

Spill Prevention, Control, and Countermeasure (SPCC) Plan

For Construction of the

Ocotillo Express Wind Project Imperial County, California

Prepared for:

Ocotillo Express Wind Project

Prepared by:

Project Number: 20111179

May 3, 2012

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1.0 INTRODUCTION

1.1 Purpose of the SPCC Plan

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for Blattner Energy, Inc. (Blattner) for the construction of the Ocotillo Express Wind Project (Project) located in Imperial County, California (see **Figure 1**). The Project borders Imperial Highway S2 near Ocotillo, California on both federal and private lands. The total Project encompasses an area of approximately 13,444 acres; however, construction activity and disturbed area will consist of approximately 770 acres. The Project consists of the construction of approximately 137 Siemens 2.3 MW wind turbine generators (WTG) with associated access roads, collection lines, project substations, construction laydown yard and an operation and maintenance building.

The purpose of the SPCC Plan is to describe the procedures, methods, and equipment that are used to prevent the discharge of oil into navigable waters of the United States or their adjoining shorelines, 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 U.S. EPA regulations contained in Title 40, Code of Federal Regulations, Part 112 (40 CFR 112) and the California Aboveground Petroleum Storage Act as Codified in Section 25270 of the California Health and Safety Code. 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 Section 2.1, the total aboveground oil storage capacity is over 1,320 gallons; therefore, SPCC regulations apply.

For the purposes of the SPCC Plan, the term “Facility” is defined as two areas – a 10-acre temporary construction laydown yard (Laydown Yard), and the individual 137 WTG construction sites, associated access roads, collection lines and project substations (Remote Sites), as further described in Section 2.1.

The threat of substantial harm caused by the Facility has been evaluated and certified by Blattner 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**.

1.2 Professional Engineer Certification

I certify that I am the preparer of this SPCC Plan.

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

- I am familiar with the applicable requirements of 40 CFR 112;
- I have visited and examined the Facility, or have supervised examination of the Facility by appropriately qualified personal;
- This SPCC Plan has been prepared in accordance with good engineering practice;
- 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 112.

Signature

Name and Title

California PE Registration Number

Date

Telephone Number

1.3 Management Certification of the SPCC Plan

The Owner of the Ocotillo Express Wind Project is Ocotillo Express LLC. The Owner has engaged Blattner Energy, Inc. as the General Contractor for the Project. This SPCC Plan is being managed by Blattner and applies to construction of the Project. The Owner will prepare a separate SPCC Plan for the operation of the Project that will go into effect once construction is complete.

Blattner is committed to preventing discharges of oil into navigable waters of the United States through implementation and regular review and amendment to the SPCC Plan during construction of the Ocotillo Express Wind Project. Blattner 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.

Signature

Name

Title

Date

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 hours per day or at the nearest field office when the Facility attended less than four hours per day.

Because the Laydown Yard is typically attended from 6:30 am to 7:30 pm, the copy of the SPCC Plan will be located in the main office area in the Blattner construction trailer in the Laydown Yard. 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 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; and
- In the event of a spill into waters of the United States or adjoining shorelines.

As a result of the review, SPCC Plan will be amended within six months to include more effective prevention and control measures for the Facility, if applicable. Amendments will be implemented as soon as possible, but no later than six 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 **Appendix B**. 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.

1.6 SPCC Provision Cross-Reference

This SPCC Plan does not follow the exact order presented in 40 CFR part 112. **Table 1-1** below presents a cross-reference of Plan sections relative to the applicable parts of 40 CFR part 112.

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112.7(a)(3)	Part 2: General Facility Information	5
	Figure 2: Site Location Map	Attached
	Figures 3 and 4: Facility Layout Diagram	Attached
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112.20(e)	Certification of Substantial Harm Determination	Appendix A

2.0 GENERAL FACILITY INFORMATION

2.1 Description of the Facility

Owner: Ocotillo Express LLC

Operator/Construction Manager: Blattner Energy, Inc.

The address and phone number for the Project Facility Laydown Yard is:

Ocotillo Express Wind Project

Contractor Construction Trailer

1377 West Imperial Highway

Ocotillo, CA 92259

Phone: Kim Johnson, 320-290-8930 (Laydown phone number will be inserted when created)

The Project Location Map shown on a U.S. Geological Survey quadrangle map for the area is attached as **Figure 2**. The Facility defined by this SPCC Plan consists of two distinct components. First is an approximately 10-acre temporary construction laydown yard located near Imperial Highway S2 (Laydown Yard). The second component is the 137 individual WTG construction sites, project substation, associated access roads and collection lines within the project area (Remote Sites). The Facility is located in Imperial County, California. Construction activity will disturb an area consisting of approximately 770 acres, consisting of both temporary and permanent improvements.

The Facility Layout Diagrams are attached as **Figures 3 and 4** and show the locations and layout of the temporary construction Laydown Yard and the layout of the remote sites. Oil storage primarily occurs at the Laydown Yard where oil products are stored in several aboveground storage tanks (AST) for use during construction. The tanks are used by Blattner and its

subcontractors primarily to store fuel and other vehicle fluids. A fuel truck is used to transport fuel from the Laydown Yard to the construction equipment as needed. Permanent secondary containment will be provided around the padmount transformers at the remote sites.

Hours of operation for the Facility are typically between 6:30 am and 7:30 pm. There are construction trailers/offices at the Laydown Yard that are used by the Owner, Blattner and other subcontractors. Access to the Laydown Yard is off of Imperial Highway S2.

At the Remote Sites, construction is conducted using distinct crews for the construction of each component of the turbines. The crews move from turbine site to turbine site as the construction progresses, and may be at 2-3 sites per day. The number of active turbine construction sites varies, but typically there may be construction occurring at up to approximately 15 different sites. Construction is also occurring at the project substation and along the access roads.

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.

Ocotillo Express LLC

Ocotillo Express LLC is the owner of the Ocotillo Express Wind Project. The Owner has engaged Blattner 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.

Blattner

Blattner is the General Contractor for the construction of the Ocotillo Express Wind Project. Blattner is responsible for the construction of the wind turbines, associated access roads, substations and O&M building. Blattner will engage subcontractors for the crane operator, underground electrical, substation, O&M building, civil work and tower wiring, as well as 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 security of oil storage areas;
- Notify 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;
- Maintaining the MSDS sheets;
- Ensure that emergency response equipment is available and working properly; and
- Update the SPCC Plan as required.

Subcontractors

Blattner has not yet awarded the remaining subcontracts for the Project. Subcontractors will be selected and include the crane operator, underground and overhead electrical subcontractors, and the substation and O&M building subcontractors. Subcontractor responsibilities include:

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

2.3 Oil Storage

Bulk oil storage at the Facility consists of three fixed ASTs at the laydown yard, various portable oil storage containers, gearbox/turbine oil at the remote sites and various construction equipment. An inventory of the products stored at the Facility is shown in **Table 2.1**. All containers with capacity of 55 gallons or more are included, unless otherwise exempt from the rule.

Table 2-1: Oil Storage Inventory						
ID	Capacity (gallons)	Content	Description	Party Responsible for Oil Storage	Secondary Containment	Secondary Containment Volume (gallons)
Fixed Storage in Laydown Yard						
1	500	Gasoline	Aboveground horizontal tank	Blattner	Earthen Berm	5,984
2	1000	Diesel	Aboveground horizontal tank	Blattner	Earthen Berm	5,984
3	500	Gasoline	Aboveground horizontal tank	Blattner	Earthen Berm	5,984
Portable Storage in Laydown Yard						
4	TBD	Pendulum Oil	Portable horizontal tank	Blattner	varies	TBD

Remote Sites						
5	45	Gearbox Oil	Self contained inside turbine	Blattner	Self Contained	Self Contained
6	13	Turbine Oil	Self contained inside turbine	Blattner	Self Contained	Self Contained
7	varies	Construction equipment	varies	varies	varies	varies
8	varies	Refueling trucks	Tanks used to fuel construction equipment at Remote Sites	Blattner	varies	varies

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.

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.

2.4 Discharge Potential

The Laydown Yard will be located on relatively flat terrain and consist of a compacted gravel surface (**Figure 3**). Discharge potential at the Laydown Yard will primarily be associated with leakage of ASTs or equipment overfilling. Drainage generally flows easterly within the Laydown Yard, and sheet flows downstream to the east.

Discharge potential for the Remote Sites is primarily associated with construction equipment refueling and breakdowns (**Figure 4**). The direction of discharge and release potential at the Remote Sites varies depending upon the individual locations of the turbines, access roads and collection lines.

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 Project Location Map on a USGS map is attached as **Figure 2**. A Facility Layout Diagram is attached as **Figures 3**, which shows the location of storage tanks within the Laydown Yard and layout of the Remote Sites, respectively. The diagram also indicates the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the Facility diagram indicates the location and contents of ASTs, underground storage tanks (USTs), and transfer stations and connecting piping.

3.2 Spill Reporting Procedures

A list of Emergency Contacts is listed in **Appendix C**. A Discharge Notification Form, included as **Appendix D**, will be completed upon immediate detention 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

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.

Table 3-1: Potential Discharge Volumes and Direction of Flow				
Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of flow	Secondary Containment
Laydown Yard (Tanks #1-3)				
Tank overflow***	1 to 300	60 gal/min	South	Earthen berm
Hose leak during tank truck unloading***	1 to 300	60 gal/min	South	Earthen berm
Dispenser hose rupture	1 to 150	30 gal/min	South	Earthen berm
Tank Rupture*	1 to 1,000	500 gal/min	South	Earthen Berm
Equipment Overfill**	1 to 50	200 gal/min	South	Earthen Berm
Remote Sites				
Rupture of equipment lines	1 to 200	Gradual to instantaneous	varies	Sorbent materials
Leaking gearbox	1 to 100	5 gal/min	varies	Turbine enclosure

*Maximum discharge rate for tank rupture calculated by assuming full discharge in 2 minutes.

**Maximum discharge rate for equipment overfill calculated by assuming a 50 gallon spill and valves will be closed in 15 seconds.

***Maximum discharge rate for tank overflow and hose leak calculated by assuming a hose discharge rate of 60 gallons per minute.

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.

3.4 Containment Drainage

Drainage from the earthen berm surrounding tanks at the Laydown Yard is controlled by the one (1) foot high sides of the berm. The area is drained by Blattner by manually activated pumps. The retained rainwater is inspected by Blattner 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 structures and land-based spill response to prevent oil from reaching navigable waters and adjoining shorelines.

Double walled tanks. The ASTs will be double walled tanks to meet EPA SPCC secondary containment requirements.

Berm. In addition, the ASTs and other storage containers may be stored within an earthen berm containment area at the Laydown Yard. The bottom and sides will have an impermeable liner to restrict the flow of oil outside the containment area. The height of the berm must be a minimum of 12 inches, which provides adequate freeboard for precipitation. Secondary containment calculations are been in **Appendix F**.

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:

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

Sorbent material. Spill cleanup kits that include absorbent material, booms, and other portable barriers shall be located near the oil storage area in the Laydown Yard. Larger spill kits shall be placed throughout the project near the busiest work zones. Portable spill kits shall be located in all equipment at the Remote Sites. 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.

Safety Kleen will dispose of used oil and dirty oil absorbent pads. Blattner Energy will be the primary spill clean up contractor and Clean Harbor will be available on an on-call basis. Spill kits will also be available on the fuel truck, mechanics truck and in all Blattner pickups.

If the Owner or Operator of the Facility has had no single discharge from any oil filled operational equipment exceeding one thousand (1,000) US gallons or no two (2) discharges exceeding forty two (42) US gallons within any twelve (12) month period in the three years prior to the SPCC Plan certification date, or since becoming subject to this part if the Facility has been in operation for less than three years may choose to implement the alternate requirements listed below in lieu of general secondary containment requirements:

- Establish and document the Facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge
- Unless you have submitted a response plan under 40 CFR 112.20, provide in the plan the following:
 - An oil spill contingency plan following the provisions of 40 CFR 109
 - A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

The Owner or Operator of the Facility will engineer or update each container installation in accordance with 40 CFR 112.8(c)(8) and good engineering practices to avoid discharges. At least one of the following devices will be provided:

- High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station.
- High liquid level pump cutoff devices set to stop flow a predetermined container content level.
- Direct audible or code signal communication between the container gauger and the pumping station.
- A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. A person must be present to monitor gauges and the overall filling of bulk storage containers.
- Regular testing of liquid level sensing devices must be conducted to ensure proper operation.

3.6 Practicability of Secondary Containment

It has been determined that secondary containment is practicable at this Facility at the Laydown Yard and the Remote Sites.

3.7 Inspections, Tests, and Records

Visual inspections of tanks and containment areas are conducted monthly by the SPCC Emergency Coordinator, Kim Johnson, or designated representative. Inspection of the outside of

the container for signs of deterioration, discharges, or accumulation of oil inside containment areas is conducted. 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 or 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 on 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. This inspection will be performed annually.

Fire extinguishers will be visually inspected monthly and recharged 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. Signed inspection forms will be maintained with the SPCC Plan for a minimum of three (3) years.

3.8 Personnel, Training, and Discharge Prevention Procedures

The SPCC Emergency Coordinator is responsible for oil discharge prevention, control, and response preparedness activities at this Facility.

Oil-handling personnel will be trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the 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.

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 years from the briefing/training date.

3.9 Security

Fencing is 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 during the day, and locked tanks at night.

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.

The Laydown Yard will have security lighting and the trailer containing the tanks will be locked to deter damage caused by potential vandalism.

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. Blattner 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 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. No loading, unloading, or vehicle refueling is to occur within 100 feet of any watercourse or downstream drainage facilities. Transfer operations shall be performed according to the procedures listed in **Table 3-2** below.

Table 3-2: Fuel Transfer Procedures		
Stage		Tasks
Prior to loading/unloading		Locate spill kit and inspect that all associated items are included.
	<input type="checkbox"/>	Visually check hoses for leaks and wet spots.
	<input type="checkbox"/>	Verify the sufficient volume is available in the storage tank or truck
	<input type="checkbox"/>	Lock in the closed position all drainage valves of the secondary containment structure
	<input type="checkbox"/>	Secure the tank vehicle/set parking brakes
	<input type="checkbox"/>	Verify proper alignment of valves and proper functioning of the pumping system.
	<input type="checkbox"/>	If filling a tank truck, inspect the lowest drain and all outlets.
	<input type="checkbox"/>	Establish adequate bonding/grounding prior to connecting to the bulk fuel transfer point.
	<input type="checkbox"/>	Turn off cell phone.
	<input type="checkbox"/>	No smoking.
During loading/unloading	<input type="checkbox"/>	Driver must stay with the vehicle at all times during loading/unloading.
	<input type="checkbox"/>	Periodically inspect all systems, hoses and connections.
	<input type="checkbox"/>	When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves.
	<input type="checkbox"/>	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.
	<input type="checkbox"/>	Maintain communication with the pumping and receiving stations.
	<input type="checkbox"/>	Monitor the liquid level in the receiving tank to prevent overflow.
	<input type="checkbox"/>	Watch for any leaks or spills. Any small leaks or spills should be immediately stopped and then absorbed and disposed of properly.
After loading/unloading	<input type="checkbox"/>	Make sure the transfer operation is complete.
	<input type="checkbox"/>	Close all tank and loading valves before disconnecting.
	<input type="checkbox"/>	Secure all hatches.
	<input type="checkbox"/>	Disconnect all grounding/bonding wires from the bulk fuel transfer point.
	<input type="checkbox"/>	Make sure the hoses are drained to remove remaining oil before moving them away from the connection. Use a drip pan.
	<input type="checkbox"/>	Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.
	<input type="checkbox"/>	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.
	<input type="checkbox"/>	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

Storm water runoff from the Ocotillo Express Wind Project is discharged to name receiving waters permitted under the General Permit to Discharge Storm Water Associated with Construction Activity (WDID #713C363445).

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 California Aboveground Petroleum Storage Act (APSA) and is required to submit a Tank Facility Statement to the California Unified Program Agency (CUPA). The CUPA for the Project area is Roger Vintze, Department of Toxic Substances Control Certified Unified Program Agency 301 Heber Avenue Calexico, CA 92231, Phone: (760) 339-2777 Fax: (760) 352-1641.

4.0 DISCHARGE RESPONSE

This section describes the response and 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. Only personnel trained in this SPCC Plan and oil spill response shall participate in emergency response procedures.

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;
- Contact regulatory authorities and the response organization and report the release; and
- Collect and dispose of recovered products according to regulation.

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 (may involve less than 5 gallons of oil);
- 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;
- Trained 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. If Facility personnel feel comfortable containing 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 or 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 Clean Harbor;
- The SPCC Emergency Coordinator (or senior on-site person) will immediately call the National Response Center (800-424-8802) and California Emergency Management Agency, California State Warning Center (800-852-7550);
- 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 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 and state regulations.

4.4 Discharge Notification

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 to the National Response Center (1-800-424-8802) as well as the BLM authorized officer. The National Response Center is staffed 24 hours a day.

Any size release or threatened release of oil to navigable waters also requires immediate notification to the California Emergency Management Agency, California State Warning Center (800-852-7550).

In addition, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in **Appendix C**) whenever the facility discharges more than 1,000 gallons of oil to a navigable water in a single event, or discharges more than 42 gallons of oil to navigable waters in each of two discharge incidents within a 12-month period. The California Emergency Management Agency (Cal-EMA) under California H&S Code Section 25270.8, requires that facility management must file a report whenever a facility discharges more than 42 gallons of oil.

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, air);
- Weather conditions at the incident location;
- Any other information that may help emergency personnel respond to the incident;
- Actions being used to stop, remove, and mitigate the effects of the discharge; and
- Names and organizations that have also been contacted.