

## Section 15. GROUNDWATER

### 15.1. LOCATION, QUANTITY, AND POTENTIAL SOURCES OF CONTAMINATION

The northern portion of the proposed Project is located in the Northeast Bluff and Montegail Pond quadrangles, with the southern T18 MD BPP facilities in the Schoodic Lake quadrangle, and the Columbia facilities, including the proposed Operations and Maintenance building, in the Epping Quadrangle. Figure 15-1 depicts relationships between proposed facilities, Project areas surveyed for wetlands, and significant mapped sand and gravel aquifers.

The proposed Project will not have any direct effects on subsurface waters. Appropriate erosion prevention and sedimentation control measures will be implemented during construction and operations. The following discussion demonstrates the proposed Project will not have an unreasonable risk of discharge to significant groundwater aquifers, and that the proposed Project will not have an unreasonable adverse effect on groundwater quality or quantity.

While there are irrigation wells supporting active wild blueberry production in various areas of the Project site plan, there are no known public drinking water supply wells within 100 feet of the Project's components. There are also no U.S. Environmental Protection Agency-designated sole source aquifers within the Project area.

The Project will not utilize, discharge, or extract groundwater during construction or operation of the wind turbines or associated electrical infrastructure. Additionally, the Project will not use pesticides; therefore, the Project is not anticipated to adversely impact groundwater quantity or quality.

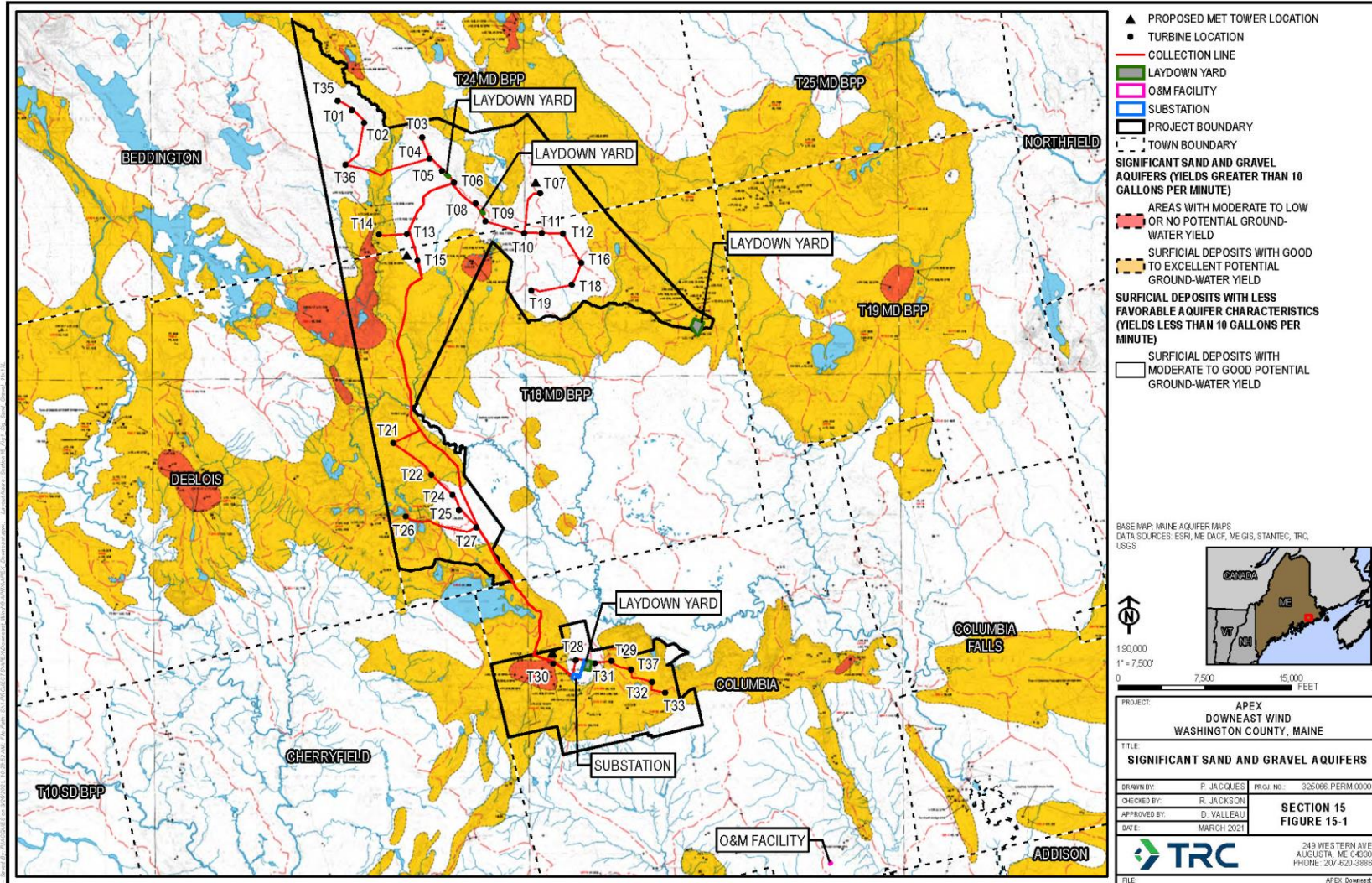
### 15.2. MEASURES TO PREVENT DEGRADATION

The potential sources of groundwater contamination during Project construction will be associated with fuel, hydraulic fluids, and lubricating oils use in the operation of vehicles and construction equipment. However, any spills of these materials from the equipment are typically minimal, are of short duration, and can be reasonably managed. Spills that are adequately addressed (see Construction Spill Prevention, Containment, and Control Plan provided as Exhibit 15-1) will not threaten groundwater quality. The construction contractors will be responsible for storage and handling of these materials; including adhering to contingency plans to address any spills that may occur. The Maine Department of Environmental Protection (MDEP) regional office in Bangor, Maine will be notified as required of any spills that occur during the construction and operation of the Project.

### 15.3. GROUNDWATER PROTECTION PLAN AND MONITORING

The procedures to prevent groundwater degradation during construction of the proposed Project are incorporated in the erosion control requirements (Section 14), and the CSPCC. Additionally, the stormwater management procedures to be followed in Project design, construction, and operation are described in Section 12 of this Application. The CSPCC (Exhibit 15-1) addresses the prevention of, response to, and reporting of spills. It also addresses routine equipment inspection and maintenance to be provided by the contractor. This plan will be submitted to MDEP prior to commencement of construction.

Figure 15-1. Significant Sand and Gravel Aquifers



## 15.4. GROUNDWATER PROTECTION PLAN AND MONITORING

Existing surface water drainage characteristics will not be significantly altered by the project, as detailed in Section 12. There may be temporary impacts to surface water drainage during construction. The use of herbicides, petroleum and other hydrocarbon products during construction and operation could potentially represent a threat to groundwater quality. Measures to address these impacts are included in the sample CSPCC from the Isabella Wind Project (Exhibit 15-1). They are also addressed in Sections 10 and 14 of this Application.

### 15.4.1. GROUNDWATER PROTECTION DURING OPERATION

Prior to operations, an Operations SPCC plan will be completed and filed with the MDEP for review. This plan will be similar in substance to the Operation SPCC for the Cameron Wind Project (Exhibit 15-2).

Oil products will be used to maintain and repair the project facilities. Oil is stored at the turbine sites, the O&M facility, and the Substation. The turbine sites will store gear oil and hydraulic oil in the transformers. The O&M facility will store heat oil, hydraulic oil, mineral oil, and waste oil. The substation will store mineral oil in the main power transformer. Oils and greases required for turbine maintenance will be stored at the O&M facility in the original project containers. All storage containers will be designed to be compatible with oils with appropriate temperature and pressure conditions.

The following measures will be implemented to prevent oil discharges during the handling, use, or transfer of oil products (See Exhibit 15-2). All oil-handling employees will be properly trained for the following measures:

- Original product packaging will be used to store new mineral and hydraulic oil.
- Product containers will meet the U.S. Department of Transportation performance standard for containers containing petroleum products and are not reused for oil storage.
- The containers will be stored within a containment pit at the O&M facility.
- Visual integrity inspection will be conducted daily and there will be written inspection procedures on a monthly basis.
- Trained oil personnel will be present during loading and unloading activities.

#### ***Containment***

Drainage from the containment pits surrounding totes, drums, and transformers at the O&M and Substation are controlled by the impervious sides of the pits and berms. Additionally, there are methods of secondary containment such as prefabricated structures and land-based spill response to prevent oil from reaching navigable waters and adjoining shorelines. These methods are:

- Double-walled Tanks
- Bulk Storage-The secondary containment pit will have enough volume to contain 110% of the largest container in the pit.



- Wind Turbines-The nacelle can contain liquids up to 40 gallons. Any overflow would run down the inner tower support. Sorbent materials will be used to clean up and contain oil as needed.
- Sorbent Material-Spill cleanup kits that include sorbent material, booms, and other portable barriers will be located near the oil storage area at the O&M. Portable spill kits will be located in all on-site vehicles.

### ***Reporting***

All spills will be reported to the appropriate emergency contacts in accordance with approved SPCC and state and federal requirements.

In addition, the plant operators will inspect the outside of containers to observe deterioration, discharges or accumulation of oil inside containment areas. Inspections will be documented in reports including the following:

- Observing the exterior of portable containers for signs of deterioration or leaks;
- Observing the fill ports for poor construction that could cause a discharge;
- Observing the exterior of oil-filled operational equipment for signs of deterioration or leaks;
- Observing secondary containment areas for signs of releases; and
- Checking the inventory of discharge response equipment.





**EXHIBIT 15-1: CONSTRUCTION SPILL PREVENTION, CONTAINMENT, AND CONTROL PLAN**

# Isabella Wind

## Spill Prevention, Control, and Countermeasure (SPCC) Plan

Isabella and Midland Counties, Michigan

September 6, 2019



Prepared By:

**Westwood**

Prepared For:

**FAGEN  
INC.**

Team is what it takes.®

# Spill Prevention, Control, and Countermeasure (SPCC) Plan

Isabella Wind

Isabella and Midland Counties, Michigan

**Prepared for:**

Fagen, Inc.  
501 West Highway 212  
Granite Falls, MN 56241  
507-829-6235

**Prepared by:**

Westwood Professional Services Michigan, LLC  
12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343  
(952) 937-5150

Project Number: 0014171.00  
Date: September 6, 2019

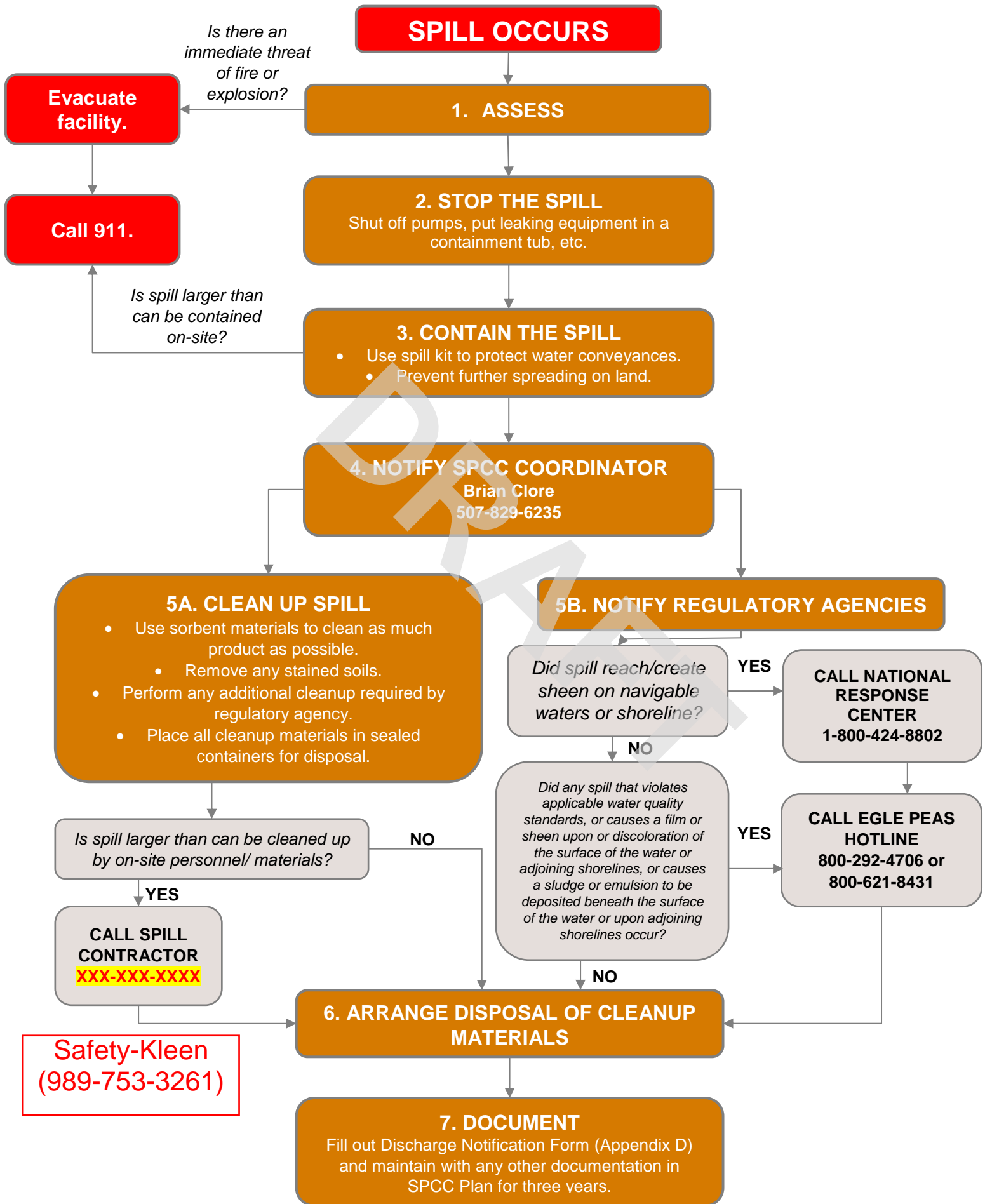


## TABLE OF CONTENTS

<b>1.0</b>	<b>INTRODUCTION</b> .....	<b>2</b>
1.1	Purpose .....	2
1.2	Professional Engineer Certification .....	3
1.3	Management Certification of the SPCC Plan .....	4
1.4	Location of the SPCC Plan .....	5
1.5	Plan Review .....	5
1.6	SPCC Provision Cross-Reference .....	5
<b>2.0</b>	<b>GENERAL FACILITY INFORMATION</b> .....	<b>8</b>
2.1	Description of the Facility .....	8
2.2	Administration of Responsibility .....	9
2.3	Oil Storage .....	10
2.4	Discharge Potential .....	12
<b>3.0</b>	<b>DISCHARGE PREVENTION</b> .....	<b>12</b>
3.1	Facility Layout Diagram and Remote Sites .....	12
3.2	Spill Reporting Procedures .....	13
3.3	Potential Discharge Volumes and Direction of Flow .....	13
3.4	Containment Drainage .....	14
3.5	Containment and Diversionary Structures .....	14
3.6	Practicability of Secondary Containment .....	15
3.7	Inspections, Tests, and Records .....	15
	3.7.1 Monthly Inspections .....	15
3.8	Personnel, Training, and Discharge Prevention Procedures .....	16
3.9	Security .....	17
3.10	Loading/Unloading .....	17
3.11	Brittle Fracture Evaluation .....	19
3.12	Conformance with State and Local Applicable Requirements .....	19
<b>4.0</b>	<b>DISCHARGE RESPONSE</b> .....	<b>19</b>
4.1	Response to a Minor Discharge .....	20
4.2	Response to a Major Discharge .....	20
4.3	Waste Disposal .....	21
4.4	Discharge Notification .....	21

**Appendix A: Substantial Harm Determination ..... 29**  
**Appendix B: Plan Review Log ..... 30**  
**Appendix C: Emergency Contacts ..... 31**  
**Appendix D: Discharge Notification Form ..... 33**  
**Appendix E: Record of Secondary Containment ..... 36**  
**Appendix F: Calculation of Secondary Containment ..... 37**  
**Appendix G: Monthly Facility Inspection ..... 38**  
**Appendix H: Discharge Prevention Briefing and Training Log ..... 40**

DRAFT



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



## 1.0 INTRODUCTION

### 1.1 Purpose

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for Fagen, Inc. (Fagen) for the construction of the Isabella Wind (Project) site located in Isabella and Midland Counties, Michigan ("Facility," see [Facility Location Figures](#)). The Project is located within the Nottawa, Denver, Gilmore, Isabella, Vernon, Warren, and Geneva townships and encompasses an area of 58,000 acres; however, construction activity and disturbed area will consist of approximately 1,890 acres. Construction should include the installation of 136 General Electric (GE) 2.82 megawatt (MW) wind turbines, 138 padmount transformers, a substation, a switch yard (built by others), meteorological towers, a temporary laydown yard, underground and overhead electrical collection, crane paths, and gravel access roads.

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

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

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

## **1.2 Professional Engineer Certification**

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

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

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

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

---

Christopher Carda  
Michigan PE #6201059397

952-906-7459

September 6, 2019

### **1.3 Management Certification of the SPCC Plan**

The Owner of the Isabella Wind project is Apex Clean Energy, Inc. (Apex). Apex has engaged Fagen as the General Contractor for the Project. This SPCC Plan is being managed by Fagen and applies to the construction of the Project. Apex will prepare a separate SPCC Plan for the operation of the Project that will go into effect once construction is complete.

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

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

---

Brian Clore  
Fagen, Project Manager  
507-829-6235  
September 6, 2019



## 1.4 Location of the SPCC Plan

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

**Table 1-1: Location of SPCC Plan**

General Location of the Plan	Laydown Yard
Hours Location is Attended	7:00 AM to 5:30 PM Monday through Saturday
Specific Location of the Plan	Main office area in the Fagen construction trailer in the Laydown Yard
Location of Notices Regarding SPCC Plan	Notice of the location of the SPCC Plan will be posted on the Project information board in the Laydown Yard.

## 1.5 Plan Review

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

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

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

The review and evaluation must be documented in a Plan Review Log, the form of which is contained in the [Appendix B: Plan Review Log](#). The Plan Review Log must state whether the SPCC Plan will be amended. Any technical revision to the SPCC Plan must be certified by a Professional Engineer in Michigan.

## 1.6 SPCC Provision Cross-Reference

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

**Table 1-2: SPCC Cross Reference**

<b>Provision</b>	<b>Plan Section</b>	<b>Page</b>
112.3(d)	<a href="#">1.2 Professional Engineer Certification</a>	<a href="#">3</a>
112.3(e)	<a href="#">1.4 Location of the SPCC Plan</a>	<a href="#">5</a>
112.4	<a href="#">4.4 Discharge Notification</a>	<a href="#">21</a>
112.5	<a href="#">1.5 Plan Review</a>	<a href="#">5</a>
112.7	<a href="#">1.3 Management Certification of the SPCC Plan</a>	<a href="#">4</a>
112.7	<a href="#">1.6 SPCC Provision Cross-Reference</a>	<a href="#">5</a>
112.7(a)(3)	<a href="#">2.0 GENERAL FACILITY INFORMATION</a>	<a href="#">8</a>
112.7(a)(3)	<a href="#">3.1 Facility Layout Diagram and Remote Sites</a>	<a href="#">12</a>
112.7(a)(3)	<a href="#">3.2 Spill Reporting Procedures</a>	<a href="#">13</a>
112.7(a)(4)	<a href="#">3.0 DISCHARGE PREVENTION</a>	<a href="#">12</a>
112.7(a)(5)	<a href="#">3.0 DISCHARGE PREVENTION</a>	<a href="#">12</a>
112.7(b)	<a href="#">3.3 Potential Discharge Volumes and Direction of Flow</a>	<a href="#">13</a>
112.7(c)	<a href="#">3.5 Containment and Diversionary Structures</a>	<a href="#">14</a>
112.7(d)	<a href="#">3.6 Practicability of Secondary Containment</a>	<a href="#">15</a>
112.7(e)	<a href="#">3.7 Inspections, Tests, and Records</a>	<a href="#">15</a>
112.7(f)	<a href="#">3.8 Personnel, Training, and Discharge Prevention Procedures</a>	<a href="#">16</a>
112.7(g)	<a href="#">3.9 Security</a>	<a href="#">17</a>
112.7(h)	<a href="#">3.10 Loading/Unloading</a>	<a href="#">17</a>
112.7(i)	<a href="#">3.11 Brittle Fracture Evaluation</a>	<a href="#">19</a>
112.7(j)	<a href="#">3.12 Conformance with State and Local Applicable Requirements</a>	<a href="#">19</a>
112.7(k)	<a href="#">3.3 Potential Discharge Volumes and Direction of Flow</a>	<a href="#">13</a>
112.8(b)	<a href="#">3.4 Containment Drainage</a>	<a href="#">14</a>
112.8(c)(1)	<a href="#">2.3 Oil Storage</a>	<a href="#">10</a>
112.8(c)(2)	<a href="#">3.5 Containment and Diversionary Structures</a>	<a href="#">14</a>
112.8(c)(3)	<a href="#">3.4 Containment Drainage</a>	<a href="#">14</a>
112.8(c)(6)	<a href="#">3.7 Inspections, Tests, and Records</a>	<a href="#">15</a>
112.8(c)(8)	<a href="#">3.5 Containment and Diversionary Structures</a>	<a href="#">14</a>
112.8(c)(10)	<a href="#">3.7 Inspections, Tests, and Records</a>	<a href="#">15</a>
112.8(d)	<a href="#">3.7 Inspections, Tests, and Records</a>	<a href="#">15</a>

**Table 1-2: SPCC Cross Reference**

Provision	Plan Section	Page
112.20(e)	<a href="#">Certification</a>	29
112.20(f)2(i)	<a href="#">2.4 Discharge Potential</a>	12

### Oil Contingency Plan Cross-Reference

This SPCC Plan does not follow the exact order presented in 40 CFR Part 109.5 for Oil Contingency Plans. The table below presents a cross-reference of Plan sections relative to the applicable parts of 40 CFR Part 109.5.

**Table 1-3: Oil Contingency Plan Cross-Reference**

Provision	Plan Section	Page
109.5(a)	<a href="#">3.9 Security</a>	31
109.5(b)(1)	<a href="#">2.3 Oil Storage</a>	10
109.5(b)(2)	<a href="#">Certification</a>	29
109.5(b)(3)	<a href="#">4.4 Discharge Notification</a>	21
109.5(b)(4)	<a href="#">4.4 Discharge Notification</a>	21
109.5(c)(1)	<a href="#">3.6 Practicability of Secondary Containment</a>	15
109.5(c)(2)	<a href="#">3.4 Containment Drainage</a>	14
109.5(c)(3)	<a href="#">3.9 Security</a>	17
109.5(d)(1)	<a href="#">3.9 Security</a>	17
109.5(d)(2)	<a href="#">3.9 Security</a>	17
109.5(d)(3)	<a href="#">2.1 Description of the Facility</a>	8
109.5(d)(4)	<a href="#">4.0 DISCHARGE RESPONSE</a>	19
109.5(d)(5)	<a href="#">2.3 Oil Storage</a>	10
109.5(e)	<a href="#">3.12 Conformance with State and Local Applicable Requirements</a>	19



## 2.0 GENERAL FACILITY INFORMATION

### 2.1 Description of the Facility

**Table 2-1: Facility Information**

<b>Owner Information</b>	
Owner Legal Entity	Apex Clean Energy, Inc.
Owner Best Contact	Tharon Anderson
Address	310 4th Street Northeast, Suite 200, Charlottesville, VA 22902
Owner Best Contact Phone and Email	918-671-0988; tharon.anderson@apexcleanenergy.com
<b>Operator Information</b>	
General Contractor Company	Fagen, Inc.
General Contractor On-Site Representative	Brian Clore
Address	501 West Highway 212, Granite Falls, MN 56241
General Contractor Phone; On-site Manager Email	507-829-6235; bclore@fageninc.com
<b>Facilities Include:</b>	
Laydown Yard	12 Acres
Substation	3 Acres
Remote Sites	138 padmount transformers
<b>Facility</b>	
Facility Address	1656 East Rosebush Road, Rosebush, MI 48878

The Facilities are located in Isabella and Midland Counties, Michigan and include a temporary Laydown Yard, a Substation, and remotely-located padmount transformers ("Remote Sites"). Together, these three (3) areas are collectively known as the "Facilities." The Facility defined by this SPCC Plan consists of the distinct areas that contain oil products and/or oil storage described above in [Section 1.1](#). Construction activity will disturb an area consisting of approximately 1,890 acres consisting of both temporary and permanent improvements. Hours of operation for the Facility are typically between 7:00 AM to 5:30 PM Monday through Saturday.

The majority of the contaminants will be stored at the temporary construction Laydown Yard where oil products are stored in several aboveground storage tanks (ASTs) for use during construction. The Laydown Yard will consist of construction trailers that are used by

Apex, Fagen, and other subcontractors. An aggregate surface will be installed for the Facility to be used for storage, supplies, and equipment. Oil products at the Laydown Yard will primarily be found in ASTs and mobile refuelers used by the Operator and its subcontractors primarily to store fuel and other vehicle fluids. A fuel truck will be used to transport fuel from the Laydown Yard to the construction equipment as needed. The Laydown Yard will serve as the Facility operations center during construction and will be equipped with a reliable communications center for directing response operations. Access to the Laydown Yard is off East Rosebush Road between North Lincoln Road and North Whiteville Road.

The Substation will consist of a main power transformer, associated control and distribution equipment, an underground electrical transmission system for the turbines, an aggregate surface, and a fence that surrounds the perimeter of the Substation. The Substation will initially consist of mass grading the area to create a relatively flat pad for the proposed infrastructure. During this time, equipment will consist of loaders, scrapers, dozers, etc. to move earth around the site. Next, crews will construct foundations and the metal structures that house the electrical system, the main power transformer, and a concrete pit used as secondary containment for the main power transformer. Finally, the electrical conduit will be installed and connected to the various components. A fence and final aggregate surface will be installed at the completion of the construction. The main power transformer will contain the majority of the potential oil contaminates at the Substation. Access to the Substation is off East Weidman Road between North Crawford Road and Old U.S. Highway 27.

The Remote Sites will consist of 138 remotely-located padmount transformers throughout the project, which will all contain oil.

Locations of all of the Facilities are shown in the [Facility Location Figures](#).

## 2.2 Administration of Responsibility

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

### Owner Legal Entity

Apex is the owner of the Isabella Wind project. Apex has engaged Fagen as the General Contractor for the Project. Owner's responsibilities include:

- Ensure those who work with oil on the Project are aware of and follow the requirements of this SPCC Plan;
- Follow the established policies and procedures of this SPCC Plan; and
- Enforce the requirements of the SPCC Plan and have overall responsibility of the Project and SPCC Plan requirements.

"Leave as is."

## General Contractor Company

Fagen is the General Contractor for the construction of the Isabella Wind. Fagen is responsible for the construction of [insert general contractor scope]. Fagen will engage an oil company to supply fuel for the project. Specific responsibilities include:

- Serve as SPCC Emergency Coordinator;
- Perform inspections to ensure compliance with the provisions of this SPCC Plan;
- Coordinate training and maintain training records;
- Maintain the SDS sheets;
- Maintain security of oil storage areas;
- Notify the Owner of any releases;
- Investigate oil releases;
- Provide the proper notification for environmental releases;
- Ensure corrective action is taken in the event of a release;
- Coordinate disposal of waste materials;
- Ensure that emergency response equipment is available and working properly; and
- Update the SPCC Plan as required.

## Subcontractors

Subcontractors will be selected for the construction of [insert subcontractor scope]. Subcontractor responsibilities include:

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

### 2.3 Oil Storage

The Contractor shall use storage containers that are compatible with the material stored within considering pressure and temperature.

Bulk oil storage at the Facility consists of numerous fixed ASTs, mobile refuelers, the main power transformer, and various padmount transformers. An inventory of the products stored at the Facility is shown below. All containers with a capacity of fifty-five (55) gallons or more are included, unless otherwise exempt from the rule.

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

access roads and collection system.

the tower installation of 136 turbines.

**Table 2-2: Oil Storage Inventory**

Capacity (gallons)	Quantity	Content	Storage Containment	Secondary Containment	Party Responsible for Oil Storage
<b>Laydown Yard</b>					
1,000	4	Off-road Diesel	Aboveground Storage Tank	Double-walled	Fagen
1,000	1	Unleaded Gas	Aboveground Storage Tank	Double-walled	Fagen
500	1	Diesel	Aboveground Storage Tank	Double-walled	Fagen
100	2	Off-road Diesel	Mobile Refueler	Active Containment/ Sorbent Materials	Fagen
100	2	Unleaded Gas	Mobile Refueler	Active Containment/ Sorbent Materials	Fagen
90	9	Off-road Diesel	Mobile Refueler	Active Containment/ Sorbent Materials	Fagen
500	1	Unleaded Gas	Aboveground Storage Tank	Double-walled	Fagen
75	10	Diesel	Mobile Refueler	Active Containment/ Sorbent Materials	Fagen
<b>Substation</b>					
17,160	1	Mineral Oil	Main Power Transformer		Fagen
<b>Remote Sites</b>					
701	138	Mineral Oil	Padmount Transformer	Active Containment/ Sorbent Materials	Fagen

Quantity - 2

## 2.4 Discharge Potential

The overall project area is divided between sixteen (16) major receiving waterbodies: Schofield Creek, North Branch Chippewa River, Hagerman Drain, Hogg Creek, McDonald Drain, Menery Drain, Curtis Drain, Sharps Drain, Killenbeck Drain, North Branch Salt River, McKay Drain, Jordan Creek, Spring Creek, Welnack Drain, South Branch Salt River, and High Drain. These receiving waterbodies fall within two (2) primary watersheds: Tittabawassee and Pine. The Facility has multiple discharge points to the receiving waters, but the runoff directly from the disturbed areas is generally non-point discharges via overland flow. Due to the remote nature and large quantity of padmount transformers, drainage patterns vary for each transformer site. However, it is unlikely that simultaneous discharges will occur at multiple transformer sites. If a discharge reaches a navigable water, the priority is to control it before it discharges downstream to other water uses. Point discharge locations are noted below and are located within the drainage areas shown on [Figure 2](#). The named receiving watersheds are:

**Tittabawassee:** This watershed receives 926,365 acres of overland drainage and ultimately drains into the Tittabawassee River that runs to the east of the site. This watershed contains the Laydown Yard, Substation, and various padmount transformers. The Laydown Yard and Substation are located on relatively flat terrain and consist of a compacted gravel surface. Drainage generally flows northwest within the Laydown Yard and drains via overland flow to an unnamed tributary of Spring Creek approximately 167 feet northwest of the Laydown Yard. Drainage generally flows northwest and southeast within the Substation and drains via overland flow to an unnamed tributary of Jordan Creek approximately sixty (60) feet northwest of the Substation. Drainage from the various remote padmount transformers varies depending upon the individual locations of the transformers.

**Pine:** This watershed receives 656,390 acres of overland drainage and ultimately drains into the Pine River that runs to the south of the site. This watershed contains various padmount transformers. Drainage from the various remote padmount transformers varies depending upon the individual locations of the transformers.

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

## 3.0 DISCHARGE PREVENTION

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

### 3.1 Facility Layout Diagram and Remote Sites

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

### 3.2 Spill Reporting Procedures

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

### 3.3 Potential Discharge Volumes and Direction of Flow

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

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

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

Potential Event	Maximum Volume Released (Gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
<b>Laydown Yard</b>				
Tank Overfill	90	1 gal/min*	Northwest	
Hose Leak During Unloading	90	1 gal/min*	Northwest	
Dispenser Hose Rupture	90	1 gal/min*	Northwest	
Tank Rupture	1,000 (max tank value)	Gradual to Instantaneous	Northwest	Double-walled
Mobile Refueler Rupture	100 (max tank value)	Gradual to Instantaneous	Northwest	Active Containment/ Sorbent Materials
<b>Substation</b>				
Main Power Transformer Rupture	17,160	Gradual to Instantaneous	Northwest/ Southeast	
<b>Remote Sites</b>				
Padmount Transformer Rupture	701	Gradual to Instantaneous	Varies	Active Containment/ Sorbent Materials

"Leave as is."



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

Potential Event	Maximum Volume Released (Gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
<p><b>*Assumes a maximum of 1.5 hours before discovery. In the event of a complete tank rupture, a maximum of 90 gallons could potentially be released before facility response personnel are able to mitigate the discharge. The large spill kits at the Laydown Yard (absorption capacity of XX gallons) as well as the readily-available small spill kits in on-site vehicles (absorption capacity of XX gallons) would be sufficient to clean up an oil spill of this size.</b></p>				

Medium Spill Kit - 55-gal. drum  
Absorption Capacity -41 gallons

We contact our spill contractor to drain the tubs.

### 3.4 Containment Drainage

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

### 3.5 Containment and Diversionary Structures

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

### Double-walled Tanks

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

### Tubs, Totes, Pits, and Earthen Berms

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

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

"Leave as is."

## Drip Pans

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

## Sorbent Material

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

### 3.6 Practicability of Secondary Containment

It has been determined that secondary containment is practicable at this facility for the ASTs at the Laydown Yard and the **main power transformer at the Substation**. In lieu of providing sized secondary containment for the mobile refuelers at the Laydown Yard and padmount transformers at the Remote Sites, this SPCC Plan meets the requirements of an Oil Contingency Plan as an Alternative Requirement to General Secondary Containment as set forth in 40 CFR 112.7(k)(2). The additional Oil Contingency Plan establishes the procedures for preventing, detecting, and responding to equipment failure and/or discharges. The Oil Contingency Plan meets the requirements set forth in 40 CFR 109.5.

### 3.7 Inspections, Tests, and Records

Visual inspections of tanks and containment areas are conducted monthly. Inspection of the outside of the container for signs of deterioration, discharges, or accumulation of oil inside containment areas is conducted.

#### 3.7.1 Monthly Inspections

The monthly inspection checklist is provided in [Appendix G](#). The monthly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning;
- Observing the exterior of portable containers for signs of deterioration or leaks;
- Observing the tank fill and discharge pipes and hoses for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation;
- Verifying the proper functioning of overfill prevention systems; and
- Checking the inventory of discharge response equipment and restocking as needed.

Each aboveground tank will be tested for integrity on a regular schedule and whenever

material repairs are made. The regulations require visual inspections combined with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. For small, non-regulated aboveground tanks, such as those in use at the Facility, the testing can be substituted by a more detailed visual inspection in accordance with the Steel Tank Institute (STI) Standard for the Inspection of Aboveground Storage Tanks, SP-001, latest version ([Appendix G](#)). This inspection will be performed annually.

Visual inspection is considered sufficient for bulk oil storage. The containers are visually examined on a daily basis (cursory observations) and monthly basis (written inspection) for signs of deterioration or leaks and are immediately replaced if signs of deterioration or leaks are apparent.

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

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

All problems regarding tanks, piping, containment, or response equipment will be immediately reported to the SPCC Emergency Coordinator listed in [Section 1.3](#). Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or discharge to navigable waters or adjoining shorelines. Pooled oil shall be removed immediately upon discovery.

### **3.8 Personnel, Training, and Discharge Prevention Procedures**

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

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

Records of the briefing and discharge prevention training shall be kept on the form contained in

[Appendix H](#) and maintained with this SPCC Plan for a period of three (3) years from the briefing/training date.

### 3.9 Security

Fencing is generally not provided at the Facility. Instead, environmental equivalent protection is being provided by the temporary nature of the construction, the remote locations, full-time Facility personnel at the Laydown Yard Monday through Saturday 7:00 AM to 5:30 PM, security guards, and locked storage tanks at night. Pole lighting will be installed around the yard. Security will be present whenever the Contractor is not present on site (normally nights on weekdays and twenty-four (24) hours on the weekends).

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

### 3.10 Loading/Unloading

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

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

**Table 3-2: Fuel Transfer Procedures**

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

**Table 3-2: Fuel Transfer Procedures**

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

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

<b>After Loading/ Unloading</b>	
	Make sure the transfer operation is complete.
	Close all tank and loading valves before disconnecting.
	Secure all hatches.
	Disconnect all grounding/bonding wires from the bulk fuel transfer point.
	Make sure the hoses are drained to remove remaining oil before moving them away from the connection. Use a drip pan.
	Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.
	Inspect the lowest drain and other outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.
	Inspect the loading/unloading point and tank to verify that no leaks have occurred or that any leaked or spilled material has been cleaned up and disposed of properly.

### **3.11 Brittle Fracture Evaluation**

There are no field constructed tanks at the Facility.

### **3.12 Conformance with State and Local Applicable Requirements**

Each responsible Owner or Operator at the Facility is required to get all necessary tanks approved, registered, and permitted with applicable Federal, State, and Local agencies, including the Michigan State Fire Marshal and the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Pollution Emergency Alerting System (PEAS) hotline.

Any discharges of oil that violate applicable water quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines must immediately be reported to the EGLE PEAS hotline (800-292-4706) and the Local Emergency Planning Committee (LEPC) regional contact (McCarthy Griffis; 989-773-6116). Oils as defined in the Clean Water Act (CWA) Section 311 40 CFR 110 include oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.

Any unpermitted release of oil directly or indirectly to a public sewer system, surface of ground, surface water, or groundwater from an oil storage facility or on-land facility that is in excess of the threshold Reportable Quantity (RQ) during any twenty-four (24) hour period must be reported to the EGLE PEAS hotline (800-292-4706) and the LEPC (McCarthy Griffis; 989-773-6116) as soon as practicable after detection. Following verbal reporting of the release, a written report must be filed within ten (10) days after the release to the EGLE Water Resources Division (WRD) district supervisor as well as the local health department where the release occurred outlining the cause, discovery, response, and prevention of recurrence. The written report must contain all information that is included in the discharge notification form in [Appendix D](#). Refer to [Section 4.4](#) for Discharge Notification requirements.

## **4.0 DISCHARGE RESPONSE**

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

In general, the following steps shall be taken:

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



- Ensure refuse materials are hauled off by a permitted hauler to a permitted facility.

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

A list of Emergency Contacts is provided in [Appendix C](#). This list identifies personnel to be contacted in case of emergency and shall be posted on the information board in the Laydown Yard.

#### **4.1 Response to a Minor Discharge**

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

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

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

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

#### **4.2 Response to a Major Discharge**

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

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

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

- Safety of personnel is the primary concern. No countermeasures that risk the health or safety of personnel should be undertaken;
- If the SPCC Emergency Coordinator is not present at the Facility, the senior on-site person shall notify the SPCC Emergency Coordinator of the discharge and has the authority to initiate notification and response;

- No smoking, open flames, cell phones, or other spark-inducing equipment is permitted in the area of a flammable material spill;
- Facility personnel should stop the source of the leak or spill if possible by closing a valve, turning off a pump, sealing a hole, etc. Facility personnel should take the following actions to contain the spill: use absorbent pads, booms, sand, and/or speedi-dri materials to stop the spread of the spill. Contaminated soil should be placed on an impermeable liner for containment;
- Emergency medical treatment and first aid shall be administered by personnel certified in first aid/CPR. The SPCC Emergency Coordinator (or senior on-site person) must call for medical assistance if workers are injured;
- Establish fire prevention measures in the vicinity of the spill. Divert traffic (vehicular and pedestrian) from the area. The SPCC Emergency Coordinator (or senior on-site person) must call the local Fire Department or Police Department;
- If Facility personnel are unsure of the hazards involved, the amount of the spill is too large, or a release to navigable waters or adjoining shorelines is threatened, the SPCC Emergency Coordinator (or senior on-site person) shall call for outside assistance from a spill response/cleanup contractor;
- The SPCC Emergency Coordinator (or senior on-site person) will call the National Response Center (800-424-8802) immediately (within fifteen (15) minutes), the LEPC (McCarthy Griffis; 989-773-6116), and the EGLE PEAS hotline (800-292-4706);
- The SPCC Emergency Coordinator (or senior on-site person) will complete the discharge notification form in [Appendix D](#) and attach a copy to this SPCC Plan; and
- The SPCC Emergency Coordinator (or senior on-site person) will coordinate cleanup and contract a cleanup contractor as necessary.

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

### 4.3 Waste Disposal

Waste resulting from a minor discharge response will be contained in impervious bags, drums, or buckets. The SPCC Emergency Coordinator will characterize the waste for proper disposal and ensure it is removed from the Facility by a licensed waste hauler.

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

Fagen has contracted with **SPILL CONTRACTOR COMPANY (SPILL CONTRACTOR PHONE NUMBER)** in the event that hazardous material needs to be removed from the site.

### 4.4 Discharge Notification

The individual identifying the release shall immediately contact the facility SPCC Emergency Coordinator. The SPCC Emergency Coordinator or designee will be responsible for notifying the appropriate regulatory agencies and, if necessary, the spill clean-up contractor. Any size

Safety-Kleen (989-753-3261)

discharge that affects or threatens to affect navigable waters (i.e. one that creates an oil film, sheen, emulsion, or sludge upon navigable waters or adjoining shorelines) must be reported immediately (within fifteen (15) minutes) to the National Response Center (800-424-8802). The National Response Center is staffed twenty-four (24) hours a day.

Any discharges of oil that violate applicable water quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines must immediately be reported to the EGLE PEAS hotline (800-292-4706) and the LEPC regional contact (McCarthy Griffis; 989-773-6116).

Any unpermitted release of oil directly or indirectly to a public sewer system, surface of ground, surface water, or groundwater from an oil storage facility or on-land facility that is in excess of the threshold RQ during any twenty-four (24) hour period must be reported to the EGLE PEAS hotline (800-292-4706) and the LEPC (McCarthy Griffis; 989-773-6116) as soon as practicable after detection. Following verbal reporting of the release, a written report must be filed within ten (10) days after the release to the EGLE WRD district supervisor as well as the local health department where the release occurred outlining the cause, discovery, response, and prevention of recurrence. The written report must contain all information that is included in the discharge notification form in [Appendix D](#).

In addition, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator for Region 5 (312-353-2000) and the appropriate state agency in charge of oil pollution control activities — in this case, the EGLE PEAS hotline (800-292-4706) — whenever the Facility discharges more than 1,000 gallons of oil to a navigable water in a single event or discharges more than forty-two (42) gallons of oil to navigable waters in each of two (2) discharge incidents within a twelve (12) month period.

Contact information for reporting the discharge to the appropriate authorities is listed in [Appendix C](#) and is also posted at the information board in the Laydown Yard.

A summary sheet is included in [Appendix D](#) to facilitate the reporting. The person reporting the discharge will provide the following information:

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

- Any other information that may help emergency personnel respond to the incident.

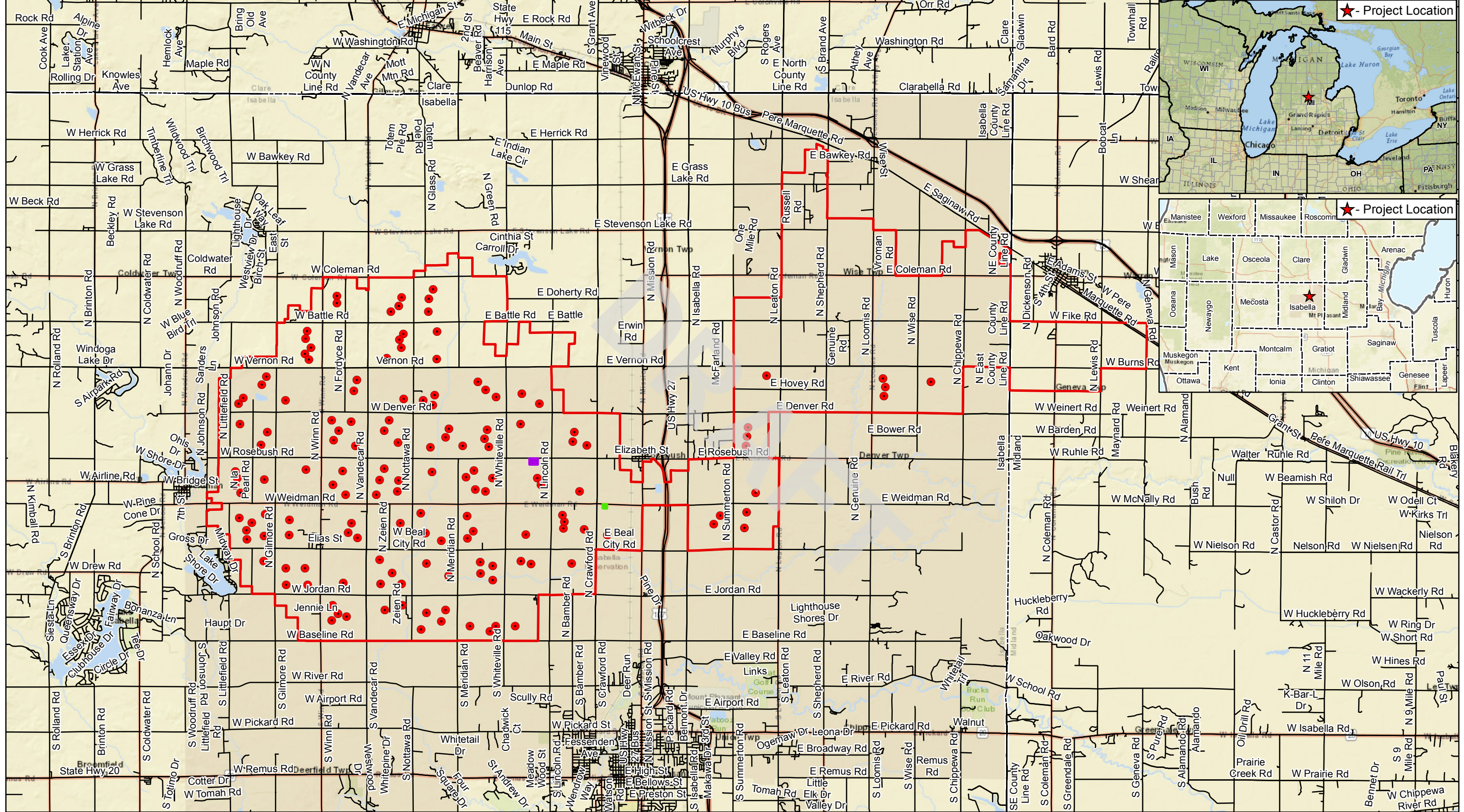
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**FACILITY LOCATION  
FIGURES**

DRAFT





Data Sources: Westwood (2019); Esri WMS Basemap Imagery (Accessed 2019); USGS (2019); FEMA (2019); USDA (2019)

### Legend

- Project Boundary
- County Boundary
- Substation
- Laydown Yard
- Existing Road
- Turbine Array



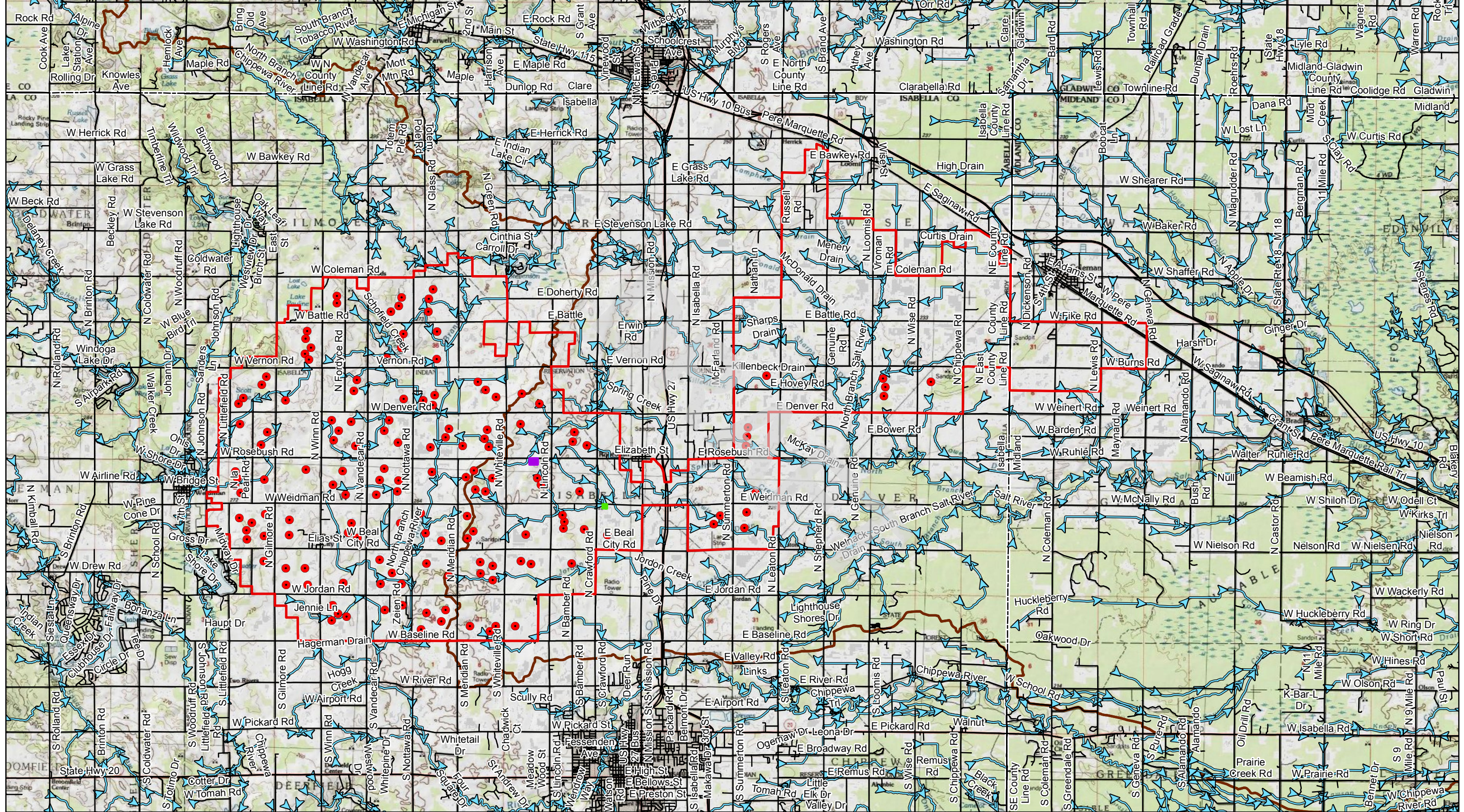
## Isabella Wind Farm

Isabella and Midland Counties, Michigan

Figure 1: Vicinity Map

September 4, 2019





Data Sources: Westwood (2019); Esri WMS Basemap Imagery (Accessed 2019); USGS (2019); FEMA (2019); USDA (2019)

### Legend

- Project Boundary
- County Boundary
- HUC 8 Boundary
- Substation
- Laydown Yard
- Turbine Array
- Existing Road
- NHD Flowline



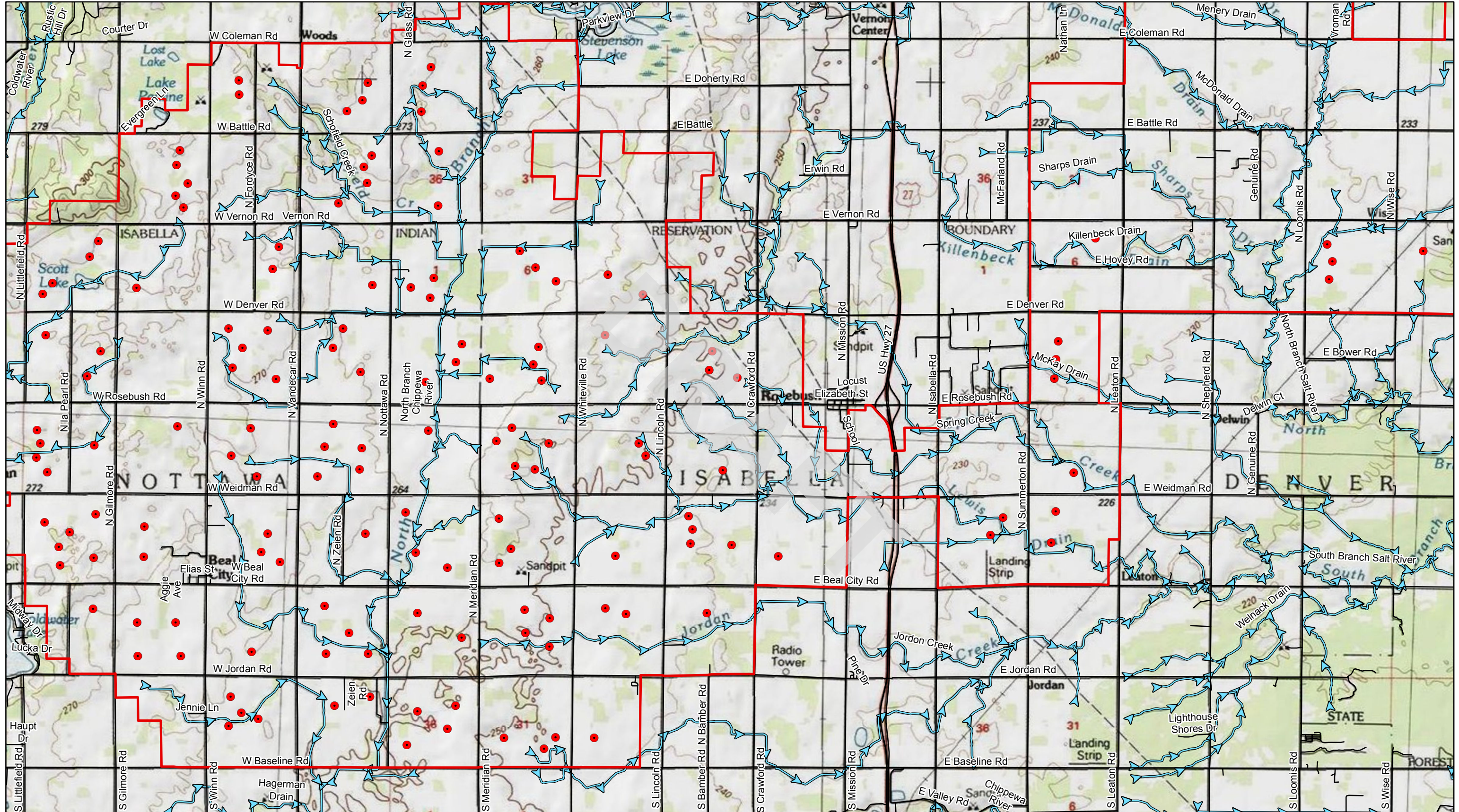
## Isabella Wind Farm

Isabella and Midland Counties, Michigan

Figure 2: Drainage Map

September 4, 2019





Data Sources: Westwood (2019); Esri WMS Basemap Imagery (Accessed 2019); USGS (2019); FEMA (2019); USDA (2019)

### Legend

- Project Boundary
- Existing Road
- Turbine Array
- County Boundary
- NHD Flowline



## Isabella Wind Farm

Isabella and Midland Counties, Michigan

Figure 3: Remote Sites Layout Map

September 4, 2019

Map Document: N:\0014171\_00\GIS\SPCC\Exhibits\2019-09-04\_Isabella\_SFCC\_Ex3\_RemoteSitesMap.mxd 9/4/2019 9:58:51 AM



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## **APPENDICES**

**APPENDIX A: SUBSTANTIAL HARM DETERMINATION**

Facility Name: Isabella Wind

Facility Address: 1656 East Rosebush Road, Rosebush, MI 48878

**Substantial Harm Determination**

Does the Facility transfer oil over water to or from vessels and does the Facility have a total oil storage capacity greater than or equal to 42,000 gallons?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and does the Facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and is the Facility located at a distance (as calculated using the appropriate formula in 40 CFR Part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the Facility could cause injury to fish and wildlife and sensitive environments?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and is the Facility located at a distance (as calculated using the appropriate formula in 40 CFR Part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the Facility would shut down a public drinking water intake?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and has the Facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?	No

**Certification**

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

Signature & Date	
Printed Name	
Company and Title	

**APPENDIX B: PLAN REVIEW LOG**

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

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

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

<b>Review Date</b>	<b>SPCC Plan Amendment</b>	<b>Name and Signature of Person Authorized to Review This SPCC Plan</b>

**Technical Amendment Log**

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

Technical Amendment Log

<b>Review Date</b>	<b>Description of Technical Amendment</b>	<b>Name and Signature of Person Certifying This Technical Amendment</b>

**APPENDIX C: EMERGENCY CONTACTS**

**EMERGENCY CONTACTS**

Person responsible for spill prevention: Brian Clore, Fagen, Inc. Project Manager

**EMERGENCY TELEPHONE NUMBERS**

<b>Facility:</b>	
Brian Clore, Fagen, Inc. Project Manager	507-829-6235 501 West Highway 212, Granite Falls, MN 56241
Christopher Adames, Fagen, Inc. Project Engineer	320-226-8787 501 West Highway 212, Granite Falls, MN 56241
Tharon Anderson, Apex Clean Energy, Inc. Site Manager	918-671-0988 310 4th Street Northeast, Suite 200, Charlottesville, VA 22902
<b>Designated Spill Contractor:</b>	
<b>SPILL CONTRACTOR CONTACT, SPILL CONTRACTOR COMPANY</b>	<b>SPILL CONTRACTOR PHONE NUMBER SPILL CONTRACTOR ADDRESS</b>
<b>Local Emergency Response:</b>	
Isabella County 911	911
Midland County 911	911
Isabella County Sheriff	989-772-5911 207 Court Street, Mt. Pleasant, MI 48858
Midland County Sheriff	989-839-4600 2727 Rodd Street, Midland, MI 48640
Mt. Pleasant Fire Department	989-779-5100 804 East High Street, Mt. Pleasant, MI 48858
<b>Notification:</b>	
National Response Center	800-424-8802
U.S. Environmental Protection Agency, Region 5	312-353-2000 Ralph Metcalfe Federal Building, 77 West Jackson Blvd., Chicago, IL 60604
Michigan Department of Environment, Great Lakes, and Energy Pollution Emergency Alerting System hotline	800-292-4706 or 800-621-8431

Karen Downland, Safety-Kleen

989-753-3261, 3899 Wolf Road  
Saginaw, MI 48601

McCarthy Griffis, Isabella County Local Emergency Planning Committee	989-773-6116 2008 East Preston, Mt. Pleasant, MI 48858
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**APPENDIX D: DISCHARGE NOTIFICATION FORM****Discharge Notification Form**

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

**Discharge Information**

Facility Name:	Isabella Wind
Address:	1656 East Rosebush Road Rosebush, MI 48878
Telephone:	507-829-6235
Operator:	Fagen, Inc.
Primary Contact:	Brian Clore, Project Manager 507-829-6235
Discharge Date:	Discharge Time:
Weather Conditions and Temperature:	
Name of reporting individual:	
Type of material:	
Quantity released:	
Estimated quantity released to navigable waters:	
Cause of discharge:	
Action taken to stop, remove, and mitigate the effects of the discharge:	
Media affected:	



**Damages or Injuries**


**Organizations and Individuals Contacted**

	Fire/Police/Ambulance	911	Time:
	Mt. Pleasant Fire Department	989-779-5100	Time:
	National Response Center	800-424-8802	Time:
	U.S. Environmental Protection Agency, Region 5	312-353-2000	Time:
	Michigan Department of Environment, Great Lakes, and Energy Pollution Emergency Alerting System hotline	800-292-4706 or 800-621-8431	Time:
	McCarthy Griffis, Isabella County Local Emergency Planning Committee	989-773-6116	Time:

**Signature**

Signature	
Printed Name	
Company & Title	



# SPILL OR RELEASE REPORT

Issued by authority of the Michigan Department of Environmental Quality.

**NOTE:** Some regulations require a specific form to use and procedures to follow when reporting a release. Those forms and procedures **MUST** be used and followed if reporting under those regulations. This report form is to aid persons reporting releases under regulations that do not require a specific form. This report form is not required to be used. **To report a release, some regulations require a facility to call the PEAS Hotline at 800-292-4706 (or the DEQ District Office that oversees the county where it occurred) and other agencies and provide information that is included in this form. A written follow-up report might be required. This form may be used for the written follow-up report and to document the initial report. If you prefer to submit this report electronically by FAX or e-mail, contact the regulating agency for the correct telephone number or e-mail address. Go to [www.michigan.gov/chemrelease](http://www.michigan.gov/chemrelease) for more information.**

**Please print or type all information.**

Name and Title of Person Submitting Written Report		Telephone Number (provide area code) (      )		
Name of Business		<b>RELEASE LOCATION</b> (Provide address if different than business, if known, and give directions to the spill location. Include nearest highway, town, road intersection, etc.)		
Street Address				
City, State, ZIP				
Business Telephone Number (provide area code) (      )				
<b>SITE IDENTIFICATION NUMBER AND OTHER IDENTIFYING NUMBERS</b> (if applicable)		County	Township	Tier/Range/Section (if known)

**RELEASE DATA:** Complete all applicable categories. Check all the boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary.

<b>DATE &amp; TIME OF RELEASE</b> (if known) ____/____/____ am/pm	<b>DATE &amp; TIME OF DISCOVERY</b> ____/____/____ am/pm	<b>DURATION OF RELEASE</b> (if known) ____ days ____ hours ____ minutes	<b>TYPE OF INCIDENT</b> <input type="checkbox"/> Explosion <input type="checkbox"/> Fire <input type="checkbox"/> Leaking container <input type="checkbox"/> Other _____	<input type="checkbox"/> Loading/unloading release <input type="checkbox"/> Pipe/valve leak or rupture <input type="checkbox"/> Vehicle accident
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<b>MATERIAL RELEASED</b> (chemical or trade name) <input type="checkbox"/> CHECK HERE IF ADDITIONAL MATERIALS LISTED ON ATTACHED PAGE.	<b>CAS NUMBER OR HAZARDOUS WASTE CODE</b>	<b>ESTIMATED QUANTITY RELEASED</b> (indicate unit e.g. lbs, gals, cu ft or yds)	<b>PHYSICAL STATE RELEASED</b> (indicate if solid, liquid, or gas)
_____	_____	_____	_____

<b>FACTORS CONTRIBUTING TO RELEASE</b> <input type="checkbox"/> Equipment failure <input type="checkbox"/> Operator error <input type="checkbox"/> Faulty process design <input type="checkbox"/> Training deficiencies <input type="checkbox"/> Unusual weather conditions <input type="checkbox"/> Other _____	<b>SOURCE OF LOSS</b> <input type="checkbox"/> Container <input type="checkbox"/> Railroad car <input type="checkbox"/> Pipeline <input type="checkbox"/> Ship <input type="checkbox"/> Tank <input type="checkbox"/> Other _____ <input type="checkbox"/> Tanker <input type="checkbox"/> Truck
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<b>TYPE OF MATERIAL RELEASED</b> <input type="checkbox"/> Agricultural: manure, pesticide, fertilizer <input type="checkbox"/> Chemicals <input type="checkbox"/> Flammable or combustible liquid <input type="checkbox"/> Hazardous waste <input type="checkbox"/> Liquid industrial waste <input type="checkbox"/> Oil/petroleum products or waste <input type="checkbox"/> Salt <input type="checkbox"/> Sewage <input type="checkbox"/> Other _____ <input type="checkbox"/> Unknown	<b>MATERIAL LISTED ON OR DEFINED BY</b> <input type="checkbox"/> CAA Section 112(r) list (40 CFR Part 68) <input type="checkbox"/> CERCLA Table 302.4 (40 CFR Part 302) <input type="checkbox"/> EPCRA Extremely Hazardous Substance (40 CFR Part 355) <input type="checkbox"/> NREPA Part 31, Part 5 Rules polluting material <input type="checkbox"/> NREPA Part 111 or RCRA hazardous waste <input type="checkbox"/> NREPA Part 121 liquid industrial waste <input type="checkbox"/> Other list _____ <input type="checkbox"/> Unknown	<b>IMMEDIATE ACTIONS TAKEN</b> <input type="checkbox"/> Containment <input type="checkbox"/> Dilution <input type="checkbox"/> Evacuation <input type="checkbox"/> Hazard removal <input type="checkbox"/> Neutralization <input type="checkbox"/> System shut down <input type="checkbox"/> Other _____ <input type="checkbox"/> Diversion of release to treatment <input type="checkbox"/> Decontamination of persons or equipment <input type="checkbox"/> Monitoring
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<b>RELEASE REACHED</b> <input type="checkbox"/> Surface waters (include name of river, lake, drain involved) _____ <input type="checkbox"/> Drain connected to sanitary sewer (include name of wastewater treatment plant and/or street drain, if known) _____ <input type="checkbox"/> Drain connected to storm sewer (include name of drain or water body it discharges into, if known) _____ <input type="checkbox"/> Groundwater (indicate if it is a known or suspected drinking water source and include name of aquifer, if known) _____ <input type="checkbox"/> Soils (include type e.g. clay, sand, loam, etc.) _____ <input type="checkbox"/> Ambient Air <input type="checkbox"/> Spill contained on impervious surface	Distance from spill location to surface water, in feet _____
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<b>EXTENT OF INJURIES</b> (if any)	<b>WAS ANYONE HOSPITALIZED?</b> <input type="checkbox"/> Yes Number Hospitalized: _____ <input type="checkbox"/> No	<b>NUMBER OF INJURIES TREATED ON SITE</b>
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Describe the incident, the type of equipment involved in the release, how the volume of loss was determined, along with any resulting environmental damage caused by the release. Identify who immediately responded to the incident (own employees or contractor — include cleanup company name, contact person, and telephone number). Also identify who did further cleanup activities if performed or known when report submitted.

CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

Estimated quantity of any recovered materials and a description of how those materials were managed (include disposal method if applicable)

CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

Assessment of actual or potential hazards to human health (Include known acute or immediate and chronic or delayed effects, and where appropriate, advice regarding medical attention necessary for exposed individuals.)

CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE

<p><b>MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFIED:</b></p> <p><b>INITIAL CONTACT BY:</b> <input type="checkbox"/> Telephone <input type="checkbox"/> FAX <input type="checkbox"/> Email <input type="checkbox"/> Other</p> <p><b>DATE/TIME INITIAL CONTACT:</b> _____</p> <p><input type="checkbox"/> PEAS: 800-292-4706 Log Number Assigned _____</p> <p><input type="checkbox"/> DEQ District or Field Office Divisions or Offices Contacted:</p> <table style="width:100%; border: none;"> <tr> <td><input type="checkbox"/> Bay City</td> <td><input type="checkbox"/> Gwinn</td> <td><input type="checkbox"/> Air Quality</td> </tr> <tr> <td><input type="checkbox"/> Cadillac</td> <td><input type="checkbox"/> Jackson</td> <td><input type="checkbox"/> Remediation</td> </tr> <tr> <td><input type="checkbox"/> Calumet</td> <td><input type="checkbox"/> Kalamazoo</td> <td><input type="checkbox"/> Office Geological Survey</td> </tr> <tr> <td><input type="checkbox"/> Crystal Falls</td> <td><input type="checkbox"/> Lansing</td> <td><input type="checkbox"/> Water Resources</td> </tr> <tr> <td><input type="checkbox"/> Detroit</td> <td><input type="checkbox"/> Newberry</td> <td><input type="checkbox"/> Resource Management</td> </tr> <tr> <td><input type="checkbox"/> Gaylord</td> <td><input type="checkbox"/> Warren</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Grand Rapids</td> <td></td> <td></td> </tr> </table> <p><b>NOTE:</b> DEQ Office locations are subject to change</p> <p><b>NAME AND TITLE OF PERSON MAKING INITIAL REPORT:</b></p> <p>_____</p> <p><b>DEQ STAFF CONTACTED &amp; TELEPHONE NUMBER:</b></p> <p>_____</p> <p>_____</p>	<input type="checkbox"/> Bay City	<input type="checkbox"/> Gwinn	<input type="checkbox"/> Air Quality	<input type="checkbox"/> Cadillac	<input type="checkbox"/> Jackson	<input type="checkbox"/> Remediation	<input type="checkbox"/> Calumet	<input type="checkbox"/> Kalamazoo	<input type="checkbox"/> Office Geological Survey	<input type="checkbox"/> Crystal Falls	<input type="checkbox"/> Lansing	<input type="checkbox"/> Water Resources	<input type="checkbox"/> Detroit	<input type="checkbox"/> Newberry	<input type="checkbox"/> Resource Management	<input type="checkbox"/> Gaylord	<input type="checkbox"/> Warren		<input type="checkbox"/> Grand Rapids			<p><b>OTHER ENTITIES NOTIFIED:</b></p> <table style="width:100%; border: none;"> <thead> <tr> <th style="width:80%;"></th> <th style="width:10%; text-align: center;">Date:</th> <th style="width:10%; text-align: center;">Time:</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/> National Response Center (NRC): 800-424-8802</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td><input type="checkbox"/> US Coast Guard Office:</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td style="padding-left: 20px;"><input type="checkbox"/> Detroit <input type="checkbox"/> Grand Haven <input type="checkbox"/> Sault Ste. 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<input type="checkbox"/> Other _____	_____	_____																																																																										

DATE WRITTEN REPORT SUBMITTED	SIGNATURE OF PERSON SUBMITTING WRITTEN REPORT
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**APPENDIX E: RECORD OF SECONDARY CONTAINMENT**

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

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

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

**APPENDIX F: CALCULATION OF SECONDARY CONTAINMENT**

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

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

DRAFT

**APPENDIX G: MONTHLY FACILITY INSPECTION**

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

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

**Appendix G  
Steel Tank Institute SP001 Checklist**

**STI SP001 AST Record**

OWNER INFORMATION	FACILITY INFORMATION	INSTALLER INFORMATION
Name	Name	Name
Number and Street	Number and Street	Number and Street
City, State, Zip Code	City, State, Zip Code	City, State, Zip Code

**TANK ID** \_\_\_\_\_

**SPECIFICATION:**

Design:     UL \_\_\_\_\_     SWRI \_\_\_\_\_     Horizontal     Vertical     Rectangular  
 API \_\_\_\_\_     Other \_\_\_\_\_  
 Unknown

Manufacturer: \_\_\_\_\_    Contents: \_\_\_\_\_    Construction Date: \_\_\_\_\_    Last Repair/Reconstruction Date: \_\_\_\_\_

Dimensions: \_\_\_\_\_    Capacity: \_\_\_\_\_    Last Change of Service Date: \_\_\_\_\_

Construction:     Bare Steel     Cathodically Protected (Check one: A.  Galvanic or B.  Impressed Current) Date Installed: \_\_\_\_\_  
 Coated Steel     Concrete     Plastic/Fiberglass     Other  
 Double-Bottom     Double-Wall     Lined Date Installed: \_\_\_\_\_

Containment:     Earthen Dike     Steel Dike     Concrete     Synthetic Liner     Other \_\_\_\_\_

CRDM: \_\_\_\_\_     Date Installed: \_\_\_\_\_    Type: \_\_\_\_\_

Release Prevention Barrier:  Date Installed: \_\_\_\_\_    Type: \_\_\_\_\_

<b>TANK ID</b> _____			
<b>SPECIFICATION:</b>			
Design:	<input type="checkbox"/> UL _____	<input type="checkbox"/> SWRI _____	<input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical <input type="checkbox"/> Rectangular
	<input type="checkbox"/> API _____	<input type="checkbox"/> Other _____	
	<input type="checkbox"/> Unknown		
Manufacturer:	Contents:	Construction Date:	Last Repair/Reconstruction Date:
Dimensions:	Capacity:	Last Change of Service Date:	
Construction:	<input type="checkbox"/> Bare Steel <input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date Installed: _____		
	<input type="checkbox"/> Coated Steel	<input type="checkbox"/> Concrete	<input type="checkbox"/> Plastic/Fiberglass <input type="checkbox"/> Other
	<input type="checkbox"/> Double-Bottom	<input type="checkbox"/> Double-Wall	<input type="checkbox"/> Lined Date Installed: _____
Containment:	<input type="checkbox"/> Earthen Dike	<input type="checkbox"/> Steel Dike	<input type="checkbox"/> Concrete <input type="checkbox"/> Synthetic Liner <input type="checkbox"/> Other _____
CRDM:	<input type="checkbox"/>	Date Installed:	Type:
Release Prevention Barrier:	<input type="checkbox"/>	Date Installed: _____	Type: _____

<b>TANK ID</b> _____			
<b>SPECIFICATION:</b>			
Design:	<input type="checkbox"/> UL _____	<input type="checkbox"/> SWRI _____	<input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical <input type="checkbox"/> Rectangular
	<input type="checkbox"/> API _____	<input type="checkbox"/> Other _____	
	<input type="checkbox"/> Unknown		
Manufacturer:	Contents:	Construction Date:	Last Repair/Reconstruction Date:
Dimensions:	Capacity:	Last Change of Service Date:	
Construction:	<input type="checkbox"/> Bare Steel <input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date Installed: _____		
	<input type="checkbox"/> Coated Steel	<input type="checkbox"/> Concrete	<input type="checkbox"/> Plastic/Fiberglass <input type="checkbox"/> Other
	<input type="checkbox"/> Double-Bottom	<input type="checkbox"/> Double-Wall	<input type="checkbox"/> Lined Date Installed: _____
Containment:	<input type="checkbox"/> Earthen Dike	<input type="checkbox"/> Steel Dike	<input type="checkbox"/> Concrete <input type="checkbox"/> Synthetic Liner <input type="checkbox"/> Other _____
CRDM:	<input type="checkbox"/>	Date Installed:	Type:
Release Prevention Barrier:	<input type="checkbox"/>	Date Installed: _____	Type: _____



<b>TANK ID</b> _____			
<b>SPECIFICATION:</b>			
Design:	<input type="checkbox"/> UL _____	<input type="checkbox"/> SWRI _____	<input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical <input type="checkbox"/> Rectangular
	<input type="checkbox"/> API _____		
	<input type="checkbox"/> Unknown	<input type="checkbox"/> Other _____	
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Dimensions:	Capacity:	Last Change of Service Date:	
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	<input type="checkbox"/> Coated Steel	<input type="checkbox"/> Concrete	<input type="checkbox"/> Plastic/Fiberglass <input type="checkbox"/> Other
	<input type="checkbox"/> Double-Bottom	<input type="checkbox"/> Double-Wall	<input type="checkbox"/> Lined Date Installed: _____
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<b>TANK ID</b> _____			
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Design:	<input type="checkbox"/> UL _____	<input type="checkbox"/> SWRI _____	<input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical <input type="checkbox"/> Rectangular
	<input type="checkbox"/> API _____		
	<input type="checkbox"/> Unknown	<input type="checkbox"/> Other _____	
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Dimensions:	Capacity:	Last Change of Service Date:	
Construction:	<input type="checkbox"/> Bare Steel <input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date Installed: _____		
	<input type="checkbox"/> Coated Steel	<input type="checkbox"/> Concrete	<input type="checkbox"/> Plastic/Fiberglass <input type="checkbox"/> Other
	<input type="checkbox"/> Double-Bottom	<input type="checkbox"/> Double-Wall	<input type="checkbox"/> Lined Date Installed: _____
Containment:	<input type="checkbox"/> Earthen Dike	<input type="checkbox"/> Steel Dike	<input type="checkbox"/> Concrete <input type="checkbox"/> Synthetic Liner <input type="checkbox"/> Other _____
CRDM:	<input type="checkbox"/>	Date Installed:	Type:
Release Prevention Barrier:	<input type="checkbox"/>	Date Installed: _____	Type: _____

# STI SP001 Annual Inspection Checklist

## General Inspection Information:

Inspection Date: _____	Retain Until Date: _____ (36 months from inspection date)
Prior Inspection Date: _____	Inspector Name: _____
Tanks Inspected (ID #'s): _____	

## Inspection Guidance:

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

Item	Task	Status	Comments
<b>1.0 Tank Containment</b>			
1.1 Containment structure	Check for: <ul style="list-style-type: none"> <li>• Holes or cracks in containment wall or floor</li> <li>• Washout</li> <li>• Liner degradation</li> <li>• Corrosion</li> <li>• Leakage</li> <li>• Paint failure</li> <li>• Tank settling</li> </ul>	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>2.0 Tank Foundation and Supports</b>			
2.1 Foundation	Settlement or foundation washout?	<input type="checkbox"/> Yes* <input type="checkbox"/> No	
2.2 Concrete pad or ring wall	Cracking or spalling?	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	

Item	Task	Status	Comments
2.3 Supports	Check for corrosion, paint failure, etc.	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	
2.4 Water drainage	Water drains away from tank?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
2.5 Tank grounding	Strap secured and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
<b>3.0 Cathodic Protection</b>			
3.1 Galvanic cathodic protection system	Confirm system is functional, includes the wire connections for galvanic systems	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
3.2 Impressed current system	a. Inspect the operational components (power switch, meters, and alarms).	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
	b. Record hour meter, ammeter and voltmeter readings.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
<b>4.0 Tank Shell, Heads, Roof</b>			
4.1 Coating	Check for coating failure	<input type="checkbox"/> Yes* <input type="checkbox"/> No	
4.2 Steel condition	Check for: <ul style="list-style-type: none"> <li>• Dents</li> <li>• Buckling</li> <li>• Bulging</li> <li>• Corrosion</li> <li>• Cracking</li> </ul>	<input type="checkbox"/> Yes* <input type="checkbox"/> No	
4.3 Roof slope	Check for low points and standing water	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>5.0 Tank Equipment</b>			
5.1 Vents	Verify that components are moving freely and vent passageways are not obstructed for: <ul style="list-style-type: none"> <li>• Emergency vent covers</li> <li>• Pressure/vacuum vent poppets</li> <li>• Other moving vent components</li> </ul>	<input type="checkbox"/> Yes* <input type="checkbox"/> No	

Item	Task	Status	Comments
5.2 Valves	Check the condition of all valves for leaks, corrosion and damage.	<input type="checkbox"/> Yes* <input type="checkbox"/> No	
5.2.1 Anti-siphon, check and gate valves	Cycle the valve open and closed and check for proper operation.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.2.2 Pressure regulator valve	Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only)	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.2.3 Expansion relief valve	Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.2.4 Solenoid valves	Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.2.5 Fire and shear valves	a. Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
	b. Valves must not be wired in open position.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	

Item	Task	Status	Comments
	c. Make sure fusible element is in place and correctly positioned.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
	d. Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.3 Interstitial leak detection equipment	Check condition of equipment, including: <ul style="list-style-type: none"> <li>The window is clean and clear in sight leak gauges.</li> <li>The wire connections of electronic gauges for tightness and corrosion</li> <li>Activate the test button, if applicable.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.4 Spill containment boxes on fill pipe	a. If corrosion, damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit.	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	
	b. Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary.	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	
	c. Drain valves must be operable and closed	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	
5.5 Strainer	a. Check that the strainer is clean and in good condition.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	

Item	Task	Status	Comments
5.5 Strainer	b. Access strainer basket and check cap and gasket seal as well as bolts.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.6 Filter	a. Check that the filter is in good condition and is within the manufacturer's expected service life. Replace, if necessary.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
	b. Check for leaks and decreased fuel flow	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.7 Flame arrestors	Follow manufacturer's instructions. Check for corrosion and blockage of air passages.	<input type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A	
5.8 Leak detector for submersible pump systems	Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.9 Liquid level equipment	a. Has equipment been tested to ensure proper operation?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
	b. Does equipment operate as required?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
	c. Follow manufacturer's instructions	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
5.10 Overfill equipment	a. Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	
	b. Confirm device is suited for above ground use by the manufacturer	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A	



### APPENDIX H: DISCHARGE PREVENTION BRIEFING AND TRAINING LOG

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

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

Specific Training Objectives:

Attendee Roster (attach additional pages as necessary)

No.	Name of Attendee	Company





**EXHIBIT 15-2: OPERATION SPILL PREVENTION, CONTAINMENT, AND CONTROL PLAN**

# Cameron Wind I, LLC Facility

## Spill Prevention, Control, and Countermeasure (SPCC) Plan

Cameron County, Texas

May 11, 2020



Prepared By:

**Westwood**

Prepared For:



**APEX**  
CLEAN ENERGY

# Spill Prevention, Control, and Countermeasure (SPCC) Plan

Cameron Wind I, LLC Facility  
Cameron County, Texas

**Prepared for:**

Cameron Wind I, LLC  
24946 FM 1847  
Rio Hondo, Texas 78583  
434-996-8436

**Prepared by:**

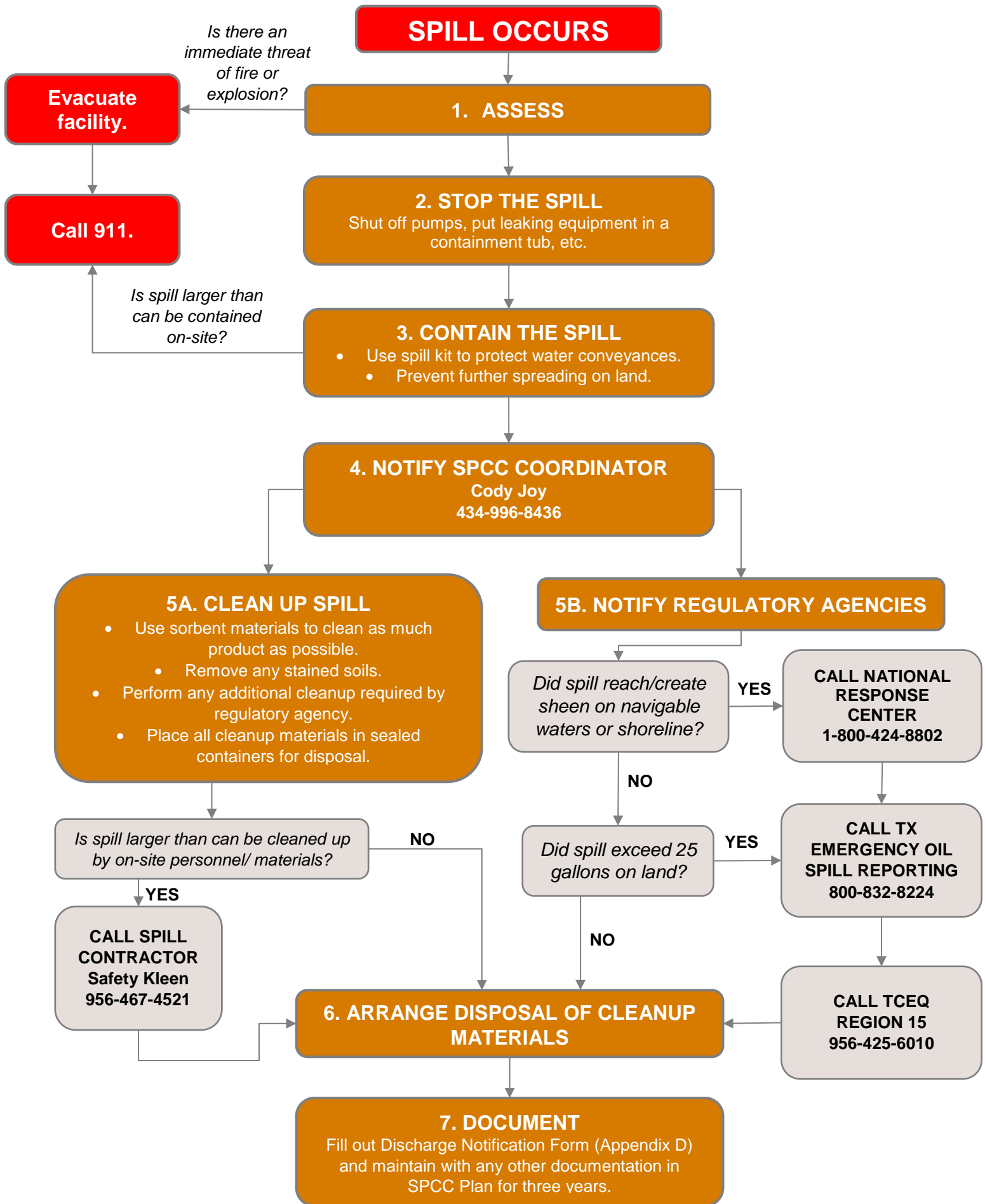
Westwood Professional Services  
12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343  
(952) 937-5150

Project Number: 0026320.00  
Date: May 11, 2020

## TABLE OF CONTENTS

<b>1.0</b>	<b>INTRODUCTION</b> .....	<b>2</b>
1.1	Purpose .....	2
1.2	Professional Engineer Certification .....	3
1.3	Management Certification of the SPCC Plan .....	4
1.4	Location of the SPCC Plan .....	5
1.5	Plan Review .....	5
1.6	SPCC Provision Cross-Reference .....	5
<b>2.0</b>	<b>GENERAL FACILITY INFORMATION</b> .....	<b>8</b>
2.1	Description of the Facility .....	8
2.2	Oil Storage .....	9
2.3	Discharge Potential .....	10
<b>3.0</b>	<b>DISCHARGE PREVENTION</b> .....	<b>11</b>
3.1	Deviations from Plan Requirements .....	11
3.2	Facility Layout Diagram and Remote Sites .....	11
3.3	Spill Reporting Procedures .....	12
3.4	Potential Discharge Volumes and Direction of Flow .....	12
3.5	Containment Drainage .....	13
3.6	Containment and Diversionary Structures .....	13
3.7	Practicability of Secondary Containment .....	14
3.8	Inspections, Tests, and Records .....	14
3.9	Personnel, Training, and Discharge Prevention Procedures .....	15
3.10	Security .....	15
3.11	Loading/Unloading .....	16
3.12	Brittle Fracture Evaluation .....	16
3.13	Conformance with State and Local Applicable Requirements .....	16
<b>4.0</b>	<b>DISCHARGE RESPONSE</b> .....	<b>17</b>
4.1	Response to a Minor Discharge .....	17
4.2	Response to a Major Discharge .....	18
4.3	Waste Disposal .....	19
4.4	Discharge Notification .....	19
<b>Appendix A: Substantial Harm Determination</b> .....		<b>27</b>

Certification .....	27
<b>Appendix B: Plan Review Log .....</b>	<b>28</b>
<b>Appendix C: Emergency Contacts .....</b>	<b>29</b>
<b>Appendix D: Discharge Notification Form .....</b>	<b>30</b>
Signature .....	31
<b>Appendix E: Record of Secondary Containment .....</b>	<b>32</b>
<b>Appendix F: Calculation of Secondary Containment .....</b>	<b>33</b>
<b>Appendix G: Monthly Facility Inspection .....</b>	<b>34</b>
<b>Appendix H: Discharge Prevention Briefing and Training Log .....</b>	<b>35</b>



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

## 1.0 INTRODUCTION

### 1.1 Purpose

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for Cameron Wind I, LLC for the operation of the Cameron Wind I, LLC Facility (Facility) located in Cameron County, Texas (see [Facility Location Figures](#)). The Cameron Wind I, LLC Facility is a 165-megawatt (MW) wind farm. The Facility consists of fifty-five (55) wind turbines, consisting of Acciona AW 3000 3-MW models, associated accessed roads and collection lines, a substation, and an operations and maintenance (O&M) Facility. For the purpose of this SPCC Plan, oil storage locations will include the O&M Facility, Substation, and individual wind turbine sites (referred to as the "Remote Sites").

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

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

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

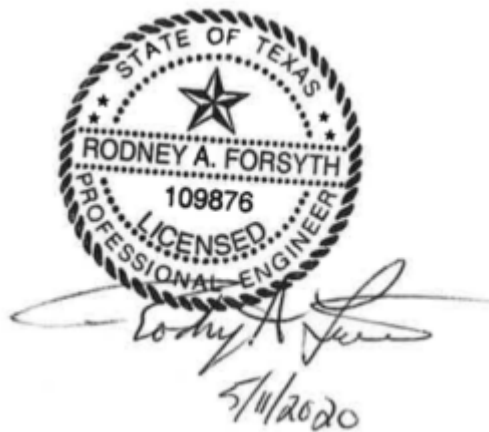
## 1.2 Professional Engineer Certification

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

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

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

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



---

Rod Forsyth  
Texas PE 109876

214-556-6909

May 11, 2020



### **1.3 Management Certification of the SPCC Plan**

The Owner of the Cameron Wind I, LLC Facility is Cameron Wind I, LLC. Cameron Wind I, LLC is committed to preventing discharges of oil into navigable waters of the United States or adjoining shorelines, or that may affect natural resources belonging to, appertaining to, or under the exclusive management of the United States through implementation and regular review and amendment to the SPCC Plan during construction of the Cameron Wind I, LLC Facility. Cameron Wind I, LLC has committed the necessary resources to implement the measures described in this SPCC Plan.

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

---

Cody Joy  
Cameron Wind I, LLC, Facility Manager  
434-996-8436  
May 11, 2020

## 1.4 Location of the SPCC Plan

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

**Table 1-1: Location of SPCC Plan**

General Location of the Plan	O&M Building
Hours Location is Attended	7:00 AM to 5:00 PM Monday through Friday
Specific Location of the Plan	Operations Supervisor's office in the O&M Building.
Location of Notices Regarding SPCC Plan	Notices of the location of the SPCC Plan will also be posted at the Substation.

## 1.5 Plan Review

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

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

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

The review and evaluation must be documented in a Plan Review Log, the form of which is contained in the [Appendix B: Plan Review Log](#). The Plan Review Log must state whether the SPCC Plan will be amended. Any technical revision to the SPCC Plan must be certified by a Professional Engineer in Texas.

## 1.6 SPCC Provision Cross-Reference

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

**Table 1-2: SPCC Cross Reference**

<b>Provision</b>	<b>Plan Section</b>	<b>Page</b>
112.3(d)	<a href="#">1.2 Professional Engineer Certification</a>	<a href="#">3</a>
112.3(e)	<a href="#">1.4 Location of the SPCC Plan</a>	<a href="#">5</a>
112.4	<a href="#">4.4 Discharge Notification</a>	<a href="#">19</a>
112.5	<a href="#">1.5 Plan Review</a>	<a href="#">5</a>
112.7	<a href="#">1.3 Management Certification of the SPCC Plan</a>	<a href="#">4</a>
112.7	<a href="#">1.6 SPCC Provision Cross-Reference</a>	<a href="#">5</a>
112.7(a)(3)	<a href="#">2.0 GENERAL FACILITY INFORMATION</a>	<a href="#">8</a>
112.7(a)(3)	<a href="#">3.1 Deviations from Plan Requirements</a>	<a href="#">11</a>
112.7(a)(3)	<a href="#">3.3 Spill Reporting Procedures</a>	<a href="#">12</a>
112.7(a)(4)	<a href="#">4.0 DISCHARGE RESPONSE</a>	<a href="#">17</a>
112.7(a)(5)	<a href="#">4.0 DISCHARGE RESPONSE</a>	<a href="#">17</a>
112.7(b)	<a href="#">3.4 Potential Discharge Volumes and Direction of Flow</a>	<a href="#">12</a>
112.7(c)	<a href="#">3.6 Containment and Diversionary Structures</a>	<a href="#">13</a>
112.7(d)	<a href="#">3.7 Practicability of Secondary Containment</a>	<a href="#">14</a>
112.7(e)	<a href="#">3.8 Inspections, Tests, and Records</a>	<a href="#">14</a>
112.7(f)	<a href="#">3.9 Personnel, Training, and Discharge Prevention Procedures</a>	<a href="#">15</a>
112.7(g)	<a href="#">3.10 Security</a>	<a href="#">15</a>
112.7(h)	<a href="#">3.11 Loading/Unloading</a>	<a href="#">16</a>
112.7(i)	<a href="#">3.12 Brittle Fracture Evaluation</a>	<a href="#">16</a>
112.7(j)	<a href="#">3.13 Conformance with State and Local Applicable Requirements</a>	<a href="#">16</a>
112.7(k)	<a href="#">3.4 Potential Discharge Volumes and Direction of Flow</a>	<a href="#">12</a>
112.8(b)	<a href="#">3.5 Containment Drainage</a>	<a href="#">13</a>
112.8(c)(1)	<a href="#">2.2 Oil Storage</a>	<a href="#">9</a>
112.8(c)(2)	<a href="#">3.6 Containment and Diversionary Structures</a>	<a href="#">13</a>
112.8(c)(3)	<a href="#">3.5 Containment Drainage</a>	<a href="#">13</a>
112.8(c)(6)	<a href="#">3.8 Inspections, Tests, and Records</a>	<a href="#">14</a>
112.8(c)(8)	<a href="#">3.6 Containment and Diversionary Structures</a>	<a href="#">13</a>
112.8(c)(10)	<a href="#">3.8 Inspections, Tests, and Records</a>	<a href="#">14</a>
112.8(d)	<a href="#">3.8 Inspections, Tests, and Records</a>	<a href="#">14</a>

**Table 1-2: SPCC Cross Reference**

Provision	Plan Section	Page
112.20(e)	<a href="#">Appendix A: Substantial Harm Determination</a>	27
112.20(f)2(i)	<a href="#">2.3 Discharge Potential</a>	10

### Oil Contingency Plan Cross-Reference

It has been determined that secondary containment is practicable at this facility for the bulk oil storage containers at the O&M facility, main power transformer at the substation, and gearboxes in the turbines. In lieu of providing sized secondary containment for the padmount transformers at the Remote Sites and spare padmount transformer at the O&M Facility, this SPCC Plan has been developed to meet the requirements of an Oil Contingency Plan as an Alternative Requirement to General Secondary Containment as set forth in 40 CFR 112.7(k)(2). The Oil Contingency Plan establishes the procedures for preventing, detecting, and responding to equipment failure and/or discharges.

This SPCC Plan meets the requirements set forth in 40 CFR 109.5, as illustrated in the cross-reference [Table 1-3](#), below. Please note that this SPCC Plan does not follow the exact order presented in 40 CFR Part 109.5 for Oil Contingency Plans.

**Table 1-3: Oil Contingency Plan Cross-Reference**

Provision	Plan Section	Page
109.5(a)	<a href="#">3.9 Personnel, Training, and Discharge Prevention Procedures</a>	30
109.5(b)(1)	<a href="#">2.3 Discharge Potential</a>	10
109.5(b)(2)	<a href="#">Appendix C: Emergency Contacts</a>	29
109.5(b)(3)	<a href="#">4.4 Discharge Notification</a>	19
109.5(b)(4)	<a href="#">4.4 Discharge Notification</a>	19
109.5(c)(1)	<a href="#">3.6 Containment and Diversionary Structures</a>	13
109.5(c)(2)	<a href="#">3.4 Potential Discharge Volumes and Direction of Flow</a>	12
109.5(c)(3)	<a href="#">3.9 Personnel, Training, and Discharge Prevention Procedures</a>	15
109.5(d)(1)	<a href="#">3.9 Personnel, Training, and Discharge Prevention Procedures</a>	15
109.5(d)(2)	<a href="#">3.9 Personnel, Training, and Discharge Prevention Procedures</a>	15
109.5(d)(3)	<a href="#">2.1 Description of the Facility</a>	8
109.5(d)(4)	<a href="#">4.0 DISCHARGE RESPONSE</a>	17
109.5(d)(5)	<a href="#">2.3 Discharge Potential</a>	10
109.5(e)	<a href="#">3.13 Conformance with State and Local Applicable Requirements</a>	16

## 2.0 GENERAL FACILITY INFORMATION

### 2.1 Description of the Facility

**Table 2-1: Facility Information**

<b>Owner Information</b>	
Owner Legal Entity	Cameron Wind I, LLC
Owner Best Contact	Cody Joy
Address	24946 FM 1847, Rio Hondo, TX 78583
Owner Best Contact Phone and Email	434-996-8436; cody.joy@apexcleanenergy.com
<b>Facilities Include:</b>	
Remote Sites	55 Turbines
O&M Facility	1.67 Acres
Substation	1.2 Acres
<b>Facility</b>	
O&M Building Address	24946 FM 1847, Rio Hondo, TX 78583

The Cameron Wind I, LLC. Facility is a 165-MW wind energy facility located in Cameron County, Texas, with the project center approximately seven (7) miles southeast from the nearest town of Rio Hondo. The Facility covers approximately 21,850 acres and consists of fifty-five (55) Acciona AW 3000 3-MW wind turbines and supporting infrastructure, including the O&M Facility and a Substation (see [Facility Location Figures](#)). The Facility defined by this SPCC Plan consists of the distinct areas that contain oil products and/or oil storage, which include the Remote Sites, the O&M Building, and the Substation. Hours of operation for the Facility are typically between 7:00 AM to 5:00 PM Monday through Friday. Locations of all of the Facilities are shown in the [Facility Location Figures](#).

The fifty-five (55) wind turbine sites (Remote Sites) consist of the wind turbines, comprising the turbine towers, nacelles (generator housing), and blades, as well as padmount transformers. All electrical and network connections within the turbines are made via cables routed through the center of the tower. Machinery is accessed via a ladder inside the tower.

The 1.67-acre O&M Facility is located at 24946 FM 1847 in Rio Hondo, Texas. The O&M Facility functions as the Facility operations center and contains offices for Facility staff, a shop for minor maintenance activities, material storage areas, and a gravel-paved parking lot.

The 1.2-acre Substation is located directly south adjacent to the O&M Facility. The Substation houses the bulk of the Facility's electrical system, including grounding transformers and the main power transformer.

## 2.2 Oil Storage

Bulk oil storage at the Facility consists of totes and drums. Oil-filled operational equipment at the site includes turbine gearboxes and transformers. Oil is stored in three main areas of the Facility: the Remote Sites, the O&M Facility, and the Substation. Oil storage in each area consists of the following:

- At the Remote Sites, gear oil and hydraulic oil are stored in the fifty-five (55) gearboxes within the turbines and mineral oil is stored in the fifty-five (55) padmount transformers;
- At the O&M Facility, gear oil, hydraulic oil, mineral oil, and waste oil are stored in drums and totes, and mineral oil is stored in the spare padmount transformer;
- At the Substation, mineral oil is stored in the main power transformer.

An inventory of the products stored at the Facility is shown below in [Table 2-2](#). All containers with a capacity of fifty-five (55) gallons or more are included, unless otherwise exempt from the rule.

Oil products will be used to maintain and repair the wind turbines and will also be used as dielectric fluid in the transformers. Oils and greases required for routine maintenance and repair of the turbines will be stored in original product containers in the shop of the O&M Facility. Oil in the gearboxes must be periodically changed; therefore, the site must maintain stores of fresh oil on-site and generate used oil.

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

**Table 2-2: Oil Storage Inventory**

Capacity (gallons)	Quantity	Content	Storage Containment	Secondary Containment	Party Responsible for Oil Storage
<b>Remote Sites</b>					
180	55	Gear Oil	WTG Gearbox	Self-contained	Cameron Wind I, LLC
75	55	Hydraulic Oil	WTG Gearbox	Self-contained	Cameron Wind I, LLC
557	55	Mineral Oil	Padmount Transformer	Active Containment/ Sorbent Materials	Cameron Wind I, LLC
<b>O&amp;M Facility</b>					

**Table 2-2: Oil Storage Inventory**

Capacity (gallons)	Quantity	Content	Storage Containment	Secondary Containment	Party Responsible for Oil Storage
55	4	Gearbox Oil	55-gallon Drum	Concrete Pit	Cameron Wind I, LLC
55	6	Hydraulic Oil	55-gallon Drum	Concrete Pit	Cameron Wind I, LLC
160	2	Waste Oil	Portable Tote	Concrete Pit	Cameron Wind I, LLC
55	2	Mineral Oil	55-gallon Drum	Containment Berm	Cameron Wind I, LLC
557	1	Mineral Oil	Spare Padmount Transformer	Containment Berm	Cameron Wind I, LLC
<b>Substation</b>					
15,975	1	Mineral Oil	Main Power Transformer	Concrete Pit	Cameron Wind I, LLC

### 2.3 Discharge Potential

The overall project area is made up of flat low lying lands consisting of shallow or seasonal lakes, reservoirs, oxbow lakes, arroyos, and irrigation ditches. There are certain areas where water is retained on site. This includes Cross Lake, Sweeney Lake, El Preseno Lake, and Reservoir Number Seven. The remaining water for the entire site area has different local flow directions, but collectively drains to the northeast, via Cayo Atascoso, Laguna Atascoso, and Arroyo Colorado. Eventually the flow discharges into Laguna Madre of the Gulf of Mexico approximately fifteen (15) miles northeast of the center of the site area. The Facility has multiple discharge points to the receiving waters but the runoff directly from the disturbed areas is generally non-point discharges via overland flow. Due to the remote nature and large quantity of turbine sites, drainage patterns vary for each turbine site. However, it is unlikely that simultaneous discharges will occur at multiple turbine sites. If a discharge reaches a navigable water, the priority is to control it before it discharges downstream to other water uses. Point discharge locations are noted below and are located within the drainage areas shown on [Figure 2](#).

The O&M Facility and Substation are located on relatively flat terrain and consists of a compacted gravel surface. Drainage generally flows south within both facilities and drains via overland flow to a north flowing roadside ditch along FM 1847. This drainage ultimately reaches Cayo Atascoso approximately 2.5 miles southeast of the O&M Facility and Substation.

Discharge potential for the Remote Sites is primarily associated with leaks and construction equipment refueling and breakdowns. The direction of discharge and release potential at the Remote Sites vary depending upon the individual locations of the turbines, access roads, and collection lines. The topography is characterized by flat low lying land topography with shallow or seasonal lakes, reservoirs, oxbow lakes, arroyos and irrigation ditches.

### **3.0 DISCHARGE PREVENTION**

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

#### **3.1 Deviations from Plan Requirements**

Certain deviations in the SPCC Plan requirements are allowed under 40 CFR 112.7(a)(2) if equivalent environmental protection is provided. Based on a review by the Professional Engineer certifying this plan, the Facility has the following exceptions that deviate from the applicable requirements but utilize environmentally equivalent protection.

Original product packaging will be used to store new mineral and hydraulic oil. The product containers meet the U.S. Department of Transportation (DOT) performance standard for containers containing petroleum products and are not reused for oil storage after the product is removed. The containers are stored within a containment pit at the O&M Facility. The containers are movable and all sides can be made visible for inspection. Because the containers meet the DOT standard and are not reused for extended waste oil storage, visual inspection provides sufficient environmental protection and integrity testing is not necessary.

Visual integrity inspection is considered sufficient for drum/tote storage on a daily basis ( cursory observations) and monthly basis (written inspection procedures) for signs of deterioration or leaks, and is immediately replaced if signs of deterioration or leaks are apparent.

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

#### **3.2 Facility Layout Diagram and Remote Sites**

The Drainage Map is attached in the [Facility Location Figures](#). Facility Layout Diagrams are attached for each of the facilities described above which show the location of storage containers and general layout. As required under 40 CFR 112.7(a)(3), the Facility diagrams indicate the location and contents of bulk oil storage.



### 3.3 Spill Reporting Procedures

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

### 3.4 Potential Discharge Volumes and Direction of Flow

[Table 3-1](#) below contains expected volume, discharge rate, general direction of flow in the event of equipment failure at the Facility, and means of secondary containment.

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

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

Potential Event	Maximum Volume Released (Gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
<b>Remote Sites</b>				
Leaking/Rupturing Gearbox	180	Gradual to Instantaneous	Varies	Self-contained
Leaking/Rupturing Hydraulic Unit	75	Gradual to Instantaneous	Varies	Self-contained
Leaking/Rupturing Transformer	557	Gradual to Instantaneous	Varies	Active Containment/ Sorbent Materials
<b>O&amp;M Facility</b>				
Leaking/Rupturing Drum	55	Gradual to Instantaneous	East	Concrete Pit
Leaking/Rupturing Tote	160	Gradual to Instantaneous	East	Concrete Pit
Leaking/Rupturing Transformer	557	Gradual to Instantaneous	East	Containment Berm
<b>Substation</b>				
Leaking/Rupturing Transformer	15,975 gal	Gradual to Instantaneous	North	Concrete Pit

### **3.5 Containment Drainage**

Drainage from the containment pits surrounding totes, drums, and transformers at the O&M Facility and Substation are controlled by the impervious sides of the pits and berms. The areas are drained by Cameron Wind I, LLC by manually activated pumps. The retained rainwater is inspected by Cameron Wind I, LLC prior to draining to ensure that only oil-free water is discharged. A sorbent filter boom will be used to absorb any oils in the containment area. Drainage events are recorded in the log included in [Appendix E](#).

### **3.6 Containment and Diversionary Structures**

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

#### **Double-walled Tanks**

There are no ASTs at the facility. If ASTs are added to the site, they will be double-walled to meet EPA SPCC secondary containment requirements under 40 CFR Part 112.7(c). Any ASTs with a storage capacity of 660 gallons or more storing Class I, II, or IIIA combustible liquids is required to have vent pipe outlets located twelve (12) feet above ground level under the International Fire Code.

#### **Bulk Storage**

Oil-filled bulk storage containers will be stored at the O&M Facility. Specifically, the drums and totes will be stored in a containment pit at the O&M Facility. The secondary containment pit will have enough volume to contain 110% of the largest container in the pit.

For oil-filled operational equipment (transformers and wind turbines) which are not considered bulk storage containers, containment measures are summarized below:

#### **Wind Turbines**

The wind turbines have an inner oil containment system built into the tower. There is a seal between the nacelle and the top tower section that will contain most liquids in the nacelle up to approximately 30-40 gallons. Leakage of the gear oil and hydraulic oil will first be contained within the nacelle, and then overflow would run down the inner tower support. Sorbent materials will be used to clean up and contain oil as needed. The Facility is monitored by a SCADA system which allows operations staff to identify leaking oil-filled operation equipment. If the SCADA system identifies any leaking operational equipment, it will cause a turbine fault which will require the equipment to be repaired.

## **Sorbent Material**

Spill cleanup kits that include sorbent material, booms, or other portable barriers shall be located near the oil storage area at the O&M Facility (absorption capacity of 95 gallons). Portable spill kits shall be located in on site trucks and vehicles (absorption capacity of 20 gallons). The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment in the event of a discharge outside the containment area or at the turbine sites.

### **3.7 Practicability of Secondary Containment**

It has been determined that secondary containment is practicable at this facility for the turbines at the Remote Sites, drums at the O&M Facility, and the main power transformer at the Substation. In lieu of providing sized secondary containment for the padmount transformers at the Remote Sites and the spare padmount transformer at the O&M Facility, this SPCC Plan meets the requirements of an Oil Contingency Plan as an Alternative Requirement to General Secondary Containment as set forth in 40 CFR 112.7(k)(2). The additional Oil Contingency Plan establishes the procedures for preventing, detecting, and responding to equipment failure and/or discharges. The Oil Contingency Plan meets the requirements set forth in 40 CFR 109.5.

### **3.8 Inspections, Tests, and Records**

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

All problems regarding containers, piping, containment, or response equipment will be immediately reported to the SPCC Emergency Coordinator listed in [Section 1.3](#). Visible oil leaks from containers,, piping, or other components must be repaired as soon as possible to prevent a larger spill or discharge to navigable waters or adjoining shorelines. Pooled oil shall be removed immediately upon discovery.

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

Monthly inspections shall be recorded using the checklist in [Appendix G](#) and include:

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

- Checking the inventory of discharge response equipment and restocking as needed.

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

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

### **3.9 Personnel, Training, and Discharge Prevention Procedures**

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

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

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

### **3.10 Security**

Security systems at the O&M Facility and Substation include, but are not limited to, a security alarm, cameras, key pad to operate gates and the front door at the O&M Facility, and locking the facilities when not in use. Fencing is generally not provided at the Remote Sites. Instead, environmental equivalent protection is being provided by the remote locations, full-time Facility personnel at the O&M Facility Monday through Friday 7:00 AM to 5:00 PM, and regular rounds by staff of the Facility's outlying areas. One person is typically on-call during the weekends.

### **3.11 Loading/Unloading**

There is no dedicated loading/unloading rack at the Facility during the operation phase of the Project. Tank truck loading/unloading procedures conform to regulations established by the U.S. Department of Transportation should loading/unloading occur. Cameron Wind I, LLC will ensure that vendors understand the site layout, that they know the protocols for unloading oil products, and that they have the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose. This applies to loading/unloading at both the O&M Facility, Substation, and Remote Sites.

Operational equipment and storage container filling/unloading operations at the O&M Facility shall be performed by Facility personnel trained in proper discharge prevention procedures.

### **3.12 Brittle Fracture Evaluation**

There are no field constructed ASTs at the Facility.

### **3.13 Conformance with State and Local Applicable Requirements**

Each responsible Owner or Operator at the Facility is required to get all necessary tanks approved, registered, and permitted with applicable Federal, State, and Local Agencies, including the State Fire Marshal. Each Owner or Operator at the Facility that has an aggregate storage capacity of 1,320 gallons or greater of petroleum (excluding oil-filled electrical equipment) is subject to the Texas Administrative Code (TAC) and is required to submit all necessary forms and permit all required tanks with the Texas Commission on Environmental Quality (TCEQ).

Any entity who performs or coordinates regulated Leaking Petroleum Storage Tank (LPST) corrective action in the State of Texas must be registered with the TCEQ as an LPST Corrective Action Specialist. Additionally, any individual who supervises any corrective action required on an LPST site in the State of Texas must be licensed with the TCEQ as an LPST Corrective Action Project Manager.

Any size release of oil that is detrimental to the quality of waters of the state (causes a sheen) or any size release of oil that is discharged onto land in excess of twenty-five (25) gallons also requires immediate notification to the National Response Center (800-424-8802) and the Texas Emergency Oil Spill and Hazardous Substance Reporting (800-832-8224) or the TCEQ Region 15 (956-425-6010). If the release is not contained or threatens the health or safety of the local population, the Local Emergency Planning Committee (LEPC) within the county of the release must be notified first by dialing 911.

Diesel exhaust fluid, herbicide, cleaning products, engine coolants/antifreeze, or other containers with hazardous materials are not included in this SPCC Plan as they are not oil based products and are not subject to SPCC regulations, although any potential spills from these containers may be subject to the TCEQ spill reporting requirements for spills onto land or waters of the state. For the final Reportable Quantity (RQ) refer to Table 302.4 in 40 CFR §302.4.

Refer to [Section 4.4](#) for Discharge Notification requirements.

#### **4.0 DISCHARGE RESPONSE**

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

In general, the following steps shall be taken:

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

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

A list of Emergency Contacts is provided in [Appendix C](#). This list identifies personnel to be contacted in case of emergency and shall be posted on the information board in the O&M Facility.

#### **4.1 Response to a Minor Discharge**

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

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

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

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

## 4.2 Response to a Major Discharge

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

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

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

- Safety of personnel is the primary concern. No countermeasures that risk the health or safety of personnel should be undertaken;
- If the SPCC Emergency Coordinator is not present at the Facility, the senior on-site person shall notify the SPCC Emergency Coordinator of the discharge and has the authority to initiate notification and response;
- No smoking, open flames, cell phones, or other spark-inducing equipment is permitted in the area of a flammable material spill;
- Facility personnel should stop the source of the leak or spill if possible by closing a valve, turning off a pump, sealing a hole, etc. Facility personnel should take the following actions to contain the spill: use absorbent pads, booms, sand, and/or speedi-dri materials to stop the spread of the spill. Contaminated soil should be placed on an impermeable liner for containment;
- Emergency medical treatment and first aid shall be administered by personnel certified in first aid/CPR. The SPCC Emergency Coordinator (or senior on-site person) must call for medical assistance if workers are injured;
- Establish fire prevention measures in the vicinity of the spill. Divert traffic (vehicular and pedestrian) from the area. The SPCC Emergency Coordinator (or senior on-site person) must call the local Fire Department or Police Department;
- If Facility personnel are unsure of the hazards involved, the amount of the spill is too large, or a release to navigable waters or adjoining shorelines is threatened, the SPCC Emergency Coordinator (or senior on-site person) shall call for outside assistance from a spill response/cleanup contractor;
- The SPCC Emergency Coordinator (or senior on-site person) will immediately (within fifteen minutes) call the National Response Center (800-424-8802) and the Texas Emergency Oil Spill and Hazardous Substance Reporting (800-832-8224) or the TCEQ Region 15 (956-425-6010).
- The SPCC Emergency Coordinator (or senior on-site person) will complete the discharge notification form in [Appendix D](#) and attach a copy to this SPCC Plan; and
- The SPCC Emergency Coordinator (or senior on-site person) will coordinate cleanup and contract a cleanup contractor as necessary.

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

### 4.3 Waste Disposal

Waste resulting from a minor discharge response will be contained in impervious bags, drums, or buckets. The SPCC Emergency Coordinator will characterize the waste for proper disposal and ensure it is removed from the Facility by a licensed waste hauler.

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

Cameron Wind I, LLC has contracted with Safety-Kleen (956-467-4521) in the event that hazardous material needs to be removed from the site.

### 4.4 Discharge Notification

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

Any size release of oil that is detrimental to the quality of waters of the state (causes a sheen) or any size release of oil that is discharged onto land in excess of 25 gallons also requires immediate notification to the National Response Center (800-424-8802) and the Texas Emergency Oil Spill and Hazardous Substance Reporting (800-832-8224) or the TCEQ Region 15 (956-425-6010). If the release is not contained or threatens the health or safety of the local population, the LEPC within the county of the release must be notified first by dialing 911.

In addition, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator for Region 6 (800-877-6063) and the appropriate state agency in charge of oil pollution control activities, in this case the TCEQ Region 15 (956-425-6010), whenever the Facility discharges more than 1,000 gallons of oil to a navigable water in a single event or discharges more than forty-two (42) gallons of oil to navigable waters in each of two (2) discharge incidents within a twelve (12) month period.

Contact information for reporting the discharge to the appropriate authorities is listed in [Appendix C](#) and is also posted at the information board in the O&M Facility.

A summary sheet is included in [Appendix D](#) to facilitate the reporting. The person reporting the discharge will provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Source and cause of the release or discharge;

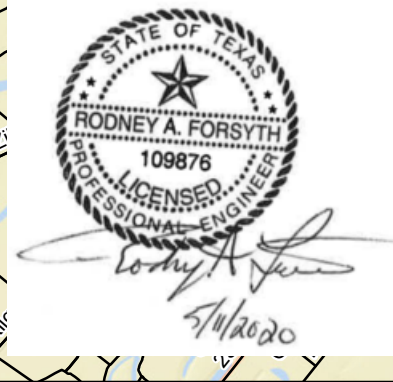
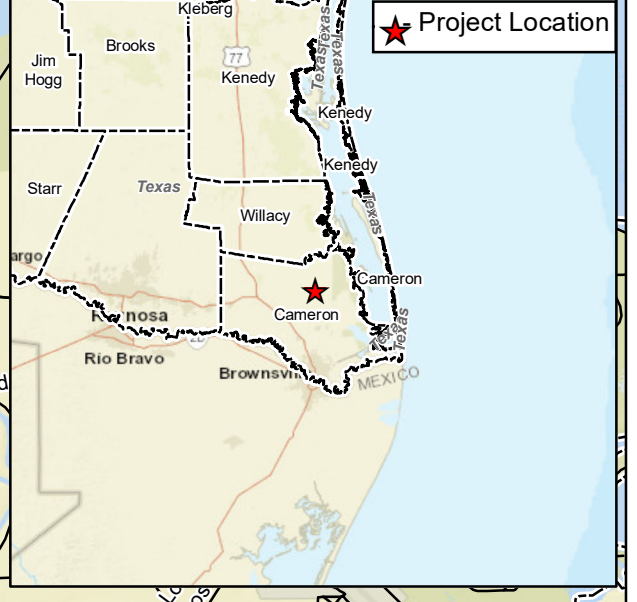
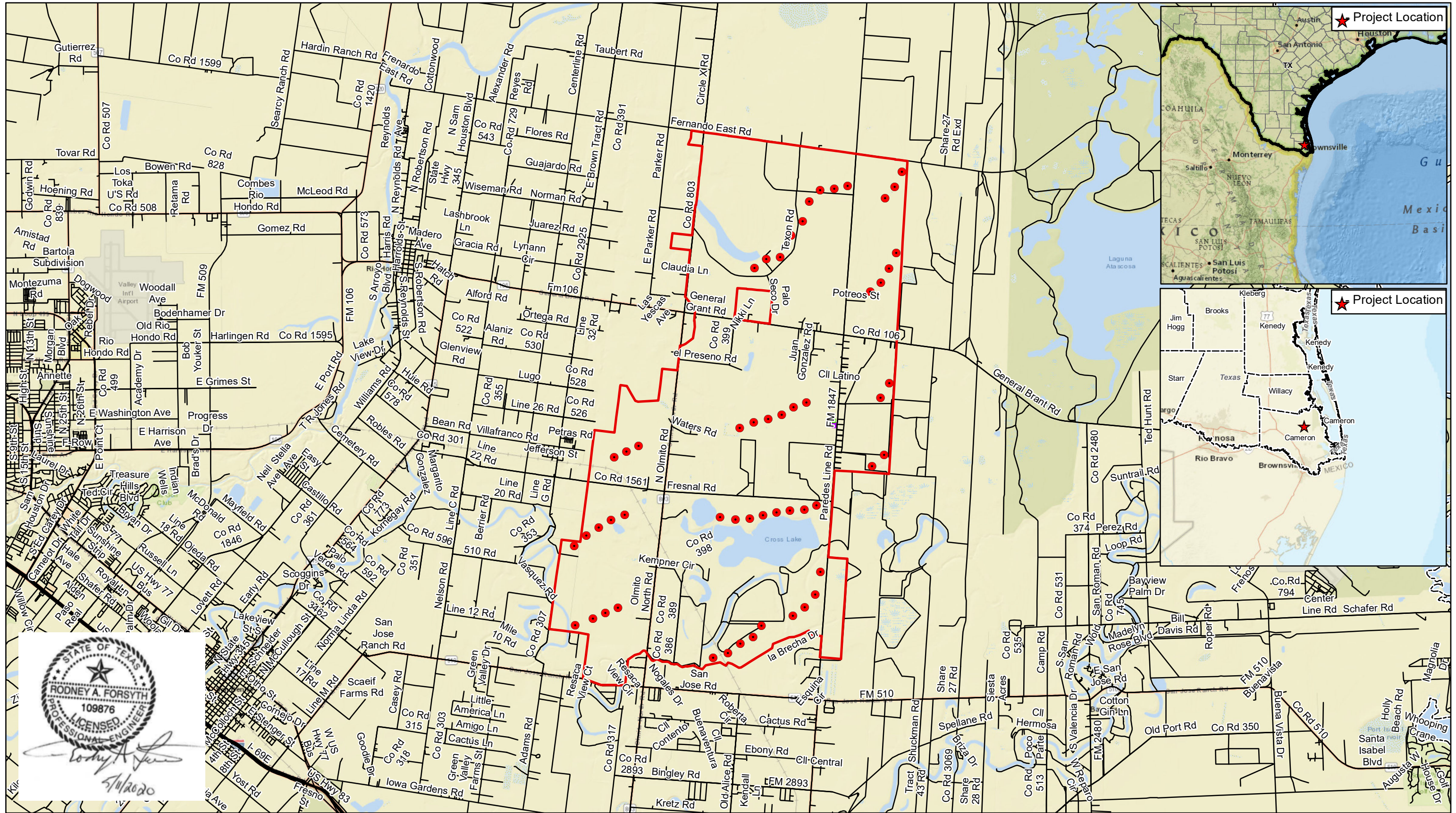


- Type of material(s) released or discharged;
- Quantity of materials released or discharged;
- Danger or threat posed by the release or discharge;
- Number and type of injuries, if any;
- Media affected or threatened by the discharge (i.e. water, land, or air);
- Action used to stop, remove, and mitigate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

The background of the page is a topographic map with red contour lines on a dark red background. A dashed red line runs vertically through the center. A solid red dot is located on the lower part of this dashed line, and a red 'x' is located to its right.

# Facility Location Figures





Data Source(s): Westwood (2020); Esri WMS Basemap Imagery (Accessed 2020); USGS (2020); FEMA (2020); USDA (2020)

**Legend**

- Project Boundary
- County Boundary
- Substation
- O & M Facility
- Existing Road
- Turbine Array

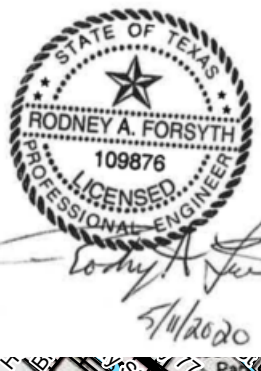
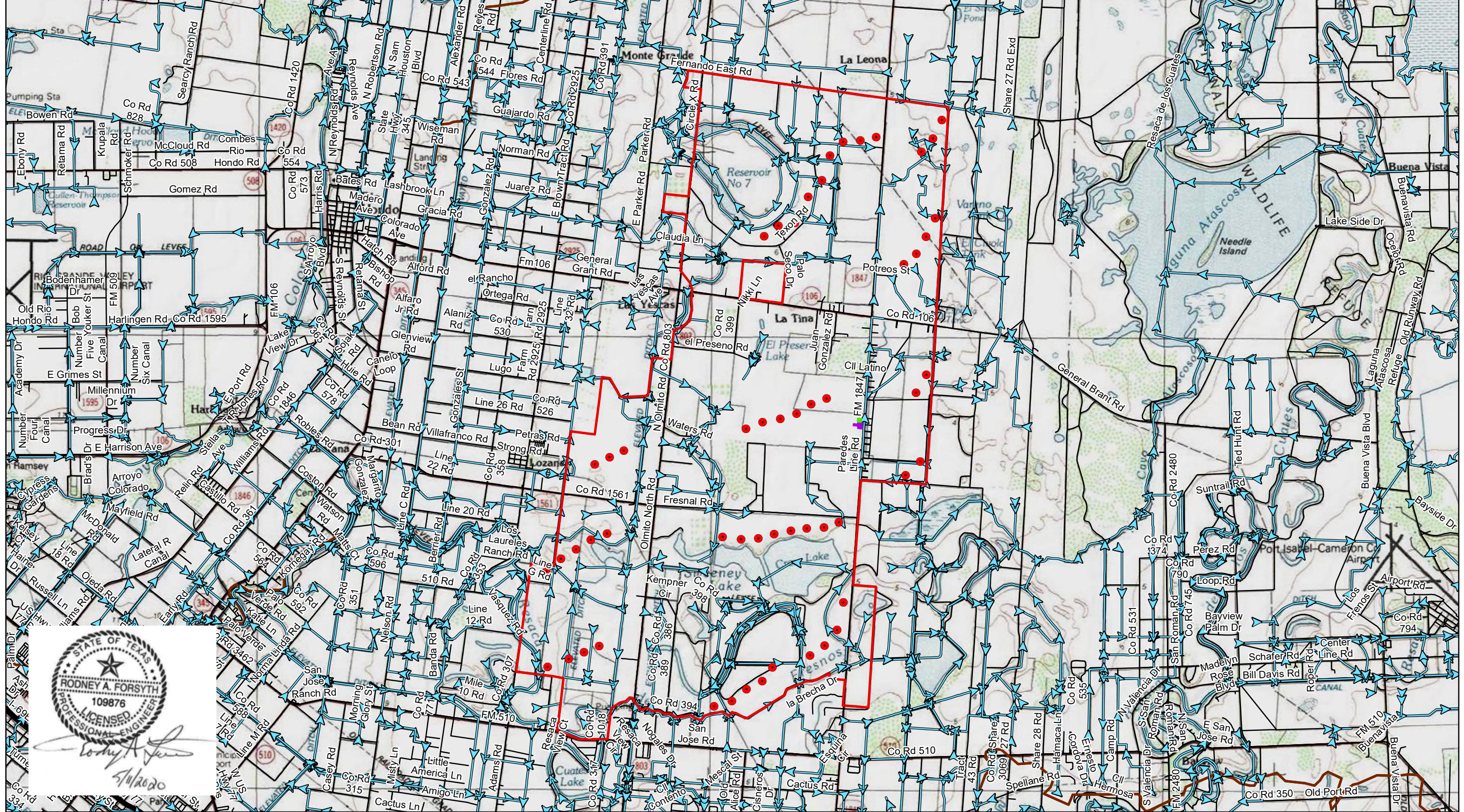


**Cameron Wind**  
Cameron County, Texas

Figure 1: Vicinity Map

February 19, 2020





Data Source(s): Westwood (2020); Esri WMS Basemap Imagery (Accessed 2020); USGS (2020); FEMA (2020); USDA (2020)

**Legend**

- Project Boundary
- County Boundary
- HUC 12 Boundary
- Substation
- O & M Facility
- Existing Road
- Turbine Array
- NHD Flowline

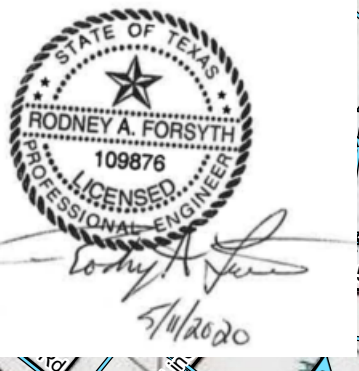
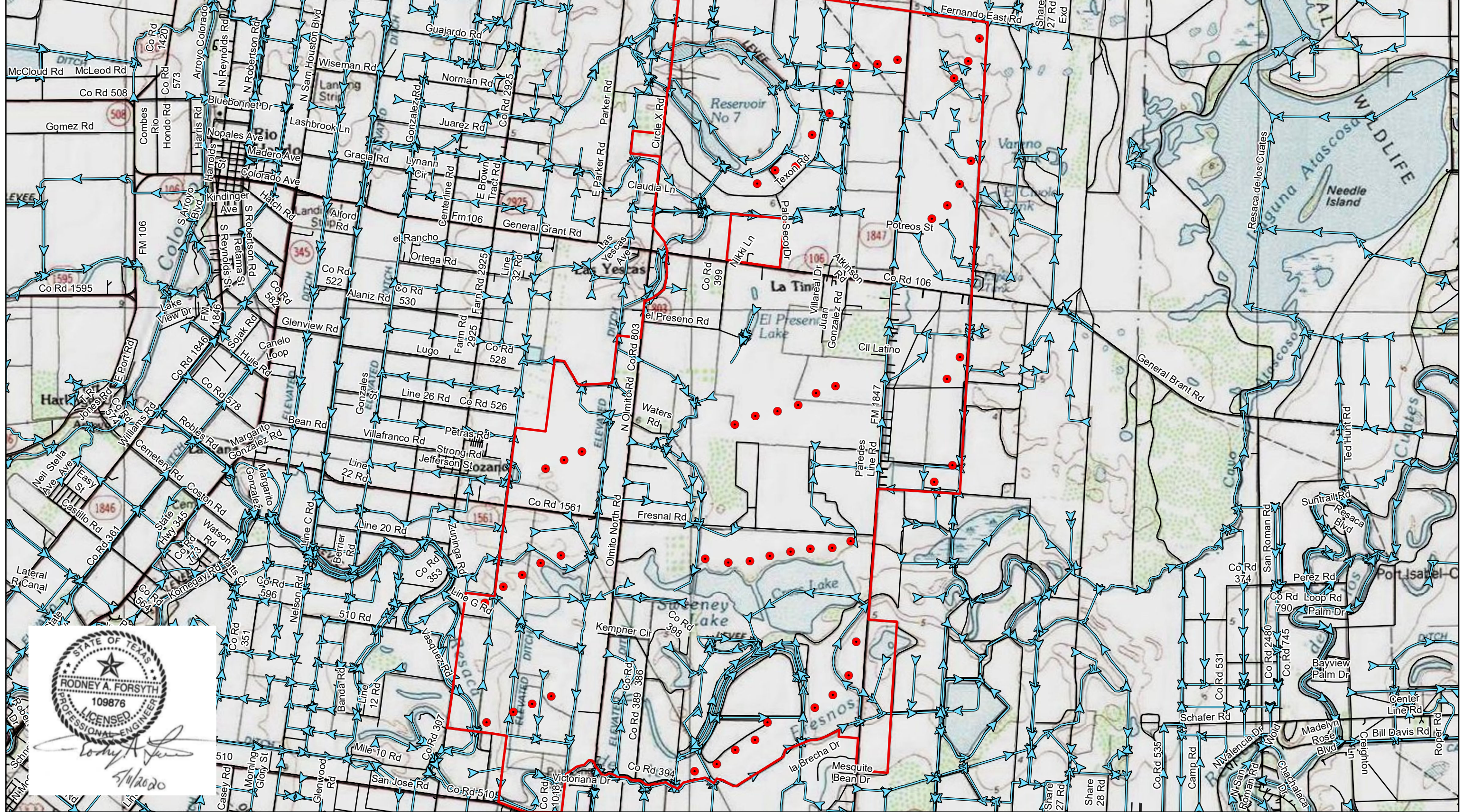
**Westwood**  
Toll Free (888) 937-5150 westwoodps.com



**Cameron Wind**  
Cameron County, Texas  
**Figure 2: Drainage Map**  
February 19, 2020

Map Document: N:\02\6320\_00\GIS\SPCC\_Exhibits\2020-02-19\_CameronWind\_Ext\_SPCC\_DrainageMap.mxd, Multithread 2/19/2020 10:11:10 AM





Data Source(s): Westwood (2020); Esri WMS Basemap; Imagery (Accessed 2020); USGS (2020); FEMA (2020); USDA (2020)

### Legend

- Project Boundary
- County Boundary
- NHD Flowline
- Existing Road
- Turbine Array



## Cameron Wind

Cameron County, Texas

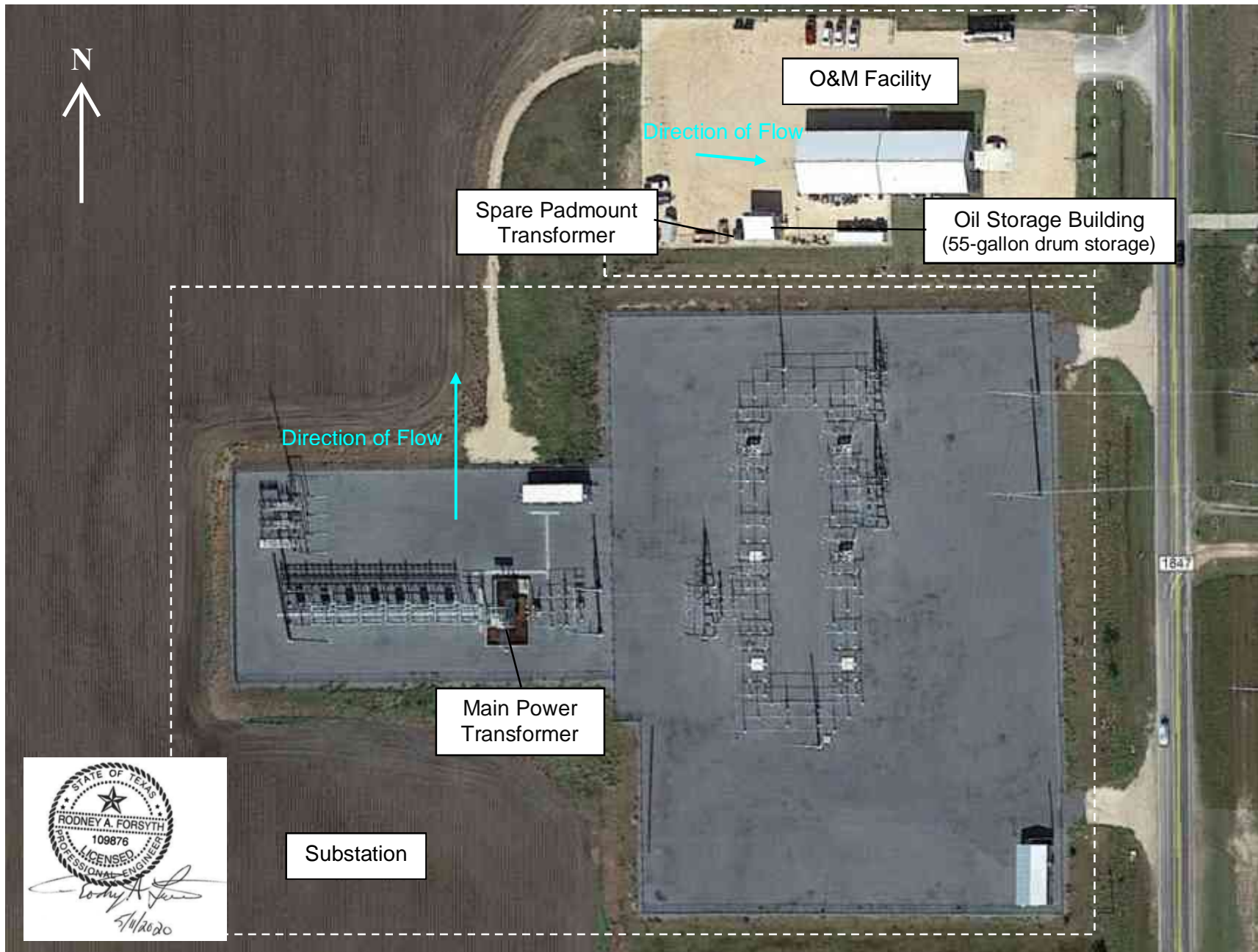
Figure 3: Remote Sites Map

February 19, 2020



# Cameron Wind Facility

## Layout Diagram – O&M Facility and Substation





The background of the page is a dark red color with a complex pattern of lighter red contour lines, resembling a topographic map. A dashed red line runs vertically through the center of the page. On this line, there is a solid red dot in the lower half and a small red 'x' in the upper half. The word "Appendices" is written in a white, serif font, centered horizontally and partially overlapping the dashed line.

# Appendices

**APPENDIX A: SUBSTANTIAL HARM DETERMINATION**

Facility Name: Cameron Wind I, LLC.

Facility Address: 24946 FM 1847, Rio Hondo, TX 78583

**Substantial Harm Determination**

Does the Facility transfer oil over water to or from vessels and does the Facility have a total oil storage capacity greater than or equal to 42,000 gallons?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and does the Facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and is the Facility located at a distance (as calculated using the appropriate formula in 40 CFR Part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the Facility could cause injury to fish and wildlife and sensitive environments?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and is the Facility located at a distance (as calculated using the appropriate formula in 40 CFR Part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the Facility would shut down a public drinking water intake?	No
Does the Facility have a total oil storage capacity greater than or equal to one million gallons and has the Facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?	No

**Certification**

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

Signature & Date	
Printed Name	
Company and Title	



**APPENDIX B: PLAN REVIEW LOG**

**Five (5) Year Review Log**

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

Five (5) Year Review Log

<b>Review Date</b>	<b>SPCC Plan Amendment</b>	<b>Name and Signature of Person Authorized to Review This SPCC Plan</b>

**Technical Amendment Log**

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

Technical Amendment Log

<b>Review Date</b>	<b>Description of Technical Amendment</b>	<b>Name and Signature of Person Certifying This Technical Amendment</b>

**APPENDIX C: EMERGENCY CONTACTS****EMERGENCY CONTACTS**

Person responsible for spill prevention: Cody Joy, Cameron Wind I, LLC

<b>Facility:</b>	
Cody Joy, Cameron Wind I, LLC Facility Manager	434-996-8436 24946 FM 1847, Rio Hondo, TX 78583
Marco Pineda, Cameron Wind I, LLC Senior Manager, Fleet Operations	956-404-0150, marco.pineda@apexcleanenergy.com
<b>Designated Spill Contractor:</b>	
Raul Cantu, Safety-Kleen	956-467-4521 1217 E Tamarack Ave, McAllen, TX 78501
<b>Local Emergency Response:</b>	
Cameron County 911	911
Cameron County Sheriff	956-233-6157 213 Orive Blvd, Los Fresnos, TX 78566
Rio Hondo Fire Department	956-748-3611 121 N Arroyo Blvd, Rio Hondo, TX 78583
<b>Notification:</b>	
National Response Center	800-424-8802
TCEQ, Region 15	956-425-6010 1804 W. Jefferson Avenue, Harlingen, TX 78550
Texas Emergency Oil Spill and Hazardous Substance Reporting	800-832-8224
U.S. Environmental Protection Agency, Region 6	800-877-6063 1445 Ross Avenue, Suite 1200, Dallas, TX 75202

**APPENDIX D: DISCHARGE NOTIFICATION FORM**

**Discharge Notification Form**

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

**Discharge Information**

Facility Name:	Cameron Wind I, LLC Facility
Address:	24946 FM 1847 Rio Hondo, TX 78583
Telephone:	956-404-0156
Operator:	Cameron Wind I, LLC
Primary Contact:	Cody Joy, Facility Manager 434-996-8436
Discharge Date:	Discharge Time:
Weather Conditions and Temperature:	
Name of reporting individual:	
Type of material:	
Quantity released:	
Estimated quantity released to navigable waters:	
Cause of discharge:	
Action taken to stop, remove, and mitigate the effects of the discharge:	
Media affected:	

**Damages or Injuries**


**Organizations and Individuals Contacted**

	Fire/Police/Ambulance	911	Time:
	Rio Hondo Fire Department	956-748-3611	Time:
	National Response Center	800-424-8802	Time:
	TCEQ, Region 15	956-425-6010	Time:
	Texas Emergency Oil Spill and Hazardous Substance Reporting	800-832-8224	Time:
	U.S. Environmental Protection Agency, Region 6	800-877-6063	Time:

**Signature**

Signature	
Printed Name	
Company & Title	

**APPENDIX E: RECORD OF SECONDARY CONTAINMENT**

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

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

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

**APPENDIX F: CALCULATION OF SECONDARY CONTAINMENT**

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

<b>Location</b>	<b>Secondary Containment Type</b>	<b>Secondary Containment Capacity</b>	<b>Largest Container Volume</b>	<b>110% of Largest Container</b>	<b>Sufficient? (Y/N)</b>
Drums in O&M Facility	Concrete Pit	22.67' x 16.67' x 0.42' = 158.7 cf x 7.48 gal/cf = 1,187 gal	55 gal	62 gal	Y
Spare Padmount Transformer at O&M Facility	Berm	10' x 8' x 1' = 80 cf x 7.48 gal/cf = 598.4 gal	557 gal	612.7 gal	N - Will be covered under Oil Contingency Plan
Substation - MPT	Concrete Pit	(53.5' x 35.5') - (22.5' x 14.5') x 2.67' = 4,200 cf x 7.48 gal/cf = 31,415 gal	15,795 gal	17,375 gal	Y



**APPENDIX G: MONTHLY FACILITY INSPECTION**

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

<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>Description and Comments</b>
<b><i>Containment Areas</i></b>			
Secondary containment is damaged or stained			
Standing water in containment			
Drainage valve is open or not secure			
Evidence of oil release from tank			
<b><i>Transformers</i></b>			
Transformer surfaces show signs of leakage			
Transformer is damaged, rusted, or deteriorated			
Bolts, rivets, or seams are damaged			
Transformer supports are deteriorated or buckled			
Transformer foundations have eroded or settled			
<b><i>Turbines</i></b>			
Turbine surfaces show signs of leakage			
Turbine is damaged, rusted, or deteriorated			
Bolts, rivets, or seams are damaged			
Turbine supports are deteriorated or buckled			
Turbine foundations have eroded or settled			
<b><i>Safety</i></b>			
Safety equipment missing or inoperable			
Spill response equipment used and not replaced			
Fire extinguisher not present/operational			
Fuel tank not grounded			
<b>Signature:</b>			
<b>Date:</b>			

**APPENDIX H: DISCHARGE PREVENTION BRIEFING AND TRAINING LOG**

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

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

Specific Training Objectives:

Attendee Roster (attach additional pages as necessary)

No.	Name of Attendee	Company