County Wind Project. Vehicles will be fueled in the laydown yard, and large equipment will be fueled in the field. In accordance with good engineering practice, the possibility of a release occurring during oil transfer operations or fuel transfer processes was considered and evaluated for the likelihood of being contained within the construction limits by secondary containment or diversionary structures, as required by 40 CFR 112.7(c).

3.1 Adequate Secondary Containment of Loading Rack [40 CFR § 112.7(h)(1)]

Where loading/unloading rack drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading/unloading racks. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility – 112.7(h)(1): Not applicable; the Hardin County Wind Project is not equipped with a loading/unloading rack.

3.2 Warning and Barrier System [40 CFR § 112.7(h)(2)]

Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks or vehicle brake interlock system in the area adjacent to a loading/unloading rack, to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines – 112.7(h)(2): Loading/unloading operations will occur from the on-road diesel tank, off-road diesel tank, and unleaded fuel tank during construction of the Hardin County Wind Project. Fueling of vehicles and large equipment and refilling of bulk fuel tanks occurs without passive containment. Refueling of construction equipment will not be allowed within 100 feet of any stream or wetland.

During fuel transfers at the Hardin County Wind Project, fueling vendor drivers are responsible for properly loading trucks and are to remain present at the vehicle and monitor the transfer during the entire loading operations. Vehicle engines are required to be stopped and brakes are to be engaged while loading. Premature departures are prevented by chocking the tanker truck wheels prior to loading. The chocks are not removed until the bulk transfer has been completed, the lines stowed, and the valves have been checked to ensure they are secured. Warning lights, signs, or other physical barriers may also be

used (as applicable) to prevent trucks from departing prior to complete disconnection of flexible or fixed oil transfer lines and to prevent other vehicles from entering the area while loading occurs.

The oil loading operation is closely supervised by Hardin County Wind Project personnel to prevent spills. Hardin County Wind Project personnel are to remain present during all loading operations and are required to monitor transfer activities at all times. All Hardin County Wind Project personnel have been instructed in the following loading procedures:

1. Place wheel chocks, traffic cones, or other device to prevent bulk tanker truck movement or premature departure.
2. Place drip pan or pail to prevent spills.
3. Check the reserves in the tank before loading commences.
4. Continuously attend the loading operation while pumping oil into the tank.
5. Check for line disconnection before vehicle departure.
6. Ensure bottom valves on the tanker are closed and covers on the stationary tank are secured.
7. Remove wheel chocks, traffic cones, or other device from the bulk tanker truck.

In the event of a small oil spill, spill kits and supplies are readily available to recover oil. Significant spills will migrate toward the Scioto River, Cottonwood Ditch, or associated unnamed tributaries. An outside contractor will be called to assist in oil recovery in the event of a large spill. Employees are trained spill prevention, containment, and retrieval methods, as described in **Section 1.8**. In the event of a spill, employees will respond as indicated in **Section 1.3**.

3.3 Bottom Drains of Vehicles Examined [40 CFR § 112.7(h)(3)]

Prior to filling and departure of any tank car or tank truck, closely inspect for discharges from the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit – 112.7(h)(3): Prior to filling and departure of any tank truck, the lowermost drains and all other outlets are closely examined for leakage by the drivers. If necessary, appropriate repairs are made immediately.

4 Additional General Requirements, 40 CFR § 112.7(i, j & k)

4.1 Brittle Fracture [40 CFR § 112.7(i)]

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action. Not applicable; there are no field-constructed aboveground containers present for construction of the Hardin County Wind Project.

4.2 State Rules, Regulations and Guidelines [40 CFR § 112.7(j)]

In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines: The State of Ohio defers to the Code of Federal Regulations for matters regarding the preparation and implementation of a SPCC Plan. Refer to **Appendix B** for Ohio spill reporting guidelines.

4.3 Qualified Oil-Filled Operational Equipment [40 CFR § 112.7(k)]

The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section: Not applicable for this facility. The containment structures and procedures described in **Section 1.5** meet the general secondary containment requirements. Adequate secondary containment is provided to prevent migration of a spill from oil-filled equipment off-site. Furthermore, the facility has had no single discharge from any oil-filled operational equipment exceeding 1,000 gallons, nor has it had two discharges exceeding 42 gallons within any twelve month period in the three years prior to the certification date of this SPCC Plan.

5 Facility Drainage, 40 CFR § 112.8(a)(b) & 40 CFR § 112.12(a)(b)

5.1 Facility Drainage Requirements [40 CFR § 112.8(a) & § 112.12(a)]

The owner/operator of an onshore facility (excluding a product facility) must meet the general requirements for the Plan under 112.7, and the specific discharge prevention and containment procedures listed in this section – 112.8(a): This Plan has been developed for construction of the Hardin County Wind Project to ensure that, when properly implemented and maintained, the facility will be in conformance with the applicable requirements established in 40 CFR 112.7 and the specific prevention and containment procedures listed in this section. This Plan has full approval of management at a level of authority to commit resources necessary to fully implement the Plan. Responsibility for the day-to-day administration of the SPCC Plan and all discharge prevention activities at the facility is under John Roberts, Site Manager.

5.2 Drainage from the Diked Areas [40 CFR § 112.8(b)(1 & 2) & § 112.12(b)(1 & 2)]

Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged – 112.8(b)(1): The facility does not typically discharge stormwater. Rather, precipitation that accumulates within secondary containment structures is allowed to evaporate or infiltrate. Because secondary containment devices are not equipped with manually-operated valves to discharge precipitation, oil storage areas exposed to stormwater may have to be periodically drained. For example, drip pans or the polyethylene secondary containment spill pallets may fill up over time and need to be emptied.

Prior to discharging water from the secondary containment structures, John Roberts or a designee will visually inspect the water for oil sheen or other visible signs of contamination. Any product observed in the water is absorbed with oil drip pads or sorbent booms prior to release. Large quantities of product will be removed via vacuum truck and properly disposed of via applicable local, state, and federal regulations. Records are kept of all discharge events. The discharge monitoring reports for recording basin discharge events are included in **Appendix E, Containment Drainage Record Form**. These inspection records are maintained for a minimum of three (3) years in Hardin County Wind Project's environmental files.

Use valves of manual, open-and-closed design, for the drainage of diked areas. You may not use flapper-type valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater as provided in paragraphs (c)(3)(ii), (iii) and (iv) of this section – 112.8(b)(2): The secondary containment structures are not equipped with manually-operated

valves. Spilled materials that accumulate in containment structures must be manually pumped out or collected with absorbent materials.

Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding – 112.8(b)(3): The Hardin County Wind Project is generally flat. Any leaks associated with the malfunctioning of fueling equipment or damaged equipment will discharge into the drip pans or pails and possibly onto the surrounding soil depending on the quantity of the spill. Large spills exceeding the capacity of the drip pans or pails will migrate toward the Scioto River, Cottonwood Ditch, or associated unnamed tributaries (see **Section 1.4**). Spill kits and other sorbent materials are available on-site to quickly contain spills and prevent off-site release of oil. Spilled materials are absorbed, vacuumed, or excavated; spilled materials are either reclaimed, placed in 55-gallon drums for recycling, or disposed of properly according to local, state, and federal regulations.

If facility drainage is not engineered as in paragraph (b)(3) of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility – 112.8(b)(4): The facility is properly engineered with a drainage system that is capable of retaining a spill.

Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two "lift" pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in §112.1(b) in case there is an equipment failure or human error at the facility – 112.8(b)(5): Not applicable to the Hardin County Wind Project.

6 Bulk Storage Containers, 40 CFR § 112.8(c) & 40 CFR § 112.12(c)

6.1 Containers Compatible with the Material Stored [40 CFR § 112.8(c)(1) & § 112.12(c)(1)]

Do not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature – 112.8(c)(1): All tanks and storage containers on-site were constructed and are used in accordance with applicable industry standards and the implied intent of the manufacturers. All containers are fully compatible with the material they hold and the environmental conditions to which they can be reasonably expected to be subjected. None of the bulk storage tanks are used to store oil at greater than atmospheric pressure.

6.2 Tanks Have Adequate Secondary Containment [40 CFR § 112.8(c)(2) & § 112.12(c)(2)]

Construct all bulk storage tank installations (except mobile refuelers and other nontransportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond – 112.8(c)(2): The off-road diesel tank, on-road diesel tank, and unleaded fuel tank are each kept within a round steel containment basin with a height of 2-feet (capacity of 3,000-gallons each). The tank storage area is also surrounded by concrete deadmen and lined with a plastic membrane. A spill pan or pail is utilized for secondary containment during transfer operations. The containment devices are sufficiently impervious to contain discharged petroleum product. The secondary containment measure provided for each oil storage container is described in **Table 1, Inventory of Oil Storage Containers and Oil-Filled Equipment**.

6.3 Storm Water Drainage [40 CFR § 112.8(c)(3) & § 112.12(c)(3)]

Do not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you – 112.8(c)(3):

(i) Normally keep the bypass valve sealed closed

(ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b).

(iii) Open the bypass valve and reseal it following drainage under responsible supervision

(iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §122.41(j)(2) and §122.41(m)(3) of this chapter.

Due to the site's natural topography, stormwater will drain toward the Scioto River, Cottonwood Ditch, or associated unnamed tributaries. Stormwater flow directions are depicted for each wind turbine in the Project's Construction Stormwater Prevention Plan (SWPPP). The secondary containment structures are not equipped with manually-operated valves for discharging precipitation; therefore, stormwater that collects in secondary containment is typically allowed to evaporate. Water that is discharged from secondary containment structures is visually inspected prior to release to determine if oil sheen or other indication of a regulated substance is present in discernable quantities.

These visual inspections are documented on the Containment Drainage Record Form in **Appendix E**. If an oil sheen is observed, the oil shall be removed by vacuum truck, oil absorbent pads, or other equivalent method. Recovered oil and oil-saturated materials are recycled or disposed of in accordance with federal, state, and local regulations. Discharge of water from containment areas is only performed by personnel who have received proper instructions and are otherwise qualified to determine whether or not the water is of sufficient quality to be released. Stormwater Discharge Logs must be completed each time secondary containment structures are dewatered, and these records must be retained for three (3) years.

6.4 Buried or Partially Buried Metallic Storage Tanks [40 CFR § 112.8(c)(4 & 5) & § 112.12(c)(4 & 5)]

Protect any completely buried metallic storage tank installed on or after January 10, 1974, from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks – 112.8(c)(4): Not applicable; there are no buried or partially buried storage tanks at the Hardin County Wind Project.

Do not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions – 112.8(c)(5): Not applicable; there are no partially buried or bunkered storage tanks at the Hardin County Wind Project.

6.5 Integrity Testing [40 CFR § 112.8(c)(6) & § 112.12(c)(6)]

Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shopbuilt, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph – 112.8(c)(6): As discussed in

Section 1.7, tanks, including supports and foundations, undergo daily visual inspections and monthly formal inspections to detect leaks, corrosion, pitting, cracking, and deterioration of foundation/supports.

Oil storage tank integrity testing is conducted in accordance with STI SP001 Standards. Due to the size of the tanks located at the Hardin County Wind Project, only monthly formal visual inspections are required. External tank inspections are performed to assess tank integrity, and deficiencies are noted and reported to the facility management. The visual inspection includes, but it not limited to, the following items:

- evidence of leaks or spills
- shell distortions
- corrosion deterioration (for non-insulated tanks)
- condition of foundation
- paint coating condition
- secondary containment structures
- inoperable or malfunctioning appurtenances (valves, piping, pumps)

For tanks subject only to visual integrity testing, facility personnel who have received training regarding this SPCC Plan, as called for in **Section 1.8**, are deemed to be qualified to perform inspections. Inspections are documented on the Monthly Tank Inspection Log, contained in **Appendix D**. All records are kept with Hardin County Wind Project's records for a minimum of three (3) years.

6.6 Internal Coils [40 CFR § 112.8(c)(7) & § 112.12(c)(7)]

Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system – 112.8(c)(7): Not applicable; internal heating coils are not used at the Hardin County Wind Project.

6.7 Engineered Discharge Prevention [40 CFR § 112.8(c)(8) & § 112.12 (c)(8)]

Engineer or update each container installation in accordance with good engineering practice to avoid discharges. Provide at least one of the following devices – 112.8(c)(8):

Used by Facility:

Yes	No	
☐	☒	High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller plants, an audible air vent may suffice.

☐	☒	High liquid level pump cutoff devices set to stop flow at predetermined tank content level
☐	☒	Direct audible or code signal communication between the container gauger and the pumping station
☒	☐	A fast response system for determining the liquid level of each bulk storage tank such as digital computers, telepulse, or direct vision gauges. If this alternative is used, a person must be present to monitor gauges and the overall filling of bulk storage containers.
☐	☒	Regularly test liquid level sensing devices to ensure proper operation.

Direct read gauges are used to visually check the tank's level prior to and during filling operations to satisfy the requirements of 40 CFR § 112.8(c)(8) and to prevent the overfilling of the tank. In addition, the possibility of a significant discharge is reduced by implementation of the following equipment and procedure:

- manual control over and physical presence of trained employees during all oil transfers
- regular inspections of tanks and auxiliary equipment
- training regarding oil-handling procedures

6.8 Facility Effluent [40 CFR § 112.8(c)(9) & § 112.12(c)(9)]

Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in 40 CFR Part 112.1(b) – 112.8(c)(9): Not applicable; the Hardin County Wind Project does not have authorized discharge points for effluent.

6.9 Oil Leaks Promptly Corrected [40 CFR § 112.8(c)(10) & § 112.12(c)(10)]

Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulation of oil in diked areas – 112.8(c)(10): Storage tanks and all ancillary equipment are visually inspected daily on facility-manned workdays and formally inspected monthly. Potential structural failures, housekeeping problems, and general tank conditions resulting in a loss of contents will be promptly corrected. If a significant oil discharge is discovered, the oil will be cleaned up using absorbents, and the source of the leak will be corrected immediately. Any accumulation of visible discharge will be promptly removed. If, by regular inspections or otherwise, it is determined that the integrity of the containers or auxiliary equipment is or may have been compromised, the system shall immediately be taken out of service, the problem evaluated, and appropriate steps taken to correct all deficiencies.

6.10 Mobile and Portable Oil Storage Containers [40 CFR § 112.8(c)(11) & § 112.12(c)(11)]

Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers and other non-transportation-related tank trucks, you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation - 112.8(c)(11): Any portable oil storage containers, such as 55-gallon drums, are stored on spill pallets in the laydown area. Additional mobile or portable containers may be brought on-site as a result of spill clean-up or equipment maintenance. Spent absorbent materials and booms are placed in drums and disposed of in accordance with local, state, and federal regulations.

7 Facility Transfer Operations, 40 CFR § 112.8(d) & 40 CFR § 112.12(d)

The receipt and dispensing of oil is conducted with equipment and completed with procedures common to the petroleum and construction industries.

7.1 Buried Piping Protected and When Exposed, Inspected [40 CFR § 112.8(d)(1) & § 112.12(d)(1)]

Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage – 112.8(d)(1): Not applicable; no underground piping is present at the Hardin County Wind Project. As a result, cathodic protection is unnecessary.

7.2 Out-of-Service Pipes Capped/Blank Flanged [40 CFR § 112.8(d)(2) & § 112.12(d)(2)]

Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time – 112.8(d)(2): Not applicable; the Hardin County Wind Project is not equipped with terminal connection transfer points.

7.3 Aboveground Pipe Supports [40 CFR § 112.8(d)(3) & § 112.12(d)(3)]

Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction – 112.8(d)(3): Not applicable; no permanent piping will be constructed at the Hardin County Wind Project.

7.4 Testing/Inspection Aboveground Valves and Pipe [40 CFR § 112.8(d)(4) & § 112.12(d)(4)]

Regularly inspect all aboveground valves, piping, and appurtenances. The inspection must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Integrity and leak testing of buried piping must also be conducted at the time of installation, modification, construction, relocation, or replacement – 112.8(d)(4): Product transfer lines and valves are routinely inspected for visible signs or leakage by facility personnel. If evidence of any product is found, it will immediately be brought to the attention of the Site Manager, who will, in turn, notify the appropriate persons in the chain of command for corrective action.

All aboveground equipment is observed during daily routine activities and formally inspected monthly. Operators are instructed to observe any unusual conditions and to check for leaks, coating failures, loose insulation, unusual noises, hard to operate manual equipment, or any other signs of potential failure. Employees make repairs as soon as practicable. Potential structural failures, housekeeping problems, and general tank conditions are noted, and problems are promptly corrected. Inspection forms are included in **Appendix D, Monthly Tank Inspection Logs** and are kept on file for a minimum of three (3) years.

7.5 Drivers are Warned of Aboveground Piping [40 CFR § 112.8(d)(5) & § 112.12(d)(5)]

Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations – 112.8(d)(5): Where vehicles entering the site may endanger transfer operations, drivers are warned through the use of signs, placards, or traffic cones. Facility personnel, drivers, and contractors are trained regarding contents of this SPCC Plan, including awareness of the location of transfer operations, to minimize the potential for a spill.

8 SPCC Plan Maintenance, 40 CFR § 112.5

8.1 Plan Review and Amendments [40 CFR § 112.5]

This SPCC Plan is amended whenever there is a modification in facility design, construction, storage capacity, operation, or maintenance, which renders this SPCC Plan inadequate. Title 40 of the CFR Part 112.5(c) states, "Except as provided in §112.6, have a Professional Engineer certify any technical amendments to your Plan in accordance with §112.3(d)." Therefore, the amendment is prepared prior to or concurrent with the facility modification, and is certified as required. **Appendix F** contains record of plan review, amendment requirements, and changes to the SPCC Plan.

8.2 Plan Annual Review [40 CFR § 112.5]

This SPCC Plan is reviewed once per year internally as described in **Appendix G, Internal Annual Review**. **Appendix G** also includes the annual internal certification.

Tables

Table 1: Inventory of Oil Storage Containers and Oil-Filled Equipment
Table 2: Emergency Notification Phone List
Table 3: 40 CFR § 112 Appendix G Cross Reference to this SPCC Plan

Table 1 Inventory of Oil Storage Containers and Oil-Filled Equipment

Contents	Maximum Tank Capacity (gallons)	Tank Type	Secondary Containment
Oil Storage Containers			
On-Road Diesel	500	Storage Tank	• round steel containment basin with a wall height of 2-feet • the combined tank area is surrounded by concrete deadmen and lined with a plastic membrane
Off-Road Diesel	500	Storage Tank	• round steel containment basin with a wall height of 2-feet • the combined tank area is surrounded by concrete deadmen and lined with a plastic membrane
Unleaded Fuel	500	Storage Tank	• round steel containment basin with a wall height of 2-feet • the combined tank area is surrounded by concrete deadmen and lined with a plastic membrane
Mobile Oil-Filled Equipment			
No mobile refuelers will be used during construction of the Hardin County Wind Project.			
Mobile equipment (e.g., bulldozers, loaders, dump trucks) will be used during construction of the Hard County Wind Project but are not subject to SPCC Rules. However, it is recommended that the spill response procedures in Section 1.3 in the event of a leak or spill.			
Other Oil-Filled Equipment			
No other oil-filled equipment will be used during construction of the Hardin County Wind Project.			

Table 2 Emergency Notification Phone List

Contact	Primary Phone Number	Mobile or Alternative Phone Number
IN THE EVENT OF A RELEASE, NOTIFY IMMEDIATELY IN THE ORDER SHOWN BELOW:		
Hardin County Wind Project Response Team		
John Roberts Site Manager	(410) 703-7522	(575) 742-6781
Additional Response Team Members from the contractor will be added at a later date.		
Federal, State, and Local Agencies		
Fire/Police/Local Ambulance	911	
National Response Center (NRC)	1-800-424-8802	
Ohio EPA 24-hour Emergency Spill Hotline	1-800-282-9378	
U.S. EPA, Region 5	1-800-621-8431	

Table 3 40 CFR § 112 Appendix G Cross Reference to this SPCC Plan

Applicable Reference to 40 CFR § 112	Appendix G to Part 112—Tier I Qualified Facility SPCC Plan Template Heading	Section in this SPCC Plan
N/A	Facility Description	Section 1.2: Facility Description [40 CFR § 112.7(a)(3)]
40 CFR §112.6(a)(1)	I. Self-Certification Statement	Appendix C: Self-Certification and Management Plan Review
40 CFR §112.5(b)	II. Record of Plan Review and Amendments – Five Year Review	Appendix F: Plan Review, Amendment Requirements, and Change Tracking
40 CFR §112.7(a)(3)(i)	III. Plan Requirements 1. Oil Storage Containers	Table 1: Inventory of Oil Storage Containers and Oil-Filled Equipment
40 CFR §112.6(a)(3)(i) and (ii), §112.7(c), and §112.9(c)(2)	III. Plan Requirements 2. Secondary Containment and Oil Spill Control	Section 1.5: Spill Containment [40 CFR § 112.7(c)] Table 1: Inventory of Oil Storage Containers and Oil-Filled Equipment
40 CFR §112.7(e) and (f), §112.8(c)(6) and (d)(4), §112.9(c)(3), and §112.12(c)(6) and (d)(4)	III. Plan Requirements 3. Inspections, Testing, Recordkeeping and Personnel Training	Section 1.7: Inspections, Tests, and Records [40 CFR § 112.7(e)] Section1.8: Personnel Training and Discharge Prevention Procedures [40 CFR § 112.7(f)] Section 6.5: Integrity Testing [40 CFR § 112.8(c)(6) & § 112.12(c)(6)] Section 7.4: Testing/Inspection Aboveground Valves and Pipe [40 CFR § 112.8(d)(4) & § 112.12(d)(4)] Appendix B: Oil Discharge Prevention Training Outline and Spill Reporting Guidelines Appendix D: Monthly Tank Inspection Log Table 2: Emergency Notification Phone List
40 CFR §112.7(g)	III. Plan Requirements 4. Security (excluding oil production facilities)	Section 2: Security, 40 CFR § 112.7(g)
40 CFR §112.7(a)(3)(iv) and §112.7(a)(5)	III. Plan Requirements 5. Emergency Procedures and Notifications	Section 1.2: Facility Description [40 CFR § 112.7(a)(3)] Section 1.3: Response Plan [40 CFR § 112.7(a)(4 & 5)] Table 2: Emergency Notification Phone List
40 CFR §112.7(a)(3)(vi)	III. Plan Requirements 6. Contact List	Section 1.2: Facility Description [40 CFR § 112.7(a)(3)] Table 2: Emergency Notification Phone List

Applicable Reference to 40 CFR § 112	Appendix G to Part 112—Tier I Qualified Facility SPCC Plan Template Heading	Section in this SPCC Plan
40 CFR §112.7(a)(4) and (a)(5)	III. Plan Requirements 7. NRC Notification Procedure	Section 1.3: Response Plan [40 CFR § 112.7(a)(4 & 5)] Table 2: Emergency Notification Phone List
40 CFR §112.4	III. Plan Requirements 8. SPCC Spill Reporting Requirements (Report within 60 days)	Section 1.3: Response Plan [40 CFR § 112.7(a)(4 & 5)] Table 2: Emergency Notification Phone List
A. Onshore Facilities (excluding production) §§112.8(b) through (d), 112.12(b) through (d)		
40 CFR §112.8(b)(1) and §112.12(b)(1)	Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged.	Section 5.2: Drainage from the Diked Areas [40 CFR § 112.8(b)(1 & 2) & § 112.12(b)(1 & 2)]
40 CFR §112.8(b)(2) and §112.12(b)(2)	Valves of manual, open-and-closed design are used for the drainage of diked areas.	Section 5.2: Drainage from the Diked Areas [40 CFR § 112.8(b)(1 & 2) & § 112.12(b)(1 & 2)]
40 CFR §112.8(c)(1) and §112.12(c)(1)	The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature.	Section 6.1: Containers Compatible with the Material Stored [40 CFR § 112.8(c)(1) & § 112.12(c)(1)]
40 CFR §112.6(a)(3)(ii)	Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b).	Section 1.5: Spill Containment [40 CFR § 112.7(c)] Table 1: Inventory of Oil Storage Containers and Oil-Filled Equipment
40 CFR §112.8(c)(3) and §112.12(c)(3)	If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: • Bypass valve is normally sealed closed • Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines • Bypass valve is opened and resealed under responsible supervision • Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3]	Section 6.3: Storm Water Drainage [40 CFR § 112.8(c)(3) & § 112.12(c)(3)] Appendix E: Containment Drainage Record Form

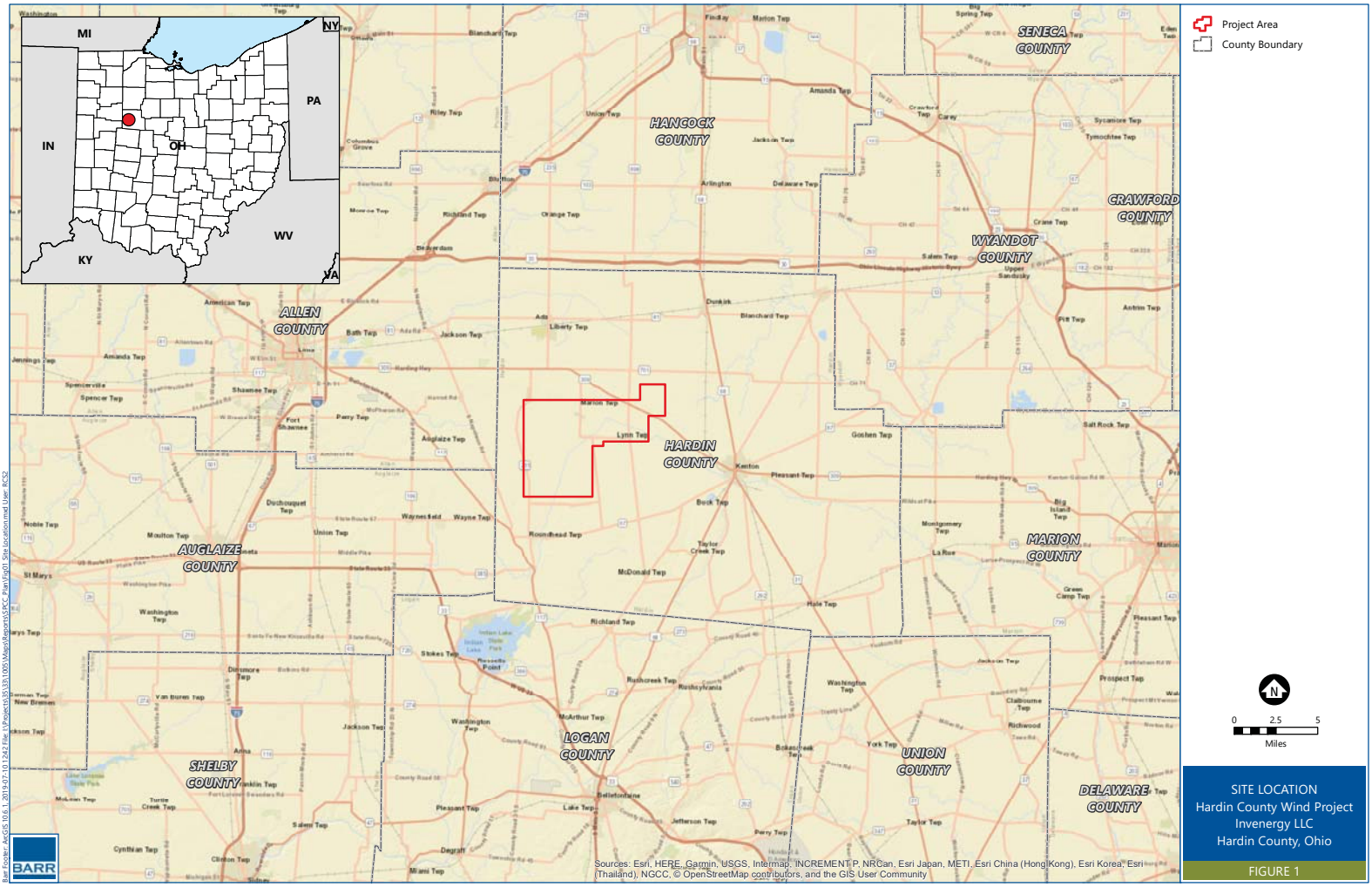
Applicable Reference to 40 CFR § 112	Appendix G to Part 112—Tier I Qualified Facility SPCC Plan Template Heading	Section in this SPCC Plan
40 CFR §112.8(c)(4) and §112.12(c)(4)	For completely buried metallic tanks installed on or after January 10, 1974 at this facility: • Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions. • Regular leak testing is conducted.	Section 6.4: Buried or Partially Buried Metallic Storage Tanks [40 CFR § 112.8(c)(4 & 5) & § 112.12(c)(4 & 5)]
40 CFR §112.8(c)(5) and §112.12(c)(5)	For partially buried or bunkered metallic tanks: • Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	Section 6.4: Buried or Partially Buried Metallic Storage Tanks [40 CFR § 112.8(c)(4 & 5) & § 112.12(c)(4 & 5)]
40 CFR §112.8(c)(6) and §112.12(c)(6)(i)	Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]	Section 6.5: Integrity Testing [40 CFR § 112.8(c)(6) & § 112.12(c)(6)] Appendix D: Monthly Tank Inspection Log
40 CFR §112.8(c)(6) and §112.12(c)(6)	Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. [See Inspection Log and Schedule in Attachment 3.1]	Section 6.5: Integrity Testing [40 CFR § 112.8(c)(6) & § 112.12(c)(6)] Appendix D: Monthly Tank Inspection Log
40 CFR §112.12(c)(6)(ii)	For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]	Section 6.5: Integrity Testing [40 CFR § 112.8(c)(6) & § 112.12(c)(6)] Appendix D: Monthly Tank Inspection Log
N/A	Each container is provided with a system or documented procedure to prevent overfills for the container.	Section 6.7: Engineered Discharge Prevention [40 CFR § 112.8(c)(8) & § 112.12 (c)(8)]

Applicable Reference to 40 CFR § 112	Appendix G to Part 112—Tier I Qualified Facility SPCC Plan Template Heading	Section in this SPCC Plan
40 CFR §112.6(a)(3)(iii)	Liquid level sensing devices are regularly tested to ensure proper operation [See Inspection Log and Schedule in Attachment 3.1].	Section 6.7: Engineered Discharge Prevention [40 CFR § 112.8(c)(8) & § 112.12 (c)(8)] Appendix D: Monthly Tank Inspection Log
40 CFR §112.8(c)(10) and §112.12(c)(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed.	Section 6.9: Oil Leaks Promptly Corrected [40 CFR § 112.8(c)(10) & § 112.12(c)(10)]
40 CFR §112.8(d)(4) and §112.12(d)(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. [See Inspection Log and Schedule in Attachment 3.1]	Section 7.4Testing/Inspection Aboveground Valves and Pipe [40 CFR § 112.8(d)(4) & § 112.12(d)(4)] Appendix D: Monthly Tank Inspection Log
40 CFR §112.8(d)(4) and §112.12(d)(4)	Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. [See Inspection Log and Schedule in Attachment 3.1]	Section 7.4: Testing/Inspection Aboveground Valves and Pipe [40 CFR § 112.8(d)(4) & § 112.12(d)(4)] Appendix D: Monthly Tank Inspection Log
N/A	Attachment 1.1: Five Year Review Log	Appendix F: Plan Review, Amendment Requirements, and Change Tracking
N/A	Attachment 1.2: Technical Amendment Log	Appendix F: Plan Review, Amendment Requirements, and Change Tracking
N/A	Attachment 2: Oil Spill Contingency Plan and Checklist	Section 1.3: Response Plan [40 CFR § 112.7(a)(4 & 5)] Table 2: Emergency Notification Phone List Appendix B: Oil Discharge Prevention Training Outline and Spill Reporting Guidelines
N/A	Attachment 3.1: Inspection Log and Schedule	Section 1.7: Inspections, Tests, and Records [40 CFR § 112.7(e)] Section 6.5: Integrity Testing [40 CFR § 112.8(c)(6) & § 112.12(c)(6)] Section 7.4: Testing/Inspection Aboveground Valves and Pipe [40 CFR § 112.8(d)(4) & § 112.12(d)(4)] Appendix D: Monthly Tank Inspection Log

Applicable Reference to 40 CFR § 112	Appendix G to Part 112—Tier I Qualified Facility SPCC Plan Template Heading	Section in this SPCC Plan
N/A	Attachment 3.2: Bulk Storage Container Inspection Schedule – onshore facilities (excluding production)	Section 1.7: Inspections, Tests, and Records [40 CFR § 112.7(e)] Section 6.5: Integrity Testing [40 CFR § 112.8(c)(6) & § 112.12(c)(6)] Section 7.4: Testing/Inspection Aboveground Valves and Pipe [40 CFR § 112.8(d)(4) & § 112.12(d)(4)] Appendix D: Monthly Tank Inspection Log
N/A	Attachment 3.3: Dike Drainage Log	Appendix E: Containment Drainage Record Form
N/A	Attachment 3.4: Oil-handling Personnel Training and Briefing Log	Appendix B: Oil Discharge Prevention Training Outline and Spill Reporting Guidelines
N/A	Attachment 4: Discharge Notification Form	Section 1.3: Response Plan [40 CFR § 112.7(a)(4 & 5)] Table 2: Emergency Notification Phone List Appendix B: Oil Discharge Prevention Training Outline and Spill Reporting Guidelines

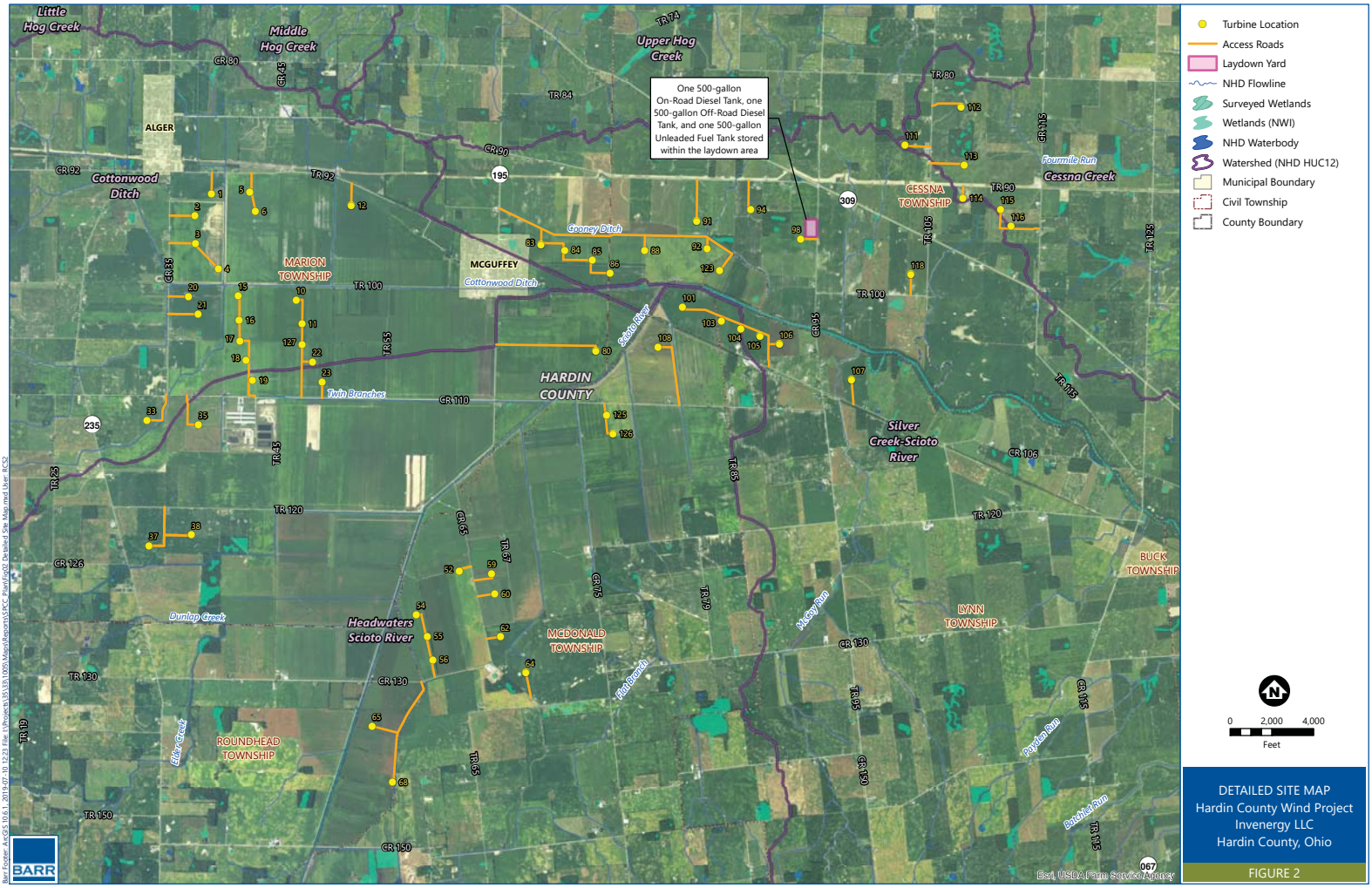
Figures

Figure 1: Site Location
Figure 2: Detailed Site Map



SITE LOCATION
Hardin County Wind Project
Invenergy LLC
Hardin County, Ohio

FIGURE 1



DETAILED SITE MAP
Hardin County Wind Project
Invenergy LLC
Hardin County, Ohio

FIGURE 2

Appendices

Appendix A: Certification of the Applicability of Substantial Harm Criteria
Appendix B: Oil Discharge Prevention Training Outline and Spill Reporting Guidelines
Appendix C: Self-Certification and Management Plan Review
Appendix D: Monthly Tank Inspection Logs
Appendix E: Containment Drainage Record Form
Appendix F: Plan Review, Amendment Requirements, and Change Tracking
Appendix G: Internal Annual Review

Appendix A

Certification of the Applicability of Substantial Harm Criteria

Certification of the Applicability of Substantial Harm Criteria

Facility Name: Invenergy LLC – Hardin County Wind Project

Facility Address: South of the town of McGuffey, Hardin County, Ohio

1. 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?
   Yes_____ No ___X_____

2. 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?
   Yes_____ No____X_____

3. 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 Attachment C-iii to this appendix or a comparable formula (1)) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.
   Yes_____ No____X_____

4. 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 to Attachment C-III to this appendix or a comparable formula (1)) such that a discharge from the facility would shut down a public drinking water intake (2)?
   Yes_____ No____X_____

5. 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?
   Yes_____ No____X_____

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 _____

Name (please type or print): _____

Title: _____

Date: _____

Appendix B

Oil Discharge Prevention Training Outline and Spill Reporting Guidelines

Oil Discharge Prevention Training Outline

Facility Name: Invenergy LLC – Hardin County Wind Project

Facility Location: South of the town of McGuffey, Hardin County, Ohio

Training programs are conducted annually for all facility personnel who handle or dispense oil products as part of their job. This training is also given to new facility personnel who are responsible for handling or dispensing oil products. Discharge prevention briefings for oil-handling personnel are scheduled at least once each year to assure adequate understanding of the SPCC Plan. Training consists of review of the following topics:

- SPCC Plan provisions.
- Oil discharge prevention and spill response.
- Spill reporting procedures.
- Operation and maintenance of equipment to prevent discharges of oil.
- Emergency response personnel.
- Applicable pollution control laws, rules, and regulations.
- Changes in regulatory requirements.
- Previous spill history (if any).
- Changes in facility operation that may affect the SPCC Plan.
- Review of any failures or malfunctioning components 112.7 (f)(3).
- Recently developed spill prevention measures.
- Proper use of personal protective equipment.
- Location and proper use of spill response equipment.

Release Reporting of a Hazardous Substance

The State Emergency Response Commission (SERC) finalized a set of eight (8) release reporting rules (3750-25-01; 3750-25-05; 3750-25-10; 3750-25-12; 3750-25-13; 3750-25-15; 3750-25-20; and 3750-25-25), effective June 30, 1993. The purpose of this section is to make you aware of your reporting obligations in case of a discharge or release.

All verbal notifications made under these rules are to be reported to the Ohio EPA's Emergency Response Section, Local Emergency Planning District which may be affected, and the jurisdictional fire department.

An owner or operator is required to report a release or discharge under 3750.06 of the Ohio Revised Code anytime there is a release or spill of a regulated chemical which exceeds its assigned Reportable Quantity (RQ) and leaves the facility property line. The regulated substances subject to the release reporting requirements are referenced below.

Materials Subject to Release Reporting

- Extremely Hazardous Substances 40 CFR; Part 355; Appendix A and B,
- CERCLA Hazardous Substances 40 CFR Part 302; Table 302.4, and
- Oil (definition includes without limitation to, gasoline, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil).
- The Reportable Quantity (RQ) for the discharge of oil including crude oil into or upon navigable waters is an amount which causes a visible film or sheen upon the surface of the water.
- The RQ for the release of oil into the environment, excluding navigable waters, is an amount of 25 gallons or more.
- The RQ for the release of crude oil from an oil and gas extraction storage facility into the environment, excluding navigable waters, is 210 gallons.

Verbal Notification Requirement

The verbal notification to the fire department, LEPC, and Ohio EPA shall be made within 30 minutes of knowledge of the release, unless notification within that timeframe is impractical due to uncertain circumstances.

Effective Aug. 9, 2016, oil and gas regulated sites under ORC Chapter 1509 shall make the verbal notification within 30 minutes of knowledge of the release to Ohio Department of Natural Resources (ODNR) at 1-844-OHCALL1, LEPC and jurisdictional fire department.

In addition, calls to the National Response Center (NRC) shall be made for those reportable quantity releases involving CERCLA hazardous substances or oil to navigable waters as soon as possible. **The National Response Center (NRC) 24-hour number is 1-800-424-8802**.

Be prepared to relay as much of the information listed below as is known or can be estimated at the time of reporting. Please remember this is an initial report and estimates can be corrected in your follow-up emergency notice report.

- Name and phone number of the person to contact for further information.
- Location and source of the release or discharge.

The release notification for 24-hour reporting of spills in the State of Ohio is:

In Ohio call: 1-800-282-9378
If the 1-800 number does not work, call: (614) 224-0946

Oil and Gas release notification
1-844-OHCALL1

In addition, facility must call:

- LEPC emergency coordinator
- Jurisdictional fire department

- Chemical name or identity of any substance involved in the release or discharge.
- Is the substance an extremely hazardous substance?
- Estimate of the quantity (gallons or pounds) discharged into the environment.
- Time and duration of the release or discharge.
- The environmental medium or media into which the substance was released or discharged.
- Potential health effects associated with the release or discharge of the substance.
- Report precautions taken, including evacuation, remediation, or other proposed response actions.

This information is required under ORC Section 3750.06(C) and Rule 3750-25-25(A)(1) of the Ohio Administrative Code (OAC).

Written Follow-up Requirements

After the spill, release or discharge, written follow-up emergency notice must be submitted within 30 days to the Ohio EPA Emergency Response Section and the local planning committee of the planning district in which the release or discharge occurred, unless the release was from a vessel, and then the report is sent only to the SERC. This follow-up emergency notice is your company's opportunity to explain in its own words the circumstances and actions relating to the release of pollutants to the environment. Your written emergency notice should follow the question sequence as indicated below. If any of the questions are not applicable to your incident, indicate N/A (not applicable) for that item.

Effective Aug. 9, 2016, oil and gas regulated sites under ORC Chapter 1509 must submit the written follow-up report within 30 days to the Chief of the Division of Oil and Gas Resources Management with ODNR and the LEPC.

1. Who

- Complete facility name, address and telephone number of the facility from which the release occurred. Complete name of owner and/or operator.

2. When

- Actual time, date, and duration of the discharge or release.
- Actual time and date of discovery of the release or discharge.
- Actions taken to respond to and contain the release or discharge.
- Indicate the spill number assigned by Ohio EPA. (If you do not know this number, call a duty officer during business-hours and ask. The telephone number is (614) 644-3194). If the National Response Center was notified, please provide their assigned case number.

3. Location

- Location of facility from which the release or discharge occurred.
- Location of release: county, township, and city.
- Longitude and latitude of the release, if known.
- Distance and direction from nearest intersection or milepost if it was a transportation-related release or discharge.

4. Product Release

- Common and/or technical name of the material released or discharged and CAS Numbers.
- What was the quantity and duration of the discharge? Indicate volume in gallons or pounds.

5. Environmental Impact

- Name of the environmental medium or media affected (i.e. navigable waters, land, and/or air). If navigable waters, please identify.
- What was the length of area of the navigable waterway affected?
- What was the ground surface area (square feet or yards) and depth of soil contamination?
- To the extent information is available; identify damage to wildlife and/or vegetation.
- To the extent information is available; identify impact to human health and safety (i.e. evacuations, exposure, etc.)
- Where appropriate, identify medical advice provided for exposed individuals and or local medical personnel.

6. Monitoring and Detection

- If the release or discharge was monitored, indicate the method of detection and concentrations detected.
- If the release was air-borne, how was the wind direction and speed determined?
- Was the public warned, and if so, how?

7. Mitigation, Containment Action

- How much product or waste was recovered or neutralized?
- How was the material recovered or neutralized?
- Were any other actions taken to reduce the impact of the discharge (containment, adsorbents, on-site treatment, etc.)?

8. Prevention Measures

- Please provide plans to prevent recurrence of the discharge or release which may occur at this specific source. This may include: employee training, replacement of equipment, construction, or security measures such as lighting, fencing or locks.

9. Health Risks

- List known or anticipated acute and chronic health risks of exposure associated with the substances which were released.

10. Permit Numbers

- Indicate any air, water, or other permit numbers which may be pertinent to this incident (voluntary information).
- If this is a NPDES/air permit, please enclose a copy of your current effluent/emission limitations.

11. Chronology

- Provide a chronological review of the incident. Include a chronology of communications with state and local government.

12. Documentation

- Provide any reports or other documents which pertain to the incident (e.g. accident reports, manifest, bills of lading, and laboratory analyses).

13. Causes

- Describe any extenuating circumstances which caused the discharge.

14. Economic Impact

(This information is voluntary)

- Estimate the dollar value, if any, of the spilled product.
- What was the equipment damage cost (estimate)?
- What was the cost of spill cleanup (estimate)?
- What are the estimated costs of spill prevention to eliminate possible reoccurrence of this event?

This information is required pursuant to ORC Section 3750.06(D) and OAC Rule 3750-25-25(A) (2).

The statute provides that if significant additional information regarding the mandatory or voluntary information submitted becomes known during the period between submission of the written report and one (1) year after the release or discharge, the owner or operator shall submit to the LEPC and the Ohio EPA an updated written notice within three (3) days after learning of the additional information.

If this is the second oil spill release at this location within a 12-month period, or a release of over 1,000 gallons which has reached water, then you must submit a copy of your Spill Prevention Control and Counter-measure Plan (SPCC) to the U.S. EPA Regional Administrator and to Ohio EPA within 60 days from the time of the discharge as required by 40 CFR 112.4. Your SPCC plan may be submitted with your response to the 30-day written follow-up report. You may obtain SPCC information from U.S. EPA, by contacting their Hotline Center at 800-424-9346.

The written emergency notice must be submitted within 30 days of the spill, release or discharge to:

Ohio EPA — DAPC/SERC
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Note: the 30-day written spill/release notice to the Ohio EPA can be submitted by attaching the report and emailing to: ***SERCspillreport@epa.ohio.gov***.

Please reference the Ohio EPA, Emergency Response spill number on the email subject line.

Listings for County LEPC coordinators by county may be found on pages 23-36 of this manual.

Appendix C

Self-Certification and Management Plan Review

Invenergy LLC – Hardin County Wind Project

40 CFR § 112.6 (a)

Self-Certification Document

Facility Name: Hardin County Wind Project

Owner Name: Invenergy LLC

Facility Location: South of the town of McGuffey, Hardin County, Ohio

Self-Certification:

Per 40 CFR §112.6 (a), I hereby certify that I, or my agent, have examined the facility and, being familiar with the provisions of 40 CFR §112, attest that this SPCC Plan has been prepared in accordance accepted and sound industry practices and standards, and with the requirements of 40 CFR §112. I certify that the Plan is adequate for this facility and that procedures for the required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices. I certify that the facility meets the qualification criteria in 40 CFR §112.3(g)(1) and that this SPCC Plan does not deviate from any requirement as allowed by §112.7(a)(2) and 112.7(d) or include measures pursuant to §112.9(c)(6) for produced water containers and any associated piping. Finally, I certify that this Plan has the approval of management at a level to commit necessary resources to fully implement.

Invenergy LLC

Name: _____

Signature: _____

Date: _____

Invenergy LLC – Hardin County Wind Project

40 CFR § 112.3 (d) [Management Approval]

Certification Document

Facility Name: Hardin County Wind Project

Owner Name: Invenergy LLC

Facility Location: South of the town of McGuffey, Hardin County, Ohio

Management Certification:

This document is a carefully thought out plan, prepared in accordance with good engineering practices, and which has full approval of Invenergy LLC management at a level to commit necessary resources to carry it out. This document is referred to as the Hardin County Wind Project Spill Prevention, Control, and Countermeasure (SPCC) Plan and is intended to minimize the potential to adversely impact the environment and to attain and maintain compliance with 40 CFR § 112.

Invenergy LLC

Name: _____

Title: _____

Signature: _____

Date: _____

Appendix D

Monthly Tank Inspection Log

Monthly Tank Inspection Log

Facility Name: Invenergy LLC – Hardin County Wind Project

Facility Location: South of the town of McGuffey, Hardin County, Ohio

Monthly inspections include an evaluation of storage tank conditions (drip marks, discoloration, corrosion, cracks, dead vegetation, etc.), storage tank foundations (cracks, settling, damage from vegetation, etc.), piping (droplets, corrosion, material seepage, etc.), and secondary containment condition. Inspection records must be kept on file for a period of at least three (3) years.

Date:	
Inspector:	

Tank I.D. and Location	Tank / Container Condition (Corrosion, Deterioration, etc.)	Piping Condition (Leaks, Spills, etc.)	Actions Recommended
Oil Storage Containers			
Mobile Oil-Filled Equipment			
Other Oil-Filled Equipment			

Appendix E

Containment Drainage Record Form

Containment Drainage Record Form

Facility Name: Invenergy LLC – Hardin County Wind Project

Facility Location: South of the town of McGuffey, Hardin County, Ohio

This report must be completed when stormwater is drained from secondary containment structures. The report must be kept for a minimum of three (3) years.

Date:	
Inspector:	

1. Name of containment being drained:		
2. Approximate water depth:		inches
3. Does the storm water have an oil sheen on the surface? Note: **If the water has a sheen, do not drain!** Contact Environmental Department staff to make arrangements for proper disposal.	Yes	No
4. Was the drainage activity monitored?	Yes	No
5. Was the bypass valve closed after the drainage was complete?	Yes	No
6. Date of drainage:		
7. Time of drainage:		
8. Completed by:		
9. Comments:		

Appendix F

Plan Review, Amendment Requirements, and Change Tracking

SPCC Plan Review and Amendments [40 CFR § 112.5]

Section 40 CFR § 112.5 requires this SPCC Plan to be reviewed every five years. As a result of this review and evaluation, the owner or operator shall amend the SPCC Plan within six months of the review to include more effective prevention and control technology if:

- Such technology will significantly reduce the likelihood of a spill event from the facility.
- If such technology has been field-proven at the time of the review.

The owner or operator must also amend the plan when:

- There is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in Section 40 CFR § 112.1 (b).

No amendment to this SPCC Plan shall be effective to satisfy the requirements of 40 CFR § 112, unless it has been certified by a professional engineer in accordance with 40 CFR § 112.3 (d).

Review Certificate

I have reviewed this document and found it to be a carefully thought out plan, prepared in accordance with good engineering practices, and which has full approval of Invenergy LLC management at a level to commit the necessary resources to carry it out. This document is referred to as the Hardin County Wind Project Spill Prevention, Control, and Countermeasure (SPCC) Plan. This Plan is intended to minimize the potential to adversely impact the environment and to attain and maintain compliance with 40 CFR § 112.

Review in 2022

I have completed a review and evaluation of the SPCC plan for the facility on _____ and _____ (will/will not) amend the plan as a result.

Name:	Title:	Signature:

Review in 2027

I have completed a review and evaluation of the SPCC plan for the facility on _____ and _____ (will/will not) amend the plan as a result.

Name:	Title:	Signature:

Tracking Table for SPCC Plan Updates

Date of Plan Update	Description of Change(s)	Portion(s) of Plan Updated	Name of Person Completing the Update
July 2019	Original plan	All	Mary Krull, PE, Barr Engineering Co.

Appendix G

Internal Annual Review

Invenergy LLC performs an annual internal review of this SPCC Plan. As a result of this review and evaluation, and if required to do so, the owner or operator shall amend the SPCC Plan within six months. The following changes at the facility would require review and certification by a professional engineer:

- A change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in Section 40 CFR § 112.1 (b).
- A change in bulk oil storage containers, oil-filled equipment, or oil transfer areas or secondary containment.

Amendments to this SPCC Plan listed above shall not be effective to satisfy the requirements of 40 CFR § 112, unless they have been certified by a professional engineer in accordance with 40 CFR § 112.3 (d).

Updates to the SPCC Plan, including emergency contacts, spill notification list, or general text / format changes, do not require a professional engineer's review or certification.

Internal Annual Review in 2020

I have completed a review and evaluation of the SPCC plan for the facility on _____ and _____ (will/will not) amend the plan as a result.

Name:	Title:	Signature:

Internal Annual Review in 2021

I have completed a review and evaluation of the SPCC plan for the facility on _____ and _____ (will/will not) amend the plan as a result.

Name:	Title:	Signature:

Internal Annual Review in 2022

I have completed a review and evaluation of the SPCC plan for the facility on _____ and _____ (will/will not) amend the plan as a result.

Name:	Title:	Signature:

Internal Annual Review in 2023

I have completed a review and evaluation of the SPCC plan for the facility on _____ and _____ (will/will not) amend the plan as a result.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/12/2019 3:48:29 PM

in

Case No(s). 09-0479-EL-BGN, 11-3446-EL-BGA, 16-0469-EL-BGA, 16-2404-EL-BGA

Summary: Notification of Phase 3 – Compliance with Condition 54, Spill Prevention, Control, and Countermeasure Plan electronically filed by Christine M.T. Pirik on behalf of Hardin Wind Energy LLC