

September 16, 2022

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

Re: Case No. 20-931-EL-BGN

In the Matter of the Application of Fox Squirrel Solar, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Madison County, Ohio.

Case No. 21-1031-EL-BGA

In the Matter of the Application of Fox Squirrel Solar, LLC for a Boundary Amendment to it Certificate in Case No. 20-931-EL-BGN

Compliance with Condition 29 – Spill Prevention, Control, and Countermeasure Plan

Dear Ms. Troupe:

Fox Squirrel Solar, LLC (“Applicant”) is certified to construct a solar-powered electric generation facility in Madison County, Ohio, in accordance with the orders issued by the Ohio Power Siting Board (“OPSB”) in the above-referenced cases.

At this time, the Applicant is filing the attached Spill Prevention, Control, and Countermeasure Plan in compliance with Condition 29 of the OPSB’s July 15, 2021 Order in Case No. 20-931-EL-BGN. This information was provided to OPSB Staff on September 14, 2022.

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

Respectfully submitted,

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4862-9440-4659 [95732-2]

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN



Ulteig

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Fox Squirrel Solar Project

Prepared: July 28, 2022

Ulteig Project Number: 21.00649

Prepared for:

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INTRODUCTION

This Spill Prevention, Control, and Countermeasure (SPCC) Plan (Plan) establishes procedures and operating practices to prevent oil discharges from occurring, and prepares the facility to respond in a safe, effective, and timely manner to mitigate the impacts of discharges from the Fox Squirrel Solar Project (Project).

This Plan is also designed to serve as a reference for oil storage information and testing records, as a tool to communicate to employees and contractors' practices for preventing and responding to discharges, as a guide for conducting facility inspections, and as a resource during emergency responses. The Plan has been prepared to meet the requirements of Title 40, Code of Federal Regulations, Part 112 (40 CFR part 112). It has been determined that Fox Squirrel Solar does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in **Appendix B** of this Plan. As per 40 CFR 112, a copy of this Plan must be kept on-site and accessible during construction and must also be maintained in the office of the Facility Manager upon commencement of operations.

1.1 Self-Certified / PE Certified Requirements

Amendments in 2006 to the 40 CFR part 112 limits the quantity of petroleum a project can store and still be "self-certified" to 10,000 gallons. The Project is estimated to have 30,000 gallons of oil on-site. Due to this quantity of oil, a "self-certified" SPCC is not permitted by the Environmental Protection Agency (EPA), and a Professional Engineer (PE) Certified plan is required (Section 1.5). This Plan is intended to be utilized as a PE Certified plan for the Project and a PE has signed and sealed this Plan.

1.2 Qualified Oil-Filled Operational Equipment

Transformers may be considered "Qualified Oil-Filled Operational Equipment," as described in 40 CFR section 112.7(k), due to adherence to the description below from the EPA's *SPCC Guidance for Regional Inspectors* 2013 publication.

"The 2006 final rule amended §112.7 to provide an alternative option for facilities with qualified oil-filled operational equipment. Oil-filled operational equipment includes equipment with an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device.

'Qualified' oil-filled operational equipment are those that have had no discharges to navigable waters or adjoining shorelines in the three years prior to the SPCC Plan certification date (or since the facility became subject to 40 CFR part 112 if it has been in operation for less than three years), as described below

- *A single discharge greater than 1,000 U.S. gallons, or*
- *Two discharges as each greater than 42 U.S. gallons within any 12-month period."*

Due to the absence of secondary containment structures on all oil-filled operational equipment the following additions/alterations, found in subsequent sections, must be part of an SPCC Plan:

- The facility owner or operators shall establish and document procedures for inspections and monitoring of all equipment for the presence of leaks and spills of oil from the equipment (Section 3.7 of this SPCC).
- The development of an oil spill contingency plan (**Appendix E** of this SPCC).
- Provide a written commitment of workforce, equipment, and materials necessary to control and remove any oil discharges that may be harmful in an expeditious manner (Section 1.4 of this SPCC).

1.3 Scope of Plan

This Plan provides guidance on key actions that Blattner Energy, Inc. (Blattner), as the general contractor and SPCC coordinator, must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in **Appendix C**.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct employee training, as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document training on the log included in **Appendix D**.
- If either of the following occurs, submit this Plan to EPA Region 5 and the Ohio Environmental Protection Agency, along with other information as detailed in Section 5.4 of this Plan:
 - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or
 - The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.
- Amend the SPCC Plan within six months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a PE.
- Review the SPCC plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the SPCC plan review log of Section 1.7 of this Plan, but do not have to be certified by a PE.

1.4 Management Approval, Commitment of Resources, and Designated Person: §112.7

This facility is committed to preventing discharges of oil to navigable waters and the environment, and to maintain the highest standards for spill prevention control and countermeasures through the implementation and regular review and amendment to the Plan. This SPCC Plan for the Fox Squirrel Solar Project in Madison County, Ohio is fully supported by the management of Blattner. Blattner will implement this SPCC Plan and amend it as needed as a result of expansions, modifications, and improvements at the facility. In addition, the management of Blattner commits the workforce, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful and to respond to discharge within an appropriate response time.

The SPCC Plan Coordinator is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this SPCC plan.

Name: Carter Kasuske

Title:

Signature:

Date:

1.5 Professional Engineer Certification: §112.3(d)

I certify under penalty of law that this document and all attachments, as well as the facility they pertain to, were inspected and reviewed under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on the inquiry of the person or persons directly responsible for the gathering of information, the information submitted is, to the best of my knowledge and belief, truly accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Through this certification, I hereby attest that (1) I am familiar with the requirements of 40 CFR 112; (2) my personnel has visited and examined the facility; (3) the SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of the SPCC rule; (4) procedures for required inspections and testing have been established; and (5) the Plan is adequate for the facility.

Certifying Engineer:

State:

Registration Number:

Seal:

Signature:

Certification Date:

1.6 Location of SPCC Plan: §112.3(e)

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC will be maintained and kept in the on-site office trailer of Blattner on the Fox Squirrel Solar Project.

Normal hours of operations are from 6:00 AM to 6:00 PM Monday through Friday.

1.7 Plan Review / Amendments: §112.3 and §112.5

In accordance with 40 CFR 112.5 (a), Blattner shall periodically review and evaluate this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- Commissioning of equipment;
- Construction or demolition that might alter secondary containment structures; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to this SPCC Plan due to these types of changes shall be referred to as technical amendments and must be certified by a PE.

Nontechnical amendments do not need to be certified by a PE and can be done by the facility owner or operator. Nontechnical amendments include the following:

- Change in the name or contact information (e.g., telephone numbers) for individuals responsible for this SPCC Plan.
- Changes in the name or contact information of spill response or clean-up contractors.

Both technical and nontechnical amendments must be documented in the attached SPCC Review and Amendment Log (Table 1.7). All amendments to this SPCC Plan will be signed and certified by the owner/operator. Reviews must be recorded in the SPCC Review and Amendment Log even if no changes were made to the Plan.

This SPCC Plan is to be amended within six months of a change and implemented within six months following preparation of the amendment.

Table 1.7: SPCC Review and Amendments Log

Revision #	Date	Amendments / Revisions Made

Scheduled Reviews: §112.5(b)

Requirements of 40 CFR 112.5(b) state that reviews of the SPCC Plan must occur at least once every five years. Sound engineering and construction practices would encourage at least one plan review after the SPCC has been certified by a PE and after several inspections have occurred, to ensure the SPCC is applicable to the work beginning performed on-site.

1.8 Applicability / Cross-Reference with SPCC Provisions: §112.7

This SPCC Plan meets the requirements of 40 Code of Federal Regulations (CFR) Part 112 ("SPCC rule"). A cross-reference of the Plan to applicable parts of 40 CFR Part 112 is provided in Table 1.8.

The SPCC rule covers oil of any kind and form, including crude and refined petroleum products, asphalt, gasoline, fuel oil, mineral oil, naphtha, waste oil, and oil mixed with wastes/hazardous substances^{1 2}. The Project is required to prepare and implement an SPCC Plan when:

- Oil is stored above ground in bulk containers in total quantities in excess of 1,320 gallons
- The facility could reasonably be expected to discharge oil in harmful quantities into or upon "navigable water" of the United States

¹ The "List of Petroleum and Non-Petroleum Oils," compiled by the United States Coast Guard (USCG) may be useful in determining whether a substance is considered oil. The list is available on the USCG Web site at <http://www.uscg.mil/vrp/faq/oil.shtml>

² The "Table 116.4A - List of Hazardous Substances," compiled by the United States Environmental Protection Agency (U.S. EPA) shall be referred to when identifying all hazardous materials and wastes on-site. This list is available at <https://www.gpo.gov/fdsys/pkg/CFR-2015-title40-vol22/pdf/CFR-2015-title40-vol22-part116.pdf>
A list of reportable quantities of hazardous materials can be found at <https://www.gpo.gov/fdsys/pkg/CFR-2004-title40-vol26/pdf/CFR-2004-title40-vol26-sec302-4.pdf>

GENERAL FACILITY INFORMATION

2.1 Project / Site Location and Activities

Table 2.1: Project Name and Description

Project Name:	Fox Squirrel Solar
State:	Ohio
County:	Madison
Nearest Town:	Chrisman
Latitude:	39° 47' 09.55" N
Longitude:	83° 22' 54.56" W

The Fox Squirrel Solar Project is located approximately 3 miles southeast of Chrisman, Ohio, in the Oak Run Township of Madison County. The Project is owned by Blattner. The facility encompasses approximately 2,972 acres. When fully operational, the facility will be composed of a PV Solar array, Operations and Maintenance (O&M) Building, and an electrical substation containing a power transformer, switch gear, and other electrical equipment for collecting and distributing electricity generated on-site. The facility will generate up to 577 MWac/752.96 MWdc of electricity when fully operational. Solar sites contain electrical equipment such as transformers, voltage regulators, and circuit breakers for the purpose of transforming and controlling electrical current within the company's electric transmission and distribution systems. Transformers are filled with insulating mineral oil. Refer to **Appendix A** of this Plan for a more detailed description of the project location and layout.

This SPCC is intended to be used during the construction of the Fox Squirrel Solar Project. Construction is scheduled to begin on July 15, 2022, with completion by September 1, 2025.

2.2 Oil Storage and Handling

Table 2.2: Quantity of Oil Stored and Oil-Filled Operational Equipment

Container ID	Location	Contents	Quantity	Capacity (gallons each)	Potential Event	Oil Containment Measures
Inverter	Power Station	Mineral Oil	75	180	Lightning strikes, internal failures, and bushing failures	Gravel bed
Transformer	Power Station	Mineral Oil	75	660	Lightning strikes, internal failures, and bushing failures	Gravel bed
Transformer	Power Station	Mineral Oil	1	65	Lightning strikes, internal failures, and bushing failures	Gravel bed
Power Transformer	Substation	Mineral Oil	2	11993	Lightning strikes, internal failures, and bushing failures	Gravel bed
Capacitor Bank	Substation	Mineral Oil	2	67.5	Lightning strikes, internal failures, and bushing failures	Gravel bed
Mobile Generator	Site-wide	Mineral Oil	15	100	Rupture and filling spill	Gravel bed
Died Diesel Fuel Tank	Laydown Yard	Died Diesel	4	1000	Rupture and filling spill	Double Wall Tank
Died Diesel Fuel Tank	Batch Plant	Died Diesel	1	1000	Rupture and filling spill	Double Wall Tank
Clear Diesel Fuel Tank	Laydown Yard	Clear Diesel	3	1000	Rupture and filling spill	Double Wall Tank

Clear Diesel Fuel Tank	Batch Plant	Clear Diesel	4	1000	Rupture and filling spill	Double Wall Tank
Gasoline Fuel Tanks	Laydown Yard	Gasoline	1	1000	Rupture and filling spill	Double Wall Tank

During Construction

During the construction of the Fox Squirrel Solar Project, oil-filled operational equipment will be transported, stored, and delivered throughout the site. Specifics of where oil/oil-filled operational equipment will be stored and transported includes:

- Inverter:
 - Inverters will be stored in a temporary lined containment pit prior to installation.
 - Inverters will then be stored in a permanent containment pit.
 - Refer to **Appendix A** for the Transformer Layout Drawing and equipment drawings.
- Laydown Yard:
 - Fuel storage tanks (Diesel, Gasoline) for refueling of equipment and vehicles.
 - Storage of oil-filled operational equipment components, heavy machinery, vehicles.
 - Fuel delivery trucks will refill storage tanks on an “as needed” basis. Fuel delivery trucks will be owned and operated by a local vendor and will not be stored on-site.
 - Refer to **Appendix A** for the Laydown Yard Layout Drawing.
- Site-Wide (Refer to **Appendix A** for the Site Layout Drawing):
 - Vehicles will be traveling throughout the site daily.
 - Heavy equipment will be in use throughout the site daily.

2.3 Evaluation of Discharge Potential

Drainage and Distance to Navigable Waters

Drainage on-site will consist of surface runoff and ground infiltration. The Fox Squirrel Solar Project is located within the Ohio Region (05), consisting of Scotio River Basin subregion (HUC12 050600020201). The Project is located east of Bradford Creek.

General site drainage and layout is shown in **Appendix A**.

All discharges on the Project must be documented immediately. In the event of a discharge, the information listed below shall be documented in **Appendix F – Discharge History Summary**:

- Cause of the spill;
- Type and amount of substance spilled;
- Location, date, and time of spill;
- Waterbody, soil, or groundwater affected; and
- Action(s) taken to prevent reoccurrence.

DISCHARGE PREVENTION – GENERAL SPCC PROVISIONS

The sections below describe the project layout and areas of oil storage, along with measures to be implemented to prevent oil discharge during handling, use, or transfer of oil products on the Fox Squirrel Solar Project.

3.1 Description of Oil Storage Containers and Storage Areas: §112.7(a)(3)

Oil tanks and material storage will be located within the transformer facility, where all applicable regulations will be met to properly contain all oil products. Appendix A contains the overall project layout, oil tank capacities, and existing site drainage.

There are 75 inverters located on its own inverter skid. A containment pit will provide secondary containment around each inverter. Two died diesel fuel tanks, two clear diesel fuel tanks, and one gasoline fuel tank will be located in the laydown yard. Each tank will be double-walled.

Secondary containment is necessary around potential locations of accidental spills or releases, such as the hose connections or valves. Temporarily cover or otherwise block nearby catch basins or storm drains so that a spill or leak will be controlled.

3.2 Compliance with Applicable Requirements: §112.7(a)(2)

Applicable secondary containment requirements will be met on all oil-filled operational equipment throughout the site. The facility will also rely on routine inspections to ensure that no discharge events occur. Inspection reports must be kept with this Plan and documented throughout construction. An inspection form can be found in **Appendix C**.

3.3 Spill Reporting: §112.7(a)(4)

Spills shall be reported to the proper authorities as soon as possible. Table 3.3 shows what classifies as reportable quantities in the state of Ohio.

Table 3.3: Reportable Spilled Quantities

Pollutant	Location of Discharge	Reportable Spill Quantities
Oil (includes gasoline, petroleum, fuel oil, sludge, oil refuse, oil mixed with wastes, etc.)	All, excluding navigable waters	25 gallons or more
Oil (includes gasoline, petroleum, fuel oil, sludge, oil refuse, oil mixed with wastes, etc.)	Navigable waters	Amount which causes a visible film or sheen upon the surface of the water
Extremely Hazardous Substances	Please refer to 40 CFR Part 355	
CERCLA Hazardous Substances	Please refer to 40 CFR Part 302.4	

It is the responsibility of the Facility Manager to ensure that the proper authority's numbers are listed on-site if a spill or discharge of a reportable quantity has occurred. **In the event of a reportable incident, contact the Ohio Department of Environmental Quality, Central District Office at 1.800.282.9378, the Ohio Department of Natural Resources at 1.800.282.9378, and the National Response Center within 24 hours of the spill at 1.800.424.8802.** For additional information on spill response and reportable quantities, reference:

https://epa.ohio.gov/static/Portals/27/serc/SERC_Release_Reporting.pdf

In the event of a spill, the notification form found in **Appendix G** shall be completed. The following steps shown in Figure 3.3 shall be implemented immediately in the event of an oil spill on-site to reduce the risk of harm done.

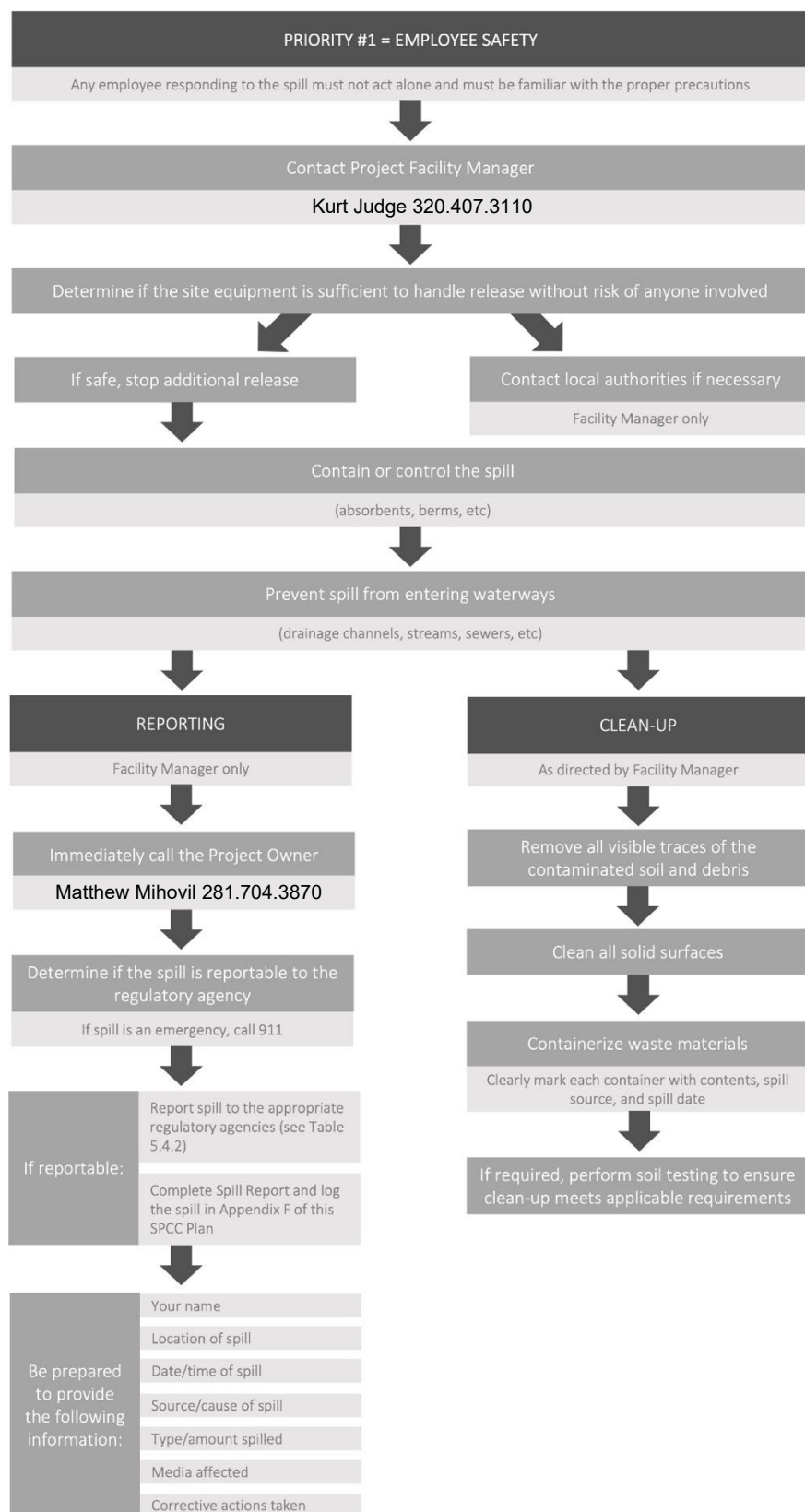


Figure 3.3: Oil Spill Response Flow Chart

3.4 Potential Discharge Volumes and Direction of Flow: §112.7(b)

Table 3.4 quantifies expected volume, discharge rate, the general direction of flow in the event of equipment failure and means of secondary containment for different parts of the facility where oil is stored, used, or handled.

Table 3.4: Potential Discharge Volumes and Direction of Flow

Potential Event		Maximum Volume Released (gallons)	Direction of Flow	Secondary Containment/ Spill Control Measures
Power Station	Leakage of Inverters (75)	13,500 – gradual to instantaneous	Pre-Installation: • Temporary lined containment pit Post-Installation: • Secondary containment	Storage time between delivery and installation in secondary containment will be minimized Area and equipment routinely inspected Routine inspection of equipment
	Leakage of Transformer (75)	49,500 – gradual to instantaneous	Pre-Installation: • Temporary lined containment pit Post-Installation: • Secondary containment	Storage time between delivery and installation in secondary containment will be minimized Area and equipment routinely inspected Routine inspection of equipment
Substation	Power Transformer	23,986 – gradual to instantaneous	Pre-Installation: • Temporary lined containment pit Post-Installation: • Secondary containment	Storage time between delivery and installation in secondary containment will be minimized Area and equipment routinely inspected Routine inspection of equipment
	Capacitor Bank	135 – gradual to instantaneous	Pre-Installation: • Temporary lined containment pit Post-Installation: • Secondary containment	Storage time between delivery and installation in secondary containment will be minimized Area and equipment routinely inspected Routine inspection of equipment
Laydown Yard / Batch Plant	Leakage of diesel fuel tanks (4)	4,000 died diesel 1,000 died diesel 3,000 clear diesel 4,000 clear diesel	Into secondary containment	Areas Routinely inspected Containers stored in or equipped with secondary containment Hose connections or valves will have secondary containment during re-filling and equipment refueling Spill kits located in each service vehicle and in storage areas next to fuel tank
	Leakage of gasoline fuel tanks	1,000	Into secondary containment	Areas routinely inspected Containers stored in or equipped with secondary containment Hose connections or valves will have secondary containment during re-filling and equipment refueling Spill kits located in each service vehicle and in storage areas next to fuel tank
Site-wide	Leakage of diesel from Mobile Generators (15)	55 diesel – gradual to instantaneous	Into secondary containment	Spill kits located in each service vehicle

3.5 Containment and Diversionary Structures: §112.7(c)

Methods of secondary containment on the Fox Squirrel Solar Project include a combination of structures (e.g., built-in secondary containment, grading), impermeable liners, and land-based spill response (e.g., sorbents) to prevent oil from reaching navigable waters. The following sections explain the containment and diversionary structures that will be used during the construction of the Fox Squirrel Solar Project.

During Construction

- Oil-filled Operational Equipment
 - The Plan provides an oil spill contingency plan (**Appendix E**) and a written commitment (Section 1.4) of workforce, equipment, and materials to quickly control and remove discharged oil and petroleum products.
- Spill Kits
 - Spill kits will be located in all project vehicles and equipment for use in the case of a discharge. Each spill kit can absorb 5 gallons of liquid.

3.6 Practicability of Secondary Containment: §112.7(d)

It has been determined that secondary containment is practicable on the Fox Squirrel Solar Project due to the nature of work and accessibility to secondary containment systems. All equipment will consist of secondary containment. Bulk oil containers will be double walled. All inverters will be temporarily stored in a lined containment pit pre-installation, and post-insulation will be stored in a permanent containment pit.

3.7 Inspection Program

Table 3.7: Inspection Program During Construction

Facility Component	Action	Frequency / Circumstances
Inverters	Inspect outside of the inverter for signs of deterioration and discharges	Monthly, visually using an inspection checklist
Emergency Response Equipment	Check the inventory of discharge response equipment and restock as needed	Monthly, visually using an inspection checklist
Bulk Storage Containers (Laydown Yard / Batch plant)	Inspect the exterior of containers and equipment for signs of deterioration, leaks, or corrosion Verify the integrity of the containment system	Monthly, visually using an inspection checklist

Daily / Continuous Observation

Continuous visual observations shall be completed during working hours on the Fox Squirrel Solar Project. These observations do not require documentation; however, all crew members should have knowledge of what to look for to identify issues with equipment and storage tanks, and what actions to take in the event of a spill.

Special attention shall be given to the oil-filled operational equipment on-site. Attention shall be given during delivery off-load and installation of each component that oil leakage is not occurring.

Monthly Inspections

A visual inspection of oil-filled equipment shall be conducted monthly. Inspectors will:

- Study the exterior of containers and equipment for signs of deterioration, leaks, or corrosion
- Verify the integrity of containment systems

- Check inventory of discharge response equipment and restocking as needed

Inspections should be documented using the inspection checklist found in **Appendix C** of this document.

Record Keeping

Written records of inspections signed by the appropriate supervisor or inspector must be kept on-site with this SPCC Plan for a minimum of three years upon completion of the construction phase of the Project. Written records of inspections will be transferred to the Owner upon completion of construction.

3.8 Personnel Training, and Discharge Prevention Procedures: §112.7(f)

The Site/Facility Manager is responsible for oil discharge prevention, control, and response preparedness activities at this facility. All training and briefings shall be documented in **Appendix D** of this SPCC Plan.

Personnel Training

Oil-handling personnel shall be instructed in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities shall be provided with this training prior to being involved in any oil handling operations.

Discharge Prevention Briefings

Discharge prevention briefings shall be conducted annually. The briefings shall be aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in this SPCC Plan. The briefings shall also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best management practices. Facility personnel shall be given the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

All training shall be documented and maintained on file at the site. The documentation shall include an overview of what was covered, who conducted the training, date(s), and names of participants.

3.9 Security: §112.7(g)

Personnel are generally present on-site from 6:00 AM to 6:00 PM five days per week. Construction and full-time personnel are typically present on the site during normal operating hours. A security company will also be employed to manage security on-site during nights and weekends. Security personnel will be in direct contact with local authorities in case of any security concerns that arise.

Along with hired security personnel, additional security measures will be implemented at this facility to prevent unauthorized access to oil-filled operational equipment at the site and to oil handling, processing, and storage areas:

- The inverters will be surrounded by a wire fence and a locked gate
- The inverters will be equipped with outdoor security lights
- Onsite security will be present once tracking and modules are at the facility
- Fuel tanks will not be powered at night and will be locked up

3.9 Containment for Contents of Largest Compartment: §112.7(h)

There are several discharge prevention measures being used at the facility during the unloading of fuel trucks. During the re-filling of bulk oil storage containers, secondary containment measures will be in place around potential locations of accidental spills or releases, such as the hose connections or valves. Temporarily covers or the blockage of nearby catch basins or storm

drains will be utilized so that a spill or leak will be controlled. Vehicle break interlock systems will be present in loading/unloading areas to prevent vehicles from departing before complete disconnection of oil transfer lines.

Inverters will be delivered to the facility filled with oil. Therefore, no filling of oil of the inverters will be necessary.

FACILITY PLAN REQUIREMENTS

4.1 Facility Drainage: §112.8(b)

Overall site drainage can be found in **Appendix A** and should be considered when placing and transporting oil storage containers.

- Inverter Skids:
 - Drainage from the concrete dikes surrounding equipment in the inverter will not be equipped with discharge pipes or valves. These diked areas will require emptying by manually activated pumps inserted into the diked areas as needed.
 - The condition of any accumulation liquids shall be inspected prior to activating a pump to ensure no oil will be discharged.
 - Diked waters shall not be allowed to flow to stormwater drains or surrounding bodies of water. Water must be contained and manually pumped and treated off-site.
 - Drainage logs will be maintained when secondary containment is pumped.
 - Inverters will be delivered to the facility filled with oil. Therefore, no filling of oil of the inverters will be necessary.

4.2 Bulk Tank Storage: §112.8(c)

Oil may only be stored in containers that are made of a material and constructed so that they are compatible with the material stored and conditions of storage such as pressure and temperature.

- A secondary means of containment shall be provided for all bulk storage containers capable of holding the entire capacity of the largest single container.
- Visible discharges that result in a loss of oil from the container shall be promptly corrected, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts.
- Adequate records of discharge events shall be maintained.

DISCHARGE RESPONSE

All efforts shall be made to prevent oil from reaching the water. Spill response activities will be prioritized based upon the proximity of the spill to waterways that contain flowing water, or that are likely to contain flowing water (e.g., from a rain event) before the spill can be contained.

An oil spill response flow chart is provided in Figure 3.3 of this SPCC plan. This Plan should be used in the event of a discharge. A current list of names and telephone numbers of the persons and organizations to be notified when an oil discharge is discovered is listed in Tables 5 and 5.4. Notification of authorities shall follow the requirements outlined in **Appendix H** and Table 5.4 of this SPCC Plan.

Table 5: Emergency Response Contacts

Title	Name, Organization	Contact Number
SPCC Plan Coordinator	Carter Kasuske	320.241.8322
Alternate SPCC Plan Coordinator	Kurt Judge	320.407.3110
National Response Center (NRC)	U.S. Environmental Protection Agency	1.800.424.8802
State Emergency Response	Ohio Department of Environmental Quality, Central District Office	1.800.282.9378
Spill Response Contractor	Madison County Disaster Services	740.852.4200
Police Department	London Police Department	911
	Non-Emergency	740.852.1414
Fire Department	Tri County Fire Department	911
	Non-Emergency	740.869.2643
Hospital	Madison Health	911
	Non-Emergency	740.845.7000
Ambulance Service	Sterling Joint Ambulance District	911
	Non-Emergency	740.869.3006

5.1 Definition of Responsibilities and Duties

Site / Facility Manager

The Site/Facility Manager or designated alternate shall have the following responsibilities:

- Mobilize and organize employees as necessary to assist with spill response
- Investigate the discharge to assess the actual or potential threat to human health or the environment:
 - Location of the discharge relative to receiving water bodies;
 - Quantity of spilled material;
 - Ambient conditions (temperature, rain);
 - Other contributing factors such as fire or explosion hazards; and
 - Sensitive receptors downstream.
- Request outside assistance from local emergency responders, as needed
- Evaluate the need to evacuate the facility and evacuate employees, as needed
- Notify:

- Local emergency responders;
 - State authorities;
 - National Response Center;
 - Response contractor(s); and
 - Local emergency planning committee.
- Communicate with neighboring property owners regarding the discharge and actions taken to mitigate the damage
- If the oil reaches (or threatens to reach) a navigable waterway, notify the National Response Center (1.800.424.8802) and the local fire/police departments to limit access to the waterway by residents until the oil has been contained and recovered
- Notify downstream water users of the spill and of actions that will be taken to protect these downstream receptors

Employee and Contractor

All employees on-site shall be trained and available to respond to an oil discharge. They may be assisted by pre-designated technicians who are employed by on-site contractors.

On-site personnel shall have the following responsibilities in the event of a spill or leak:

- If unsafe conditions exist (e.g., fire, explosion, or other threat to life), the employee should evacuate the area and call 911
- For spills less than 25 gallons that have not reached a water source, attempt to contain and control the spill, if safe to do so
- Immediately notify the Site/Facility Manager or designated alternate upon discovery of the spill
- After initial response measures have been taken, or if the spill is beyond the individual's ability to contain it, make a note of the time the spill occurred, the type of material spilled, and the approximate quantity of the spilled material. These items will be needed if subsequent reporting is required

5.2 Emergency Procedures

The field office trailer of Blattner shall be used as the oil discharge response operation center during the construction of the Fox Squirrel Solar Project.

Response to Minor Discharges

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

- The quantity of product discharged is small (e.g., may involve less than 25 gallons of oil);
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges will usually be cleaned up by facility personnel. In general, the following steps are taken if possible and safe to do so:

- Immediately turn off ignition sources near the spill
- Identify and shut down the source of the discharge to stop the flow
- Contain the discharge to the smallest area with sorbents, berms, fences, trenches, sandbags, or other material
- Take immediate action to prevent the discharge from reaching off-site or surface water
- Contact the Site/Facility Manager or his/her alternate

Response to Major Discharges

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

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

In the event of a major discharge, all workers will immediately evacuate the discharge site and notify the Site/Facility Manager. If the Site/Facility Manager is not present at the facility, the senior on-site person notifies the Site/Facility Manager of the discharge and has the authority to initiate notification and response actions.

The Site/Facility Manager (or senior on-site person) shall:

- Obtain medical assistance if workers are injured
- Notify the Fire Department or Police Department
- Coordinate clean-up and obtain assistance from a clean-up contractor or other responsible organization as necessary
- Ensure wastes are containerized and characterized for proper disposal by a licensed waste hauler or clean-up contractor

5.3 Waste Disposal

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler within two weeks.

Wastes resulting from a major discharge response will be removed and disposed of by a clean-up contractor.

5.4 Discharge Notification

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1.800.424.8802). The Center is staffed 24 hours a day.

Only the Site/Facility Manager (or senior on-site person) has the authority to initiate notification activities.

Internal Notifications

Spill information will be entered into the incident reporting system. The report will include the following information:

- Responsible organization (division/site name);

- Location information (state);
- General information (date of release, date reported, immediate action taken, ground conditions, external emergency services contacted, regulatory agencies notified);
- Severity: Critical, High, Medium, and Low;
- Loss control costs;
- Material release information (type, specific location, quantity, duration, secondary containment breached, media impacted, clean-up action, weather conditions);
- Action items (including responsible party, priority, and target and actual completion dates); and
- Cause(s) of release.

External Notifications

Table 5.4: Release Reporting Requirements

Type of Release	When to Report	Whom to Notify
25 gallons or more on land or water, excluding navigable waters To navigable waters which causes a visible film or sheen upon the surface of the water	Immediately after knowledge of discharge Complete Notification Form within 30 days	Ohio Department of Environmental Quality, Central District Office (1.800.424.8802) Ohio Department of Natural Resources (1.800.282.9378)
To navigable waters that could violate water quality standards Causes a sheen or discoloration Causes sludge or emulsion	Immediately after knowledge of discharge	National Response Center (1.800.424.8802)
Spill creates an imminent health threat	Immediately after knowledge of discharge	Local Emergency Response Officials (911 / Police: 740.852.1414 / Fire Department: 740.869.2643)
Greater than 25 gallons on land or water Causes a sheen or discoloration on water	As soon as possible, but no later than two weeks after knowledge of discharge	Owner or occupant of the property on which the discharge or spill occurred
More than 1,000 gallons in a single discharge to navigable waters More than 42 gallons in each of two discharges to navigable waters within any 12-month period	Within 60 days from occurrence	EPA Region 5 (312.353.2000)

The Site/Facility Manager (or senior on-site person) shall be responsible for providing the appropriate notifications.

In general, the notification shall include the following information:

- The exact address or location and phone number of the facility;
- Date and time of the discharge;
- Type of material discharged;
- An estimation of the total quantity discharged;
- An estimation of the total quantity discharged to navigable waters;
- Source of discharge;
- Description of all affected media;

- 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
- Names of individuals and organizations who have also been contacted.

Information shall also be submitted to the U.S. EPA Regional Administrator (RA) within 60 days from the occurrence of one of the following discharge events:

1. A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines
2. Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any 12-month period

The following information will be submitted:

- Name of the facility;
- Individuals name;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures are 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 the reportable discharge, including failure analysis of the system or subsystem in which the failure occurred; and
- Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence.

APPENDIX A

Project Layout
Existing Site Drainage
Laydown Yard

FOX SQUIRREL
SOLAR, LLC.
Madison County, Ohio

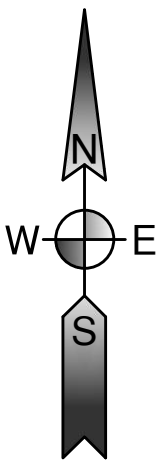
Rev.	Date	Description	By
0	07/26/2022	ISSUED FOR CONSTRUCTION	TLB



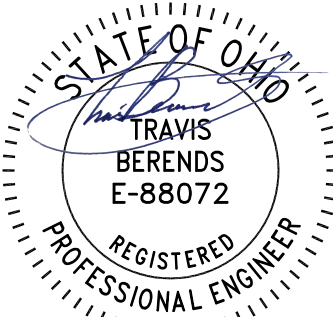
15445 Innovation Dr
San Diego, CA 92128



392 Co. Rd. 50,
Avon, MN 56310



NAD 83 Ohio State Planes,
South Zone, US Foot



Date: July 26, 2022



3350 38th Avenue South
Fargo, North Dakota 58104
Phone: 701.280.8500
Fax: 701.237.3191
www.ulteig.com
Project Number: 21.00649
Design By: C. SMAALADEN
Drawn By: K. GUNDERSON
Approved By: L. JORDAHL

OVERALL SITE PLAN

REVISION:
0

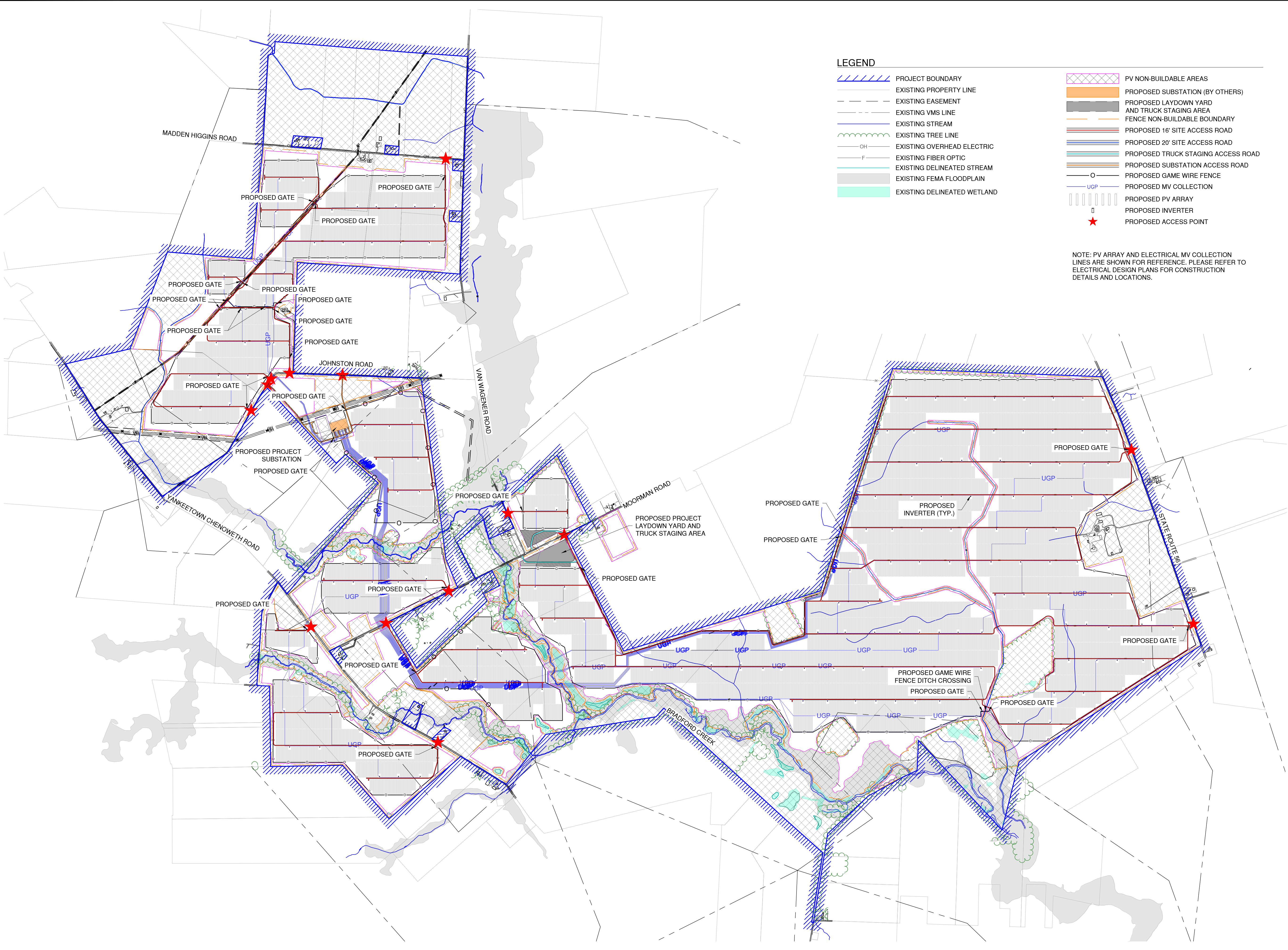
DRAWING:
FSSP-SG0-C-GRD2-G001

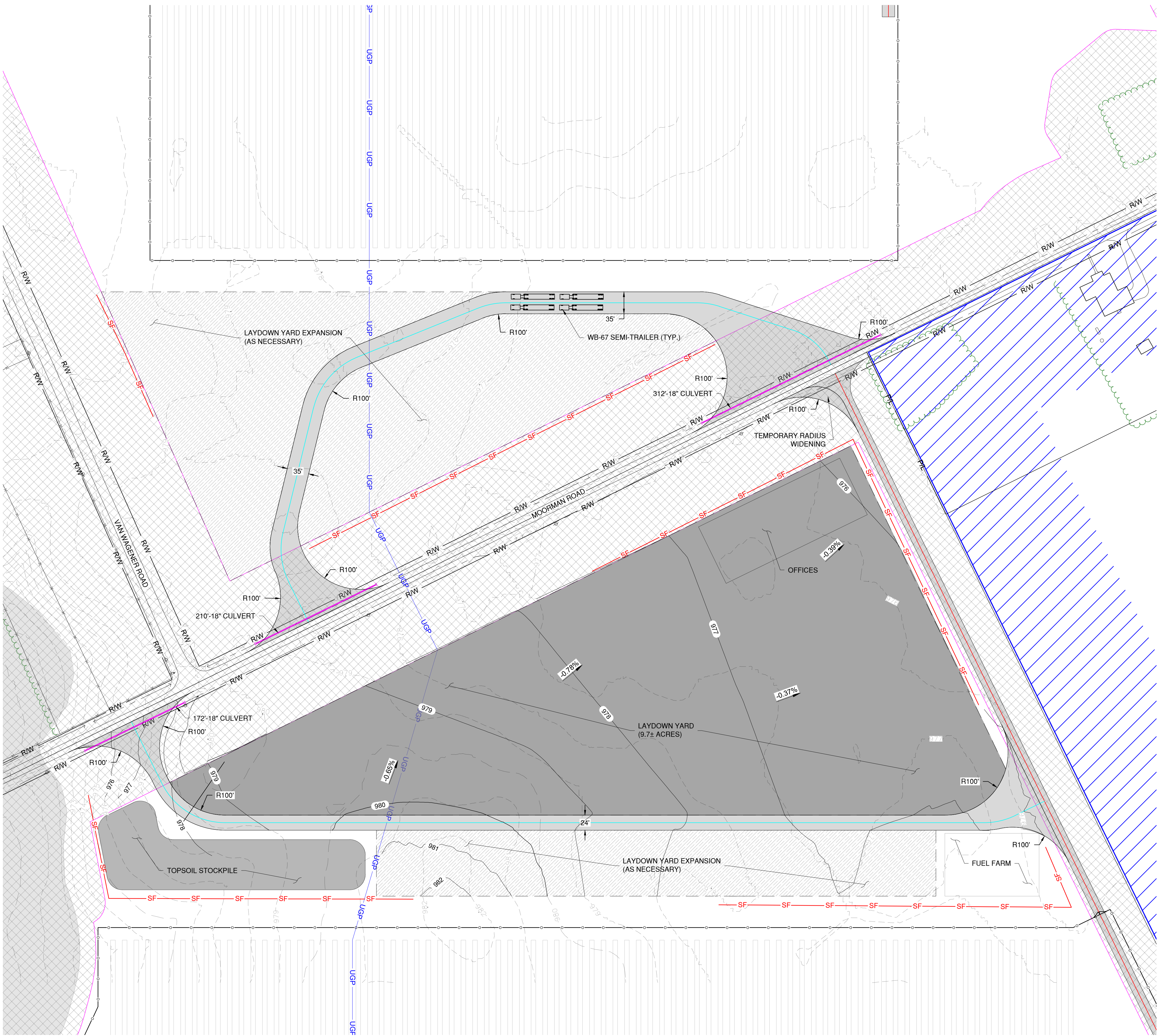
LEGEND

- PROJECT BOUNDARY
- EXISTING PROPERTY LINE
- EXISTING EASEMENT
- EXISTING VMS LINE
- EXISTING STREAM
- EXISTING TREE LINE
- EXISTING OVERHEAD ELECTRIC
- EXISTING FIBER OPTIC
- EXISTING DELINEATED STREAM
- EXISTING FEMA FLOODPLAIN
- EXISTING DELINEATED WETLAND

- PV NON-BUILDABLE AREAS
- PROPOSED SUBSTATION (BY OTHERS)
- PROPOSED LAYDOWN YARD AND TRUCK STAGING AREA
- FENCE NON-BUILDABLE BOUNDARY
- PROPOSED 16' SITE ACCESS ROAD
- PROPOSED 20' SITE ACCESS ROAD
- PROPOSED TRUCK STAGING ACCESS ROAD
- PROPOSED SUBSTATION ACCESS ROAD
- PROPOSED GAME WIRE FENCE
- PROPOSED MV COLLECTION
- PROPOSED PV ARRAY
- PROPOSED INVERTER
- PROPOSED ACCESS POINT

NOTE: PV ARRAY AND ELECTRICAL MV COLLECTION LINES ARE SHOWN FOR REFERENCE. PLEASE REFER TO ELECTRICAL DESIGN PLANS FOR CONSTRUCTION DETAILS AND LOCATIONS.





LEGEND

- PROJECT BOUNDARY
- EXISTING RIGHT OF WAY
- EXISTING PROPERTY BOUNDARY
- EXISTING EASEMENT
- EXISTING VMS LINE
- EXISTING STREAM
- EXISTING TREE LINE
- EXISTING DELINEATED STREAMS
- EXISTING CONTOUR - MAJOR
- EXISTING CONTOUR - MINOR
- EXISTING FEMA FLOODPLAIN
- EXISTING DELINEATED WETLAND
- EXISTING CULVERT
- PV NON-BUILDABLE AREAS
- FENCE NON-BUILDABLE BOUNDARY
- PROPOSED 16' SITE ACCESS ROAD
- PROPOSED LAYDOWN/TRUCK ACCESS ROAD
- PROPOSED GAME WIRE FENCE
- PROPOSED PV ARRAY
- PROPOSED LAYDOWN YARD AND TRUCK STAGING AREA
- PROPOSED CONTOUR - MAJOR
- PROPOSED CONTOUR - MINOR
- SILT FENCE

QUANTITIES		
ITEM	UNITS	QUANTITY
CUT - EG TO FG*	CY	4,080
FILL - EG TO FG*	CY	3,787
TOPSOIL STRIPPING	CY	7,297
SILT FENCE***	FT	3,263
5" AGGREGATE BASE (DRIVEWAY)	CY	1,796
4" AGGREGATE BASE** (LAYDOWN YARD)	CY	5,250

* CUT/FILL QUANTITIES ARE BASED ON EG SURFACE TO FG SURFACE COMPARISON. NO ADJUSTMENTS HAVE BEEN MADE FOR SHRINKAGE AND SWELLING. TOPSOIL QUANTITIES ARE BASED OFF AN ASSUMPTION OF 4 INCH DEPTH.
** DOES NOT INCLUDE EXPANSION AREAS.
*** INCLUDES EXPANSION AREAS.

FOX SQUIRREL SOLAR, LLC.
Madison County, Ohio

Rev.	Date	Description	By
0	07/26/2022	ISSUED FOR CONSTRUCTION	TLB

edf
renewables
15445 Innovation Dr
San Diego, CA 92128

BLATTNER ENERGY
392 Co. Rd. 50,
Avon, MN 56310



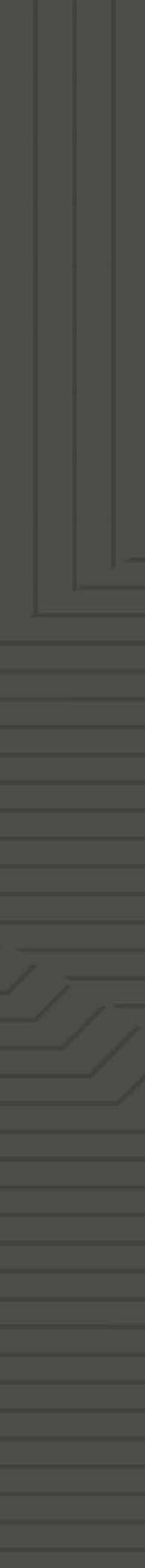
North arrow pointing up with N, S, E, W labels.
Graphic scale bar: 0, 40, 80, 160 feet.
Text: NAD 83 Ohio State Planes, South Zone, US Foot

Professional Engineer Seal for Travis Berends, E-88072, State of Ohio.
Date: July 26, 2022

Ulteig
3350 38th Avenue South
Fargo, North Dakota 58104
Phone: 701.280.8500
Fax: 701.237.3191
www.ulteig.com
Project Number: 21.00649
Design By: C. SMAALADEN
Drawn By: J. JOHNSON
Approved By: L. JORDAHL

LAYDOWN YARD AND TRUCK STAGING AREA PLAN

REVISION:
0
DRAWING:
FSSP-SG0-C-GRD6-P001



APPENDIX B | Certification of the Applicability of Substantial Harm Criteria

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

Fox Squirrel Solar LLC

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: ☒

2. Does the facility have a total oil storage capacity greater than or equal to 1 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: ☒

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR 112, Appendix A or a comparable formula*) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes: ☐

No: ☒

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

Yes: ☐

No: ☒

5. Does the facility have a total oil storage capacity greater than or equal to 1 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 5 years?

Yes: ☐

No: ☒

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Kurt Judge, Facility Manager

Date

* If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form

APPENDIX C | Monthly Inspection Form

MONTHLY INSPECTION CHECKLIST

For Use During Construction Phase

Inspection Date: _____

Inspector's Name: _____

Equipment / Area Inspected	Location	Unsatisfactory Conditions	None Observed
Inverters	Inverter Skid	<input type="checkbox"/> Damaged/rusted/deteriorated surfaces present? <input type="checkbox"/> Soil staining/leaks present? <input type="checkbox"/> Pooled oil present? <input type="checkbox"/> Poor storage practices in use? <input type="checkbox"/> Standing water in basin? (Accumulated water in basin must be removed and logged on log sheet)	<input type="checkbox"/>
Bulk Storage Containers	Laydown Yard	<input type="checkbox"/> Damaged/rusted/deteriorated surfaces present? <input type="checkbox"/> Soil staining/leaks present? <input type="checkbox"/> Pooled oil present? <input type="checkbox"/> Poor storage practices in use?	<input type="checkbox"/>
Main Power Transformers	Substation	<input type="checkbox"/> Damaged/rusted/deteriorated surfaces present? <input type="checkbox"/> Soil staining/leaks present? <input type="checkbox"/> Pooled oil present? <input type="checkbox"/> Poor storage practices in use?	<input type="checkbox"/>
Oil/Grease Container	Laydown Yard	<input type="checkbox"/> Damaged/rusted/deteriorated surfaces present? <input type="checkbox"/> Soil staining/leaks present? <input type="checkbox"/> Pooled oil present? <input type="checkbox"/> Poor storage practices in use?	<input type="checkbox"/>

[illegible]

APPENDIX D | SPCC Training Log

SPCC TRAINING LOG

Project Name	
Project Location	
Instructor's Name(s)	
Instructor's Title(s)	

Course Location: _____

Date: _____

Course Length (hours): _____

SPCC Training Topic

Check as appropriate:

<input type="checkbox"/> SPCC Understanding	<input type="checkbox"/> Emergency Procedures
<input type="checkbox"/> Spill Kit Use	<input type="checkbox"/> Inspections/Corrective Actions
<input type="checkbox"/> Pollution Prevention Measures	

Specific Training Objective:

APPENDIX E | Oil Spill Contingency Plan

OIL SPILL CONTINGENCY PLAN

INTRODUCTION

The purpose of this plan is to promote effective response to potential oil spills onto soil or surface water which could occur at the facility. It is also intended to minimize hazards to human health and the environment. This plan has been prepared according to 40 CFR 112.

The provisions of this plan will be carried out immediately whenever there is an incident which could threaten human health or the environment.

AUTHORITIES AND RESPONSIBILITIES

The following discussion defines the authorities and responsibilities of Blattner personnel as they pertain specifically to oil spills and associated emergencies.

2.1 Primary Emergency Coordinator

The Primary Emergency Coordinator is responsible for coordinating all emergency response measures at the facility. The Primary Emergency Coordinator is familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the characteristics of materials handled, the location of all records at the facility, including emergency response records, and the facility layout. This person has the authority to commit the resources needed to carry out the contingency plan.

2.2 Alternate Emergency Coordinators

The Alternate Emergency Coordinators will coordinate with the Primary Emergency Coordinator or act on their behalf. The Alternate Emergency Coordinators are familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the characteristics of materials and wastes handled, the location of all records at the facility, including emergency response records, and the facility layout.

2.3 Environmental Manager

The responsibility of the Environmental Manager is to ensure used oil and oily debris is disposed of according to applicable State and Federal regulations.

2.4 Emergency Telephone Numbers

Key Blattner personnel, including Emergency Coordinators and agencies to be contacted in the event of a spill, are identified on the Spill Reporting Matrix, Contact List, and Spill Log provided in **Appendix C** of the SPCC Plan. Contact the Environmental Manager for assistance.

2.5 Spill Prevention Responsibilities

Procedures in place to prevent oil spills include routine inspections of oil and hazardous materials storage areas. Logs of these inspections are maintained at the facility.

RESPONSE PROCEDURES FOR OIL SPILLS

The emergency response procedures in this Section describe the actions to be taken in the event of an oil release.

3.1 First Employee at the Scene

The responsibilities of an employee arriving at the scene of an oil spill, hazardous materials release, or associated emergency are as follows:

1. Observe from a safe distance
2. Identify hazards
3. Restrict access to the spill area
4. Call for assistance. Provide the Emergency Coordinator or Manager with the following information:
 - Your name and telephone number
 - Any injuries
 - Location and type of spill
 - Source and cause of spill, if known
 - Fire or explosion risk
 - Actions taken to stop/contain the release
 - Notify the fire department if needed
5. **If safe to enter the area**, attend to any injured. Administer first aid if you have been trained and certified. Call an ambulance or paramedic.
6. **If safe to do so**, stop the source of the discharge. *Note: If material is unknown, can cause immediate hazards to life or health, is producing fumes, vapors, etc., never enter the area without the proper personal protective equipment and support persons.*

This may involve:

- shutting off equipment or pumps;
- closing a valve; and/or
- righting an overturned container or piece of operating equipment.

Simultaneously pursue containment of the discharge with the following containment techniques:

- For relatively small spills, apply absorbent to the surface of the spill enough to absorb all the liquid.
 - For larger spills, construct earthen dikes or ditches around the spill to prevent the discharge from flowing off-site or into waterways.
 - Prevent discharge into storm drains by sealing off with plastic and/or earthen dikes.
7. Remain at the scene to prevent other people or vehicles from entering the emergency area until relieved by the Emergency Coordinator.

3.2 Initial Emergency Coordinator Action

1. The Emergency Coordinator must gather as much information as possible to assess the magnitude and severity of the spill in order to initiate appropriate actions. This may involve telephone calls to operations or maintenance personnel who may have seen the spill or to office personnel who can assist in collection of resources such as Safety Data Sheets or Spill Prevention Plan.
2. The Emergency Coordinator then goes to the scene of the spill to initiate an appropriate response plan.
3. Notification of local governmental authorities, if applicable. Perform spill reporting in accordance with the Spill Reporting Matrix in **Appendix C**.

3.3 Response Plan Developed and Implemented

1. Identify if any injuries have occurred and that proper actions have been taken.

2. Assess the possible hazard to human health, property, or the environment.
 - Isolate spill from human or vehicular contact. (Use cones, stanchions, and tape; post signs.) Order all personnel not involved with the cleanup operation to leave the area.
 - If the emergency threatens human health, activate alarms or communications systems to notify all persons for evacuation.
 - If the emergency threatens human health outside the facility boundaries and local areas must be evacuated, notify Blattner Safety Manager to assist with the notification of the National Response Center (NRC), the state Emergency Response Center and the local emergency assistance organizations.

See Section 6.11 for telephone numbers.

The verbal notification should include the following information:

- Name and telephone number of person reporting release
 - Name and address of the facility
 - Time and type of incident
 - Location of the release
 - Hazardous material and estimate of the quantity
 - Extent of injuries
 - Potential hazards (if known)
3. Identify what material is involved.
 4. Identify personal protective equipment that may be required in the area.
 5. Evaluate the resources needed, such as manpower, equipment, and cleanup materials, and call for outside contractor assistance, if needed. Cleanup/Disposal Resources are listed in Section 6.

The Emergency Coordinator is responsible for determining when a cleanup is complete. Depending on the nature and magnitude of the spill, this decision may be made in consultation with state/local agencies having jurisdiction in the affected area.
 6. Cleanup efforts must be undertaken to restore the affected area to its pre-spill condition to the maximum extent possible.
 - For relatively small spills, absorbent will be applied and re-applied until there is enough to absorb all the liquid. This material will be picked up with stiff brooms and shovels and placed in approved waste containers for disposal in accordance with applicable regulations.
 - For spills in buildings or on paved areas, a second application of absorbent will be spread over the contaminated area and swept with stiff brooms to remove residues which may remain. Spill debris and cleanup materials will be placed in approved containers for disposal in accordance with applicable regulations.
 - Spill debris and cleanup materials will be placed in approved containers for disposal in accordance with applicable regulations. Soil which has been removed will be placed in approved waste containers for disposal in accordance with applicable regulations.
 7. Identify appropriate company and agency notification requirements.

3.4 Follow-up Actions

Restock all emergency spill control equipment and supplies to maintain the inventory listed in **Appendix D**.

Critique spill response actions to identify measures to avoid future incidents and to improve the efficiency of future spill cleanup actions.

3.5 Document Response Actions

Reportable oil spills must be carefully documented, so that sufficient information is available to concerned agencies and should include photographs for major spills or when appropriate.

3.6 Follow-Up Reporting

Contact the Environmental Manager for assistance in filing the required written agency notifications described below:

- The responsible person shall notify the agency as soon as possible, whenever necessary, to provide information that would trigger a change in the response to the spill or discharge.
- **Notification of local governmental authorities.** If the discharge or spill creates an imminent health threat, the responsible person shall immediately notify and cooperate with local emergency authorities (fire department, fire marshal, law enforcement authority, health authority, or Local Emergency Planning Committee [LEPC], as appropriate).
- **Notification to property owner and residents.** As soon as possible, but no later than two weeks after discovery of the spill or discharge. The responsible person shall reasonably attempt to notify the owner (if identifiable) or occupant of the property upon which the discharge or spill occurred as well as the occupants of any property that the responsible person reasonably believes is adversely affected.
- For discharges of oil in two reportable events within any 12-month period, a report must be submitted to EPA Region 5 at the following address:

U.S. Environmental Protection Agency – Region 5
77 W Jackson Blvd
Chicago, IL 60604
312.353.2000

EMERGENCY EQUIPMENT

This section describes the emergency equipment at the facility and the applicable maintenance and inspection schedules.

- **Communication and/or Alarm System.** Cellular phones are available for primary communications and site radios will also be available.
- **Spill Control Equipment.** A list of spill control equipment that may be found at this facility is presented in **Appendix D** of the SPCC Plan.

EMERGENCY ASSISTANCE

Refer to **Appendix C** of the SPCC Plan for telephone numbers and addresses of local authorities.

CLEANUP/DISPOSAL RESOURCES

The following firms are on contract with Blattner and will be called, if needed, to assist with cleanup and disposal operations. Contact the Environmental Manager to confirm contractor availability or use of another approved local contractor.

6.1 Hazardous Waste Haulers and Clean Up Contractors

Spill Cleanup, Response, and Transportation	Arrangements
Clean Earth 295 Edison Dr Middletown, OH 45044 (678.822.9963	Oil Spill Response and Hazardous Waste - Cleanup and Transportation

APPENDIX F | Discharge History Summary

SPILL LOG

Discharge/Discovery Date		Time			
Facility Name					
NCR #					
Facility Address					
Location of Spill		Description of Spill Location			
Name of Reporting Individual		Telephone Number			
Type of Material Discharged		Estimated Total Quantity Discharged (gallons/barrels)			
Source of the Discharge		Media Affected			
Actions Taken					
Damage or Injuries	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Evacuation Needed	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Organizations and Individuals Contacted					
National Response Center		Contact Date and Time			
Cleanup Contractor		Contact Date and Time			
Facility Personnel		Contact Date and Time			
State Agency		Contact Date and Time			
Other		Contact Date and Time			

APPENDIX G | Discharge Notification Form

DISCHARGE NOTIFICATION FORM

Facility:

Description of Discharge		
Date/Time	Release Date:	Discovery Date:
	Release Time:	Discovery Time:
	Duration:	
Reporting Individual	Name:	Telephone Number:
Location of Discharge	Latitude:	Description:
	Longitude:	
Equipment Source	<input type="checkbox"/> Transformer Equipment	Description:
	<input type="checkbox"/> Fuel Storage Tanks	Equipment ID:
	<input type="checkbox"/> Heavy Equipment	
Product	<input type="checkbox"/> Mineral Oil	
	<input type="checkbox"/> Diesel Fuel	
	<input type="checkbox"/> Hydraulic Fluid	
	<input type="checkbox"/> Other* *Describe Other:	
Appearance and Description		
Environmental Conditions	Wind Direction:	Rainfall:
	Wind Speed:	
Impacts		
Quantity	Released:	Recovered:
Receiving Medium	<input type="checkbox"/> Water**	**If water, indicate extent and body of water:
	<input type="checkbox"/> Land	<input type="checkbox"/> Release confined to project property
	<input type="checkbox"/> Other (describe)	<input type="checkbox"/> Release outside project property
Describe circumstances of the release:		
Assessment of impacts and remedial actions:		
Action(s) taken to prevent incident from reoccurring:		
Safety Issues:	<input type="checkbox"/> Injuries	
	<input type="checkbox"/> Fatalities	
	<input type="checkbox"/> Evacuation	



APPENDIX H | EPA Oil Discharge Reporting Requirements



Oil Discharge Reporting Requirements

How to Report Oil Discharges to the National Response Center and EPA

If a facility or vessel discharges oil to navigable waters or adjoining shorelines, waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act of 1974, or which may affect natural resources under exclusive U.S. authority, the owner/operator is required to follow certain federal reporting requirements. These requirements are found in two EPA regulations – 40 CFR part 110, Discharge of Oil regulation, and 40 CFR part 112, Oil Pollution Prevention regulation. The Discharge of Oil regulation provides the framework for determining whether an oil discharge to inland and coastal waters or adjoining shorelines should be reported to the National Response Center. The Oil Pollution Prevention regulation, part of which is commonly referred to as the “SPCC rule,” identifies certain types of discharges from regulated facilities that also need to be reported to EPA. Although these reporting requirements were not changed by EPA’s recent modifications of the SPCC rule, this Fact Sheet will help facilities with the Reportable Discharge History criterion associated with the qualified facility option and the oil-filled operational equipment option offered in the recent SPCC modifications.

Who is subject to the Discharge of Oil regulation?

Any person in charge of a vessel or of an onshore or offshore facility is subject to the reporting requirements of the Discharge of Oil regulation if it discharges a harmful quantity of oil to U.S. navigable waters, adjoining shorelines, or the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act of 1974, or which may affect natural resources under exclusive U.S. authority.

What is a “harmful quantity” of discharged oil?

A harmful quantity is any quantity of discharged oil that violates state water quality standards, causes a film or sheen on the water’s surface, or leaves sludge or emulsion beneath the surface. For this reason, the Discharge of Oil regulation is commonly known as the “sheen” rule. Note that a floating sheen alone is not the only quantity that triggers the reporting requirements (e.g., sludge or emulsion deposited below the surface of the water may also be reportable).

Under this regulation, reporting oil discharges does not depend on the specific amount of oil discharged, but instead can be triggered by the presence of a visible sheen created by the discharged oil or the other criteria described above.

To whom do I report an oil discharge?

A facility should report discharges to the National Response Center (NRC) at 1-800-424-8802 or 1-202-426-2675. The NRC is the federal government’s centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

If reporting directly to NRC is not practicable, reports also can be made to the EPA regional office or the U.S. Coast Guard Marine Safety Office (MSO) in the area where the incident occurred.

When must I report to NRC?

Any person in charge of a vessel or an onshore or offshore facility must notify NRC immediately after he or she has knowledge of the discharge.

What information do I need to report?

NRC will ask a caller to provide as much information about the incident as possible including:

- Name, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the discharge
- Types of material(s) discharged
- Quantity of materials discharged
- Danger or threat posed by the discharge

- Number and types of injuries (if any)
- Weather conditions at the incident location
- Other information to help emergency personnel respond to the incident

How are reports to NRC handled?

NRC relays information to an EPA or U.S. Coast Guard On Scene Coordinator (OSC), depending on the location of the incident. After receiving a report, the OSC evaluates the situation and decides if federal emergency response action is necessary.

If I report a discharge to NRC, do I also report to EPA?

If a facility is regulated under the SPCC rule and has a reportable discharge according to EPA regulations (see below), it must be reported to both NRC and EPA.

What are the oil discharge reporting requirements in the SPCC rule?

Any facility owner/operator who is subject to the SPCC rule must comply with the reporting requirements found in §112.4.

A discharge must be reported to the EPA Regional Administrator (RA) when there is a discharge of:

- More than 1,000 U.S. gallons of oil in a single discharge to navigable waters or adjoining shorelines
- More than 42 U.S. gallons of oil in each of two discharges to navigable waters or adjoining shorelines occurring within any twelve-month period

When determining the applicability of this SPCC reporting requirement, the gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines, not the total amount of oil spilled.

What do I need to submit to EPA?

The owner/operator must provide the following:

- Name and location of the facility
- Owner/operator name
- Maximum storage/handling capacity of the facility and normal daily throughput
- Corrective actions and countermeasures taken, including descriptions of equipment repairs and replacements

- Adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary
- Cause of the discharge to navigable waters, including a failure analysis
- Failure analysis of the system where the discharge occurred
- Additional preventive measures taken or planned to take to minimize discharge reoccurrence
- Other information the RA may reasonably require

An owner/operator must also send a copy of this information to the agency or agencies in charge of oil pollution control activities in the state in which the facility is located.

What happens after a facility submits this information to EPA?

The EPA Regional Administrator will review the information submitted by the facility and may require a facility to submit and amend its SPCC Plan. Facilities and equipment that qualified for the new streamlined requirements may lose eligibility for those options as determined by the Regional Administrator. A state agency may also make recommendations to EPA for a facility to amend its Plan to prevent or control oil discharges.

For More Information

Review the Discharge of Oil regulation (40 CFR part 110)

<http://www.gpoaccess.gov/cfr/>

Review the Oil Pollution Prevention regulation (40 CFR part 112)

<http://www.gpoaccess.gov/cfr/>

Visit the EPA Office of Emergency Management Web site

www.epa.gov/emergencies

Call the Superfund, TRI, EPCRA, RMP, and Oil Information Center

(800) 424-9346 or (703) 412-9810

TDD (800) 553-7672 or (703) 412-3323

www.epa.gov/superfund/resources/infocenter

To Report an Oil or Chemical Discharge

Contact the National Response Center

(800) 424-8802 or (202) 267-2675

TDD (202) 267-4477

<http://www.nrc.uscg.mil/index.html>

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Summary: Notice - Compliance with Condition 29 – Spill Prevention, Control, and Countermeasure Plan electronically filed by Christine M.T. Pirik on behalf of Fox Squirrel Solar, LLC