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PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

Tenaska Westmoreland Generating Station

South Huntingdon Township

Westmoreland County, Pennsylvania

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EMERGENCY RESPONSE INFORMATION

Site Specific Information

Site Name:	Tenaska Westmoreland Generating Station
Permit Type/Number:	NPDES – To Be Determined
County:	Westmoreland
Township:	South Huntingdon
Latitude:	40.180117º North
Longitude:	-79.709319 º West
Directions from nearest highway:	I-70 Exit at Smithton, Turn onto Smithton Pike – Site access located along Smithton Pike.
Emergency Response Coordinators:	See the attached list

Local Emergency Contact Telephone Numbers

Agency	Telephone No.
Pennsylvania Department of Environmental Protection (DEP) Southwest Regional Office	412-442-4000
Pennsylvania DEP 24-hr Emergency Number	800-541-2050 or 412-442-4000
Westmoreland County Emergency Services Non-Emergency 724-600-7104	**911**
Pennsylvania Emergency Management Agency	911 or 717-651-2001
Police Department	**911**
Smithton Volunteer Fire Department Smithton, Pennsylvania Non-Emergency: (**724-872-5111**)	**911**
Monongahela Valley Hospital 1163 Country Club Rd Monongahela, Pennsylvania	724-258-1000
U.S. Environmental Protection Agency, Region III	215-814-5700
U.S. Coast Guard National Response Center (NRC)	800-424-8802
Pennsylvania Fish and Boat Commission	814-445-8974
Chemical Transportation Emergency Center	800-424-9300
Poison Control Center	800-222-1222

Name of Nearest Municipal Water Authority: Municipal Authority of Westmoreland County	800-442-6829
Outside Emergency Contractors: McCutcheon Enterprises, Inc.	724-568-3623

Emergency Response Procedures

The first person on scene will assume the following responsibilities:

- Secure the area from unnecessary access and assist/stabilize personnel; de-energize and secure involved equipment from further damage.
- Alert the Emergency Response Coordinator and/or other trained facility personnel.
- Determine the following:
  - Exact source of release;
  - Identity of uncontrolled material;
  - Amount or volume of release; and
  - Direction of flow or migration and extent of dispersion.

Upon arrival, the Emergency Response Coordinator will assume the following responsibilities:

- Activate remaining facility alarms or communication systems not already engaged to notify facility personnel of emergency conditions.
- Immediately ascertain the character, source, amount, and extent of discharged material.
  - If possible threat to downstream water supply users, receptor notification using the Downstream Notification List.
- Assess direct and indirect impact the incident has or will have upon human health and the environment. Identify and notify the appropriate agencies listed above.
- Determine if facility personnel are capable of responding to the spill. Deploy personnel for response and supply personnel protective equipment and spill response equipment, as required. If outside assistance from contractors or fire department is necessary, contact immediately.
- Contain the spill.
- Isolate the source of the release and take reasonable precautions to stop continued release and prevent ancillary spills, fires, or explosions. De-energize or depressurize equipment or containers that may be contributing to release conditions.
- Monitor operations if they are interrupted due to the incident.
- Clean up the spill. The spilled material and absorbent material should be placed in a designated container.
- Coordinate efforts to treat, store, or dispose of residues, contaminated soil, etc.
- Ensure that all emergency equipment is maintained and decontaminated properly.
- Promptly submit required follow-up reports to regulatory agencies. Report information may include the following information:
  - Name of the person reporting the incident;
  - Name and location of the installation;
  - Phone number/contact information where reporting personnel can be released;
  - Date, time, and location of the incident;

- A succinct description of the incident, nature of materials or wastes involved, extent of injuries, and possible or forecast hazards to human health or the environment. Causal factors should be identified and noted, if possible;
- The estimated quantity of materials or wastes spilled or otherwise involved in the incident;
- A description or estimate of the extent of impact to land, water, and/or air;
- Volume or amount of waste materials resulting from remedial efforts and final disposition of waste; and,
- Preventative/corrective measures abating potential for recurrence.

1.0 INTRODUCTION

This Integrated Preparedness, Prevention, and Contingency (PPC) Plan and Spill Prevention, Control, and Countermeasures (SPCC) Plan (the Plan) has been prepared for Tenaska Pennsylvania Partners, LLC (TPP) for the operation of an electric generating station in Westmoreland County, Pennsylvania (the Facility).

This Plan was developed to satisfy the applicable requirements of federal and state regulatory programs, including oil pollution prevention regulations (40 CFR 112) and storm water pollution prevention regulations (Clean Streams Law, 25 PA Code 91.34). This Plan is consistent with the Pennsylvania Department of Environmental Protection (DEP) August 2005 *Guidelines for the Development and Implementation of Emergency Response Plans*, which states that the DEP "strongly recommends that regulated facilities consolidate all required plans into one single document."

The primary objectives of this Plan are to prevent spills and unauthorized releases through contingency planning and to provide details on responding to spills and releases should they occur. Implementation of this Plan will prevent the discharge of chemicals, petroleum products, and/or other materials into or upon the navigable waters of the United States. This Plan addresses potential issues associated with operation of the Facility. TPP will implement this Plan for effective action to minimize and abate hazards to human health and the environment from fire, explosion, emission or discharge of pollutants to air, soil, surface water, or groundwater.

A copy of this Plan will be kept at the Facility during operation.

1.1 Management Approvals and Certifications

Facility and Owner Identification:

Tenaska Pennsylvania Partners, LLC
1044 N. 115th Street, Suite 400
Omaha, Nebraska 68154

Management Approval:

Full approval of this Plan is extended by management at a level with authority to commit the necessary resources for Plan implementation.

Date: _____

Signature: _____
Name: Todd S. Jonas
Title: Senior Vice President

1.2 Management Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who will manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: _____ Signature: _____
Name: Todd S. Jonas
Title: Senior Vice President

1.3 Plan Amendments and Revisions

The PPC portions of the Plan will be periodically reviewed and amended, if necessary, whenever:

- Applicable department regulations are revised, or DEP otherwise requires;
- The Plan fails in an emergency;
- The installation changes in design, construction, operation, maintenance, or other circumstances, in a manner that materially increases the potential for fires, explosions or releases of toxic or hazardous constituents; or which changes the response necessary in an emergency;
- The list of Emergency Coordinators changes;
- The list of emergency equipment changes; and/or
- Upon the addition or removal of storage tanks at the Facility.

The SPCC portions of this Plan will be reviewed and amended at least every 5 years in accordance with provisions included in Appendix D. Documentation regarding periodic review, revisions, or updates is correspondingly included in Appendix D.

2.0 DESCRIPTION OF FACILITY

2.1 Description of Industrial Activity

TPP plans to engage in the operation and maintenance, of an electric generating station, electrical transmission, and wastewater conveyance activities during the life of the project. Electrical generating equipment will consist of stationary natural gas fired turbines, a steam turbine, and electricity-producing generators.

A permanent identification sign will be attached at the entrance of the access roadway to the generating station. This sign will contain the company address and a 24-hour emergency telephone number.

The Facility is located in South Huntingdon Township, Westmoreland County, Pennsylvania. Refer to Figure 1 for a map of the Facility and appurtenant components covered under this Plan.

2.2 Description of Existing Emergency Response Plans

This Plan is the initial emergency response plan prepared for this location and will be modified as necessary.

2.3 Material and Waste Inventory

Information in this section is used to evaluate the prevention, containment, mitigation, cleanup, and disposal measures which would be used in the event of a spill, discharge, explosion, or fire. There are no materials known to be used, stored, or disposed of at the site that are considered hazardous waste under the Resource Conservation and Recovery Act (RCRA) regulations; therefore, a discharge of hazardous waste is not considered likely. Waste generated at the Facility will be characterized, handled, treated, stored, and disposed of or recycled in a manner that complies with Federal, State, and local regulations. In addition, as new materials that are introduced for use at the Facility will be subject to a material review process so that pollution potential can be proactively evaluated and minimized by the alternative use of preferential, environmentally friendly products.

A list of the materials used at the Facility, which have the potential to adversely affect human health and the environment if accidentally released, will be maintained onsite and is available in Table 1. Material Safety Data Sheets (MSDS) are provided in Appendix A and will be maintained onsite for chemicals and compounds used at the Facility in accordance with the Occupational Safety and Health Administration worker right-to-know requirements, as appropriate.

During operations, the majority of the wastewater generated from the Facility will be non-contact cooling water. This wastewater may contain suspended solids, dissolved solids including chlorides and other salts, and metallic compounds containing iron and manganese. The pH of the cooling water will remain relatively constant as it is provided from the Municipal Authority of Westmoreland County. The wastewater will be discharged to the Youghiogheny River via a conveyance line and outfall structure in accordance with all applicable conditions set forth in a DEP-authorized NPDES Permit.

Ancillary construction, servicing, and maintenance operations performed at the site may also employ liquid materials including miscellaneous oils and chemicals. Quantities of these materials are projected to be minor, and it is, therefore, unlikely that such chemicals or petroleum products would unmanageably or uncontrollably impact the environment or endanger public health and safety if accidentally released. It is anticipated that petroleum products such as gasoline, diesel fuel, antifreeze, motor oil, and hydraulic oil will be primarily used and contained in mobile or portable equipment.

2.4 Pollution Incident History

Reportable pollution incidents have not occurred at this location.

2.5 Implementation Schedule for Plan Elements Not Currently in Place

Once Facility construction is completed, operational elements cited and described in this Plan that have not already been implemented will be engaged at Facility start-up. It is anticipated that some elements of the Plan will need refinement based on actual, as-built conditions and operational requirements. The Plan will be reconciled to as-built conditions and standard operating procedures at least two weeks prior to commencement of commercial operations. In addition, operations manual(s) needed for Facility operations will be reconciled to support or re-iterate the principles and procedures captured in the Plan.

Specific elements of the Plan that are not currently defined, or that will require subsequent clarification or assignment includes:

1. Facility Manager and employee position assignment.
2. Emergency Coordinator and Alternate Emergency Coordinator assignments.

3.0 PLAN IMPLEMENTATION

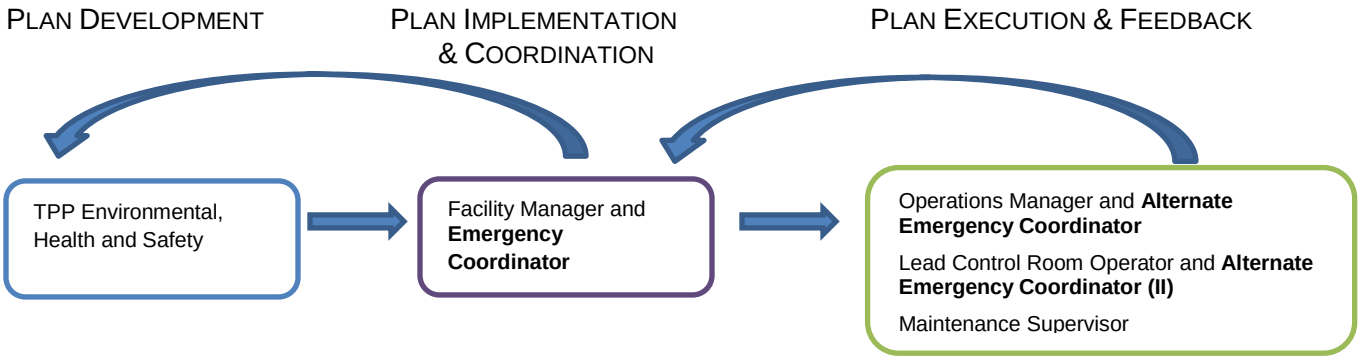
3.1 Organizational Structure of Facility for Implementation

Pollution prevention and contingency measures are generally derived as a collaborative effort involving both corporate agents drawing on knowledge from other similar conditions and facilities, combined with Facility personnel infusing site-specific knowledge and idiosyncrasy. Responsibility for developing the Plan rests with the TPP Environmental, Health and Safety Team.

Responsibility for implementation and execution of the elements of the Plan is assigned to the Facility Manager, who in turn delegates specific authority and responsibility to key personnel working within the operation. While the intent, structure, and fundamental content of the Plan are expected to remain consistent and relevant for the duration of Facility operations, periodic changes to Facility operations or identified improvements will be communicated to and through the Emergency Coordinator/Facility Manager and to the TPP Environmental, Health and Safety Team. Reasonable and sensible changes to the logistical or procedural content of the Plan will be re-drafted and issued by the TPP Environmental, Health and Safety Team for subsequent implementation by the Facility Manager/Emergency Coordinator.

In addition, Plan updates necessitated by regulations issued under the Oil Pollution Prevention; Spill Prevention, Control, and Countermeasures (SPCC) Rule will also be issued by the TPP Environmental, Health and Safety Team.

The following flow chart exemplifies the contributing entities involved in both Plan development, Plan implementation, and the feedback loop for instituting practical and efficient improvement, where appropriate.



3.2 Duties and Responsibilities:

The duties and responsibilities of individual entities or job titles are as follows:

TPP Environmental, Health and Safety Team:

The TPP Environmental, Health and Safety Team is comprised of specialists with comprehensive expertise in environmental management and compliance, and a mission focused on pollution minimization and social responsibility. This team draws upon the operational experience afforded by a fleet of power producing facilities, and is responsible for the development and maintenance of a core environmental compliance structure that conservatively protects corporate sustainability. This element of the TPP organization initiates the development of pollution prevention and compliance programs for operating or speculative assets, and is responsible for the identification of materials and wastes handled, process hazard analysis, spill-reporting requirements and procedures, and either response measures or engineering controls to alleviate or abate release scenarios. Pollution prevention and contingency planning begins with the TPP Environmental, Health, and Safety Team, and is systematically refined and optimized by input from Facility Management and Operations personnel.

Facility Manager/Emergency Coordinator:

The Facility Manager is assigned ultimate responsibility and authority to ensure the recognition and implementation of memorialized pollution prevention and contingency measures. This position is expected to provide specific training to all existing and new employees to clearly impart:

- the goals of the Plan;
- response notification and expectations;
- criteria for timely use or deployment of engineering controls for release abatement or minimization;
- availability and location of spill control materials and supplies;
- inspection criteria, scheduled and passive;
- resources to identify material hazard characteristics and basic properties; and

- agency communication protocols.

The Facility Manager is also the designated Emergency Coordinator, who will be on-call in the event of a qualifying release or emergency event. This role is responsible for, in order of priority:

- proactive procurement of emergency response materials and resources to be made available on-site for both protection of personnel, as well as initial response and abatement of emergency conditions;
- protection of life and health of both employees and potentially effected persons;
- initial protection of environmental receptors and abatement of causal circumstance (15 minutes);
- agency and authority notifications and communication;
- activation of emergency responders;
- incident documentation;
- facility security and stabilization;
- facility restoration;
- reporting; and
- delegation, as needed.

While Plan improvement is encouraged based on operational observation and logistical execution, in the event facility personnel do not recognize the need or utility of specific Plan improvements, the Facility Manager is also responsible for reviewing and updating the Plan in compliance with applicable regulation. At a minimum, cross-referenced SPCC regulations (satisfied by the amended content of Appendix D) require periodic review and update on a five-year schedule.

Alternate Emergency Coordinator:

Senior operations personnel will be identified and selected for individual job duties and responsibilities to carry out the provisions of this Plan. In particular, one individual will be selected to perform as the Alternate Emergency Coordinator in the absence of the Emergency Coordinator, while either temporarily delayed or in planned absence. When the Alternate Emergency Coordinator is acting in official capacity, all the responsibilities and authorities assigned to the Emergency Coordinator shall be assumed.

When, and if, relieved by the Emergency Coordinator, the Alternate Emergency Coordinator will assume a support role assisting with mission-specific tasks issued by the Emergency Coordinator. Operations staff on-duty during release incidents will report to either the Alternate Emergency Coordinator or the Emergency Coordinator, in that order, for purposes of both head-count and mission-specific task assignment.

Assigned Personnel:

Select personnel will be assigned inspection responsibilities to perform Facility reconnaissance and record inspection documentation required by the Plan. All personnel will be trained to perform passive inspection of Facilities to encourage situational awareness and as a function of routine operations and work duties. Discrepancies or perceived potential for an environmentally

compromising condition is to be immediately reported to supervisory personnel and the Facility Manager.

3.3 List of Emergency Coordinators

As required by 25 PA Code 265.55, there will be at least one employee, either onsite or on call, with the responsibility for coordinating emergency response measures. The Primary and Alternate Emergency Coordinators will be thoroughly familiar with this Plan, site operations and activities, the location and characteristics of materials and wastes, the location of Facility records, and the layout of the Facility.

Emergency Coordinators have the authority to commit the resources necessary to carry out the Plan and for coordinating emergency response measures. In the event of a spill or release, one of the Emergency Coordinators will be immediately notified. The following individuals have been designated to act as Emergency Coordinators: The Facility Manager is the primary Emergency Response Coordinator (ERC) for the plant site. The Operations Manager and Lead Control Room Operator are the alternate ERCs. Contact information is provided as indicated below for any response activities:

Emergency Response Coordinators		Name	Contact Telephone Numbers (Office, Mobile and Home)
Primary	Facility Manager	To be determined	
Alternate	Operations Manager	To be determined	
Alternate	Lead Control Room Operator	To be determined	

Each of the persons listed in the table will be familiar with the Plan and operations that include the location and characteristics of the various materials stored at the site and the location of emergency response equipment and supplies. The ERCs will know the reporting obligations in the event of a spill or release and have all necessary telephone numbers for reporting and summoning emergency services and outside spill response contractors. The ERCs are authorized to commit the necessary resources to carry out the provisions of this Plan in the event of a leak, spill, or other release which threatens the environment or human health and safety.

3.4 Duties and Responsibilities of the Coordinator

During an emergency, the ERC on-scene will direct all response efforts unless relieved by regulatory authority. Whether acting in full authority or performing support functions under an Incident Command structure, the ERC will facilitate and coordinate cooperative actions that may be taken by or ordered by police, fire, or other emergency response personnel.

In the event of a spill of chemical or petroleum product, the employee first becoming aware of the spill will assume the role of First Responder until the ERC can be notified. If the First Responder is unable to notify the ERC, then they will sequentially contact the Alternate ERC or the Alternate (2) ERC until an ERC is properly notified to command the emergency response. Simultaneously, the First Responder will, as immediately as possible, implement basic emergency spill response procedures such as terminating the discharge (if possible), de-energizing effected equipment; closing isolation valves; protecting and interrupting impact to conveyance structures and drop inlets, and securing the area from unintended encounter or exposure.

Upon becoming aware that an emergency situation has developed or may develop, the ERC will complete the following:

- Make a preliminary evaluation of the severity of the situation. In the case of a material spill, the ERC will determine the hazard potential of a spill by assessing, at a minimum, the following factors:
    - The source of the leakage/spill;
    - The amount of material spilled;
    - The extent of distribution and rate of expansion;
    - The sufficiency of effective containment;
    - Potential for uncontrolled or uncontained release; and
    - Hazard potential and proper personal protective equipment.
- Determine if a shutdown is required and order one if necessary.
- Determine if the area must be evacuated and order if necessary.
- Summon and deploy the necessary response personnel to control, contain, and abate the emergency if appropriate.
- If the ERC determines that emergency response services (fire, police, ambulance, etc.) must be summoned, the ERC will do so.
- If there has been a release of a reportable quantity of a substance, the DEP and the National Response Center (“NRC”) will be notified per procedures in Section 6.0.

During the emergency, the ERC will periodically re-evaluate the situation. All steps protecting employee safety will be implemented to secure those portions of the facility that are not involved in the emergency and to contain, control, and correct the emergency situation.

After the emergency situation is resolved, the ERC will be responsible for ensuring that the site is cleaned up and for arranging for the proper disposal of waste materials generated from or during the incident. The ERC will also prepare required post-incident reports.

3.5 Chain of Command

The list of key employees, by position, that must be contacted in the event of an emergency or spill is as follows:

Internal Contact/Notification List

Position Title	Contact Name	Contact Telephone Numbers
TPP		
Environmental Director		
Facility Representatives		

4.0 SPILL LEAK PREVENTION AND RESPONSE

4.1 Secondary Containment Systems

While engineering controls are specified and required to proactively prevent and manage the potential for unanticipated and uncontrolled spills and releases, it is acknowledged that the physical presence of containerized chemical products or byproducts inherently poses a risk of release. Facility design will incorporate an element of *pre-release planning* to identify those areas where potential spills or leaks are most likely to occur in conjunction with an assessment of projected direction of flow so that systematic pollution prevention measures can be designed into the facility. Projected flow direction and the location of potentially sensitive receptors will be considered when citing raw material storage, in-Facility transfer operations, process and material handling, product storage, loading and unloading facilities, and waste handling and storage so that an optimally protective configuration can be achieved. Concurrently, the recognition of environmental vulnerabilities and responding engineering controls during design and construction will be used to update the Plan immediately prior to Facility start-up. At that time, separate drawings (as-builts) and plot plans illustrating the source areas and pollution incident controls, countermeasures, or prevention practices will be incorporated into the comprehensive, Final Plan.

The Facility design will direct internal drains from process or storage areas to report to a common plant sump and oil/water separator prior to discharge from the facility to provide for spill containment and treatment, if necessary. Oil-filled equipment or conveyance systems are anticipated to be configured within curbed or bermed area containment. Containment practices in processing and handling areas will generally include floor drains, controlled storm sewer conveyance systems, or drainage swales to prevent accidental discharge.

Liquid storage areas will be constructed with containment capacity sufficient to hold the volume of the largest, single container or tank, plus additional capacity to contain precipitation. At the current time, design specifications for Facility configuration, which will dictate areas to be curbed or bermed, as well as the typical plant sump and oil/water separator have not been finalized.

Non-liquid storage areas will be designated and designed to prevent uncontrolled, contaminated runoff, leaching, or dust dispersion. Facility containment systems employing internal drains, drop-inlets, curbing, and containment dikes will be used to prevent uncontrolled and untreated release of non-liquid mobilized materials. Bulk, open containment of non-liquid reagents or materials is not contemplated in the Facility design or expected to be needed for Facility operation.

Bulk storage containers, including portable and/or mobile containers and 55-gallon drums, will be constructed or staged in secondary containment structures sized to contain the contents of the largest container, plus sufficient capacity to contain additional precipitation. Truck or vehicle loading and unloading areas will be designed and constructed with sufficient containment capacity to hold the volume of the largest tank truck or vehicle loaded or unloaded at the Facility, plus additional containment capacity for precipitation. Overhead piping will also be designed and constructed with clearance over roadways to accommodate over-sized vehicular traffic. In addition, TPP will supply or require subcontractors to supply supplemental secondary containment based on internal procedures and protocols, as deemed necessary.

If earthen berms/dikes are constructed for secondary containment using locally-available soil, the design slope will be specified to be no greater than 2:1, with sufficient thickness and compaction to contain a discharge within the boundaries of the Facility. Earthen berms/dikes will be preferentially constructed using soil exhibiting high clay content, as available. Berm/dike walls will be maintained at the appropriate height and in good condition to provide adequate retention capacity and effectiveness.

If berms/dikes are constructed using available soil stock exhibiting less favorable permeability characteristics, additional measures will be incorporated to construct adequate containment for potential spills. These measures could include, but are not limited to: additional containment (double-walled containers, vaults, plastic liners, etc.) for portable fuel tanks; plastic under oil-filled equipment where practical; and more frequent visual inspections (daily) of tanks, equipment, and piping. At a minimum, containment systems, either individually or in concert, will be sufficiently impervious to contain spilled material until removal, treatment, and/or restoration.

All personnel will be trained in proper equipment operation and procedures to reduce the likelihood of discharge during transfer or material handling operations. Piping, processing, and materials handling equipment at in-Facility transfer, process, and materials handling areas will be designed and operated to prevent spills. Containment practices, inspection of secondary containment structures, or similarly purposed engineering controls will be integrated into the periodic inspection protocols, as reflected in Inspection Forms included in Appendix B.

4.2 Material Compatibility

Although power generating facilities involve heavily industrialized equipment, piping, and machinery, technologies and materials employed are typically well understood, and have been mechanically tested and proven through a history of industry development. Nevertheless, Facility design procedures and specifications for storage or conveyance piping or structures, equipment, and secondary containment structures include systematic reconciliation of material compatibilities and corrosion characteristics between structural and consumable material or chemical interfaces. Thermal material characteristics are also included in this appraisement of compatibility of construction materials and respective content. Engineering practices include draft, interim, and final design phases, iteratively reviewed by collaborating engineers, and finally reviewed and certified by a licensed professional engineer.

Personnel will be trained to properly store and use chemicals, substances, compounds, and materials in compliance with Federal, State, and local regulation, as well as manufacturer specifications and instructions. Procedures for chemical isolation and separation, i.e. flammables compounds to be physically and distantly separated from oxidizers, will be memorialized in Standard Operating Procedures ("SOP") used for personnel training. Similarly, SOPs pertaining to the handling and management of solid waste materials will dictate waste to be uniquely segregated for efficient storage and cost-effective disposal. Specific consideration to understand, define, and negate the potential for mixing or incompatible materials as a function of either operation or maintenance, such as periodic cleaning of storage vessels and equipment will be included in engineering design criteria and will be recognized in both the Final Plan update, as well as the personnel training curriculum.

Storage tanks, drums, and tank trucks will be placarded appropriately to comply with the Globally Harmonized System for Hazard Communication ("GHS," which begins phases-in as of December 31, 2013), U.S. Department of Transportation ("DOT"), National Fire Protection Association ("NFPA"), or Resource Conservation and Recovery Act ("RCRA") regulations. Bulk oil and products storage containers employed at the Facility will be designed in accordance with industry standards, and will generally meet the following design criteria:

- Mobile or portable storage containers will be preferentially employed at the Facility to promote flexibility and convenient use of structural secondary containment areas designed into the Facility configuration;
- Material properties of either portable or fixed containers used or constructed will be reconciled with the chemical properties and compatibility characteristics of projected contents prior to use or material containment. Thermal characteristics of both the container material and content properties will also be considered. Material construction of portable containers received from out-side suppliers will be inspected prior to unloading to confirm container integrity and material compatibility. Purchasing specifications will require container/content compatibility;
- Bulk storage containers constructed of welded steel or poly-materials will meet American Petroleum Institute ("API"), Steel Tank Institute ("STI"), or American Society for Testing and Materials ("ASTM"), or applicable industry standards;
- Containers will be equipped with adequate pressure/vacuum relief;

- "Safe Fill" levels will be specified and designated on serviceable containers to maintain internal volume conservatively below the capacity limits of the container;
- Containers will be appropriately labeled to identify contents (GHS, NFPA, RCRA, and DOT); and,
- Bulk storage containers subject to the provisions of 40 CFR 112.8(c)(8) will have direct-view gauges or assemblies installed and will be continuously monitored during loading.

It is anticipated that some materials used at the Facility may be flammable. Precautions will be instituted to isolate areas where these materials are handled or stored from combustion and ignition sources. Flammable material storage cabinets or containers will be used for staging and volume distribution when not in immediate use.

4.3 Inspection and Monitoring Program

Passive, visual observation and monitoring for conditions that could result in a spill or emergency situation is standard duty expected of all Facility personnel. Daily passive and situational Facility inspection is an assigned duty of the Operations Foreman. The intent of informal inspection is to proactively forecast and identify equipment and systems that need adjusted, upgraded, repaired or replaced.

Qualified personnel will also conduct formal, documented Facility inspections of the material storage, handling, and use arrangements, requirements, procedures, and security using standardized inspection forms, such as those included in Appendix B. Qualified personnel conducting facility inspections will be trained to conduct standardized and comprehensive inspections, and will be instructed regarding the context and intent of the state and federal regulations applicable to the safe and secure operation of individual Facility components and the Facility, as a whole.

The Facility will include equipment and production areas, loading and unloading facilities, transfer pipelines, staging and storage areas, and control/maintenance facilities. Typical routine facility inspections and monitoring will include the following:

- Equipment, vessels and foundations, pipes, transfer pumps, chemical pumps, valves, catch basins and tanks will be visually inspected for leaks, seeps, evidence of spilled materials, stains, corrosion or discoloration, discernible temperature variation, need of maintenance, and excessive venting of gas from vent lines.
- The Facility will be inspected for good housekeeping practices to include neat and orderly storage of chemicals, proper labeling, prompt removal of small spills, garbage pickup, and timely off-site waste disposal.

Secondary containment units will be routinely inspected for weak/low spots, need of maintenance, evidence of spilled materials, and precipitation accumulation requiring testing prior to drainage or recovery. If accumulated precipitation is discharged, appropriate documentation of test results and compliance with relevant discharge effluent limitations will be recorded on the associated inspection form. The following inspection criteria will be recorded on Inspection Forms:

- The physical condition and liquid levels of tanks. Inspection for internal and external corrosion or deterioration, staining, bulging, drips, leaks, indentations, perimeter security, appurtenance integrity, equipment operation, and engineering controls will be recorded to document the integrity of the structure, anticipate or communicate maintenance needs, and prevent tank overflows.
- Inspection and monitoring of piping and conveyance structures for corrosion prevention/cathodic protection, pressure integrity, leaks, thermal abnormalities, adequate support, stress fractures, and functional valving/emergency control functions.
- Routine monitoring of liquid level detectors, alarm systems, call out systems, flow meters, valve positioning indicators, equipment operational lights, and pressure and temperature gauges will be conducted to initiate immediate attention and/or generate corrective actions for an emergency condition.
- Condition of the Facility property and surrounding areas (i.e., drainage, ditches, ponds, etc.) will be inspected for evidence of spilled materials.

Maintenance and replacement requirements will be established based on manufacturer specifications (preventative maintenance schedules) and on routine inspections, and will be performed as required or as needed. Records of inspections will be maintained on file at the Facility in association with this Plan for a minimum period of three (3) years. A representative blank routine inspection form is included in Appendix B.

4.4 Preventive Maintenance

Concurrent with Facility design and construction, a standardized and documented preventive maintenance program will be developed to establish and define the following:

1. identification of equipment and systems to which the program should apply;
2. periodic inspections of identified equipment and systems;
3. periodic testing of equipment and systems, (such as routine calibration of environmental monitoring equipment);
4. appropriate adjustment, repair, or replacement of parts; and
5. complete recordkeeping of the preventive maintenance activities, inspection and test results, calibration dates, repairs, replacement, and adjustments to the applicable equipment and systems.

These objectives will be supported by recognition and implementation of manufacturer recommended, regularly scheduled preventive maintenance programs for equipment, pumps, piping systems and valves, and engines. Similarly, routine inspections, testing, and assembly replacements will be completed based on manufacturer's recommendations. Equipment and structural repairs will be completed, as-needed. Required maintenance or repair will be initiated and completed in a timely manner to minimize the potential for spills or leaks.

4.5 Housekeeping Program

Good housekeeping optimizes the organization, maintenance, and efficient use of operational equipment, tools, materials, and chemicals to minimize the possibility of physical accidents or accidental neglect that can result in unintended incident or release. Good housekeeping practices will focus on the organized maintenance of open and unobstructed access around

storage facilities, process tanks, and associated transfer equipment to reduce the possibility of accidental spills, provide for ready access for inspection and maintenance, facilitate the discovery of spills, and improve response time in responding to spills. In addition, the Facility will employ housekeeping measures including, but not limited to, the following:

1. establish chemical storage areas that will be kept neat and orderly, with all containers clearly labeled to indicate content and hazard characteristics (GHS);
2. proper and timely waste management and off-site disposition;
3. preferably use dry maintenance methods to clean floors or recover dry chemicals, i.e., sweeping, vacuums, or air-movers;
4. timely and consistently recover chemicals to preclude discharge to drains or drainage ditches or airborne dispersion;
5. timely and consistently recover small liquid accumulations using absorbing or absorptive materials for managed disposal; and
6. maintain unobstructed walkways.

All on-site personnel are instructed and trained to be active participants in site housekeeping. Workmanlike standards are expected to be executed throughout the Facility. Trash and debris generated or encountered is to be collected at central locations for removal and proper disposition at an approved offsite location. Tools and equipment will be stored in properly designated areas when not in immediate use, and portable containers or equipment will be used or staged in a manner that keeps walkways, pathways, or roadways open and unobstructed.

4.6 Security

It is TPP's policy to prohibit unauthorized entry into the Facility. Facility perimeters are fenced and secured with automated, gate entry locations secured 24-hours per day. "No Trespassing" signs will be posted along the fence line. Portable and/or fixed security lighting will be positioned throughout the Facility to facilitate routine system operation and inspection and to deter vandalism or unauthorized, undetected access.

Facility access is authorized through a communication system allowing Operator screening of any proposed entrant. Visitors are only permitted entrance during business hours, and both visitors and contractors must sign in and out of the Facility at the main office.

Loading/unloading connections of conveyance pipelines or Facility storage containers will be capped or blank flanged when not in service or scheduled for standby service for an extended amount of time. Valves directing or controlling discharge from sumps, secondary containment areas, drains, drop-lets, or other maintenance appurtenances will be equipped with locking assemblies to secure the valves in the closed or de-energized, disengaged default position. Only Facility personnel will be authorized or equipped to open or engage valve configurations or control equipment allowing material or fluid transfer or discharge.

The Facility is scheduled to be equipped with a surveillance camera system relaying real-time imagery of critical operating areas and equipment, as well as security features such as the main access gate and main office entry. Streaming video data is generally transmitted to the Control Room monitors for concurrent observation in conjunction with controlled operations. These

systems are also a safety feature allowing passive monitoring of personnel during equipment operations or maintenance and allowing the Control Room to be used as a centralized communications hub processing both audio and visual systems data.

In the event of security breach or intruder alert, the Facility will be equipped with alarm systems that transmit automatic notifications to private security providers and/or local authorities. Broadcast Facility communications will be employed to instruct personnel regarding the location and description of an identified intruder or intruder(s) and to engage lock-down procedures to confirm that **internal** Facility access points are restricted, i.e. interior doors, loading/unloading dock facilities, fenced storage areas, etc. Facility personnel will be instructed and trained to avoid direct confrontation with intruders, and upon detection, initiate alarm and notification to proper authorities, i.e. police or sheriff.

4.7 External Factor Planning

External factors are those most likely to be characterized as acts of nature, or those as a result of human carelessness or vandalism. External factors that could potentially result in a discharge include:

- Severe weather conditions such as extreme wind and/or cold, torrential rainfall, or blizzards that could contribute to equipment malfunction and/or failure caused by freezing, fatigue, or stress; transformer failure; live-wire failure and uncontrolled electrocution; arcing; pipeline failure; intermittent or temporary power failure; fire; hazardous location and roadway conditions; decreased visibility; secondary containment failure; and inability to marshal a timely and effective response.

  Protective measures for severe weather will include:

  1. closely monitoring weather conditions;
  2. implementation of increased inspection, testing, and monitoring of mechanical, hydraulic, and pneumatic equipment during extreme environmental conditions;
  3. advance procurement of materials to ensure sufficient supply or material inventories, i.e. fuel, spare parts, and tooling;
  4. verification and operation-checks confirming availability and proper function of emergency back-up power;
  5. preparation for Facility and road maintenance measures to sustain access and egress;
  6. nighttime over-the-road travel restrictions;
  7. increased secondary containment inspection;
  8. stockpile additional material to reinforce and maintain erosion control measures; and
  9. supply and use of personal protective equipment.

- Vandalism, strikes, and acts of terrorism that could contribute to malfunction, destruction, and/or loss of equipment; obstructed Facility access or egress; or Facility closure.

Protective and response measures that could be implemented or integrated, *as needed*, include:

1. on-site monitoring to assess real-time social, political, and environmental conditions;
2. increased security patrol (i.e. use of contract security personnel);
3. enhanced fencing, such as the addition of razor wire, visibility screens, and/or electrified fencing to secure Facility perimeters;
4. integration of additional security cameras and automated door lock systems;
5. security escorts; and
6. investigation and identification of alternative equipment, resources, facilities, and manpower.

4.8 Employee Training Program

Personnel training is scheduled to occur within the first week of initial employment and at least annually, thereafter. Refresher training will address safety aspects and procedures, as well as incorporate elements of specialized, site-specific contingency training to reinforce employees' understanding of spill leak prevention and response recognition and procedures. Training programs used by TPP are designed to ensure that Facility personnel and visitors are able to respond effectively to emergencies by familiarizing them with emergency procedures and the following information:

- General Facility operations:
  - Changes in Facility design or operation;
  - Historical discharge incidents; and
  - Potential discharges and component failures response and prevention.
- PPC and SPCC regulations;
- Plan requirements;
- Access to the Plan
- Secondary Containment:
  - Regulations and requirements;
  - Maintenance and best management practices;
  - Passive inspection/situational awareness;
  - Valve configurations;
  - Discharge limitations and requirements; and
  - Waste handling and disposal.
- Spill Prevention:
  - Inspections and monitoring;
  - Situational awareness;
  - Proper equipment operation and maintenance;
  - Management of change/operational improvement process;
  - Personal and collective responsibility;
  - Housekeeping/best management practices;

- Container/vessel disposition, integrity, identification, and use; and
- Pollution prevention policies and programs.

- Emergency and Spill Response:
  - Emergency procedures;
    - Spill notification hierarchy (internal and external);
    - Spill reporting requirements and guidelines (local, state and federal);
  - Initial Response Actions;
    - Assessment: fires, explosions, or release; and
    - Evacuation procedures.
  - Spill response safety;
    - Personal protective equipment availability and use;
  - Communications and alarm systems;
  - Emergency equipment (where applicable);
  - Common process valve locations; and
  - Shut down options and procedures
  - Discharge cleanup procedures.
- Process and Material Handling:
  - Overview of safety and health hazards associated with processes and materials;
  - Material compatibility and containerization;
  - Safety Data Sheets;
  - Personal protective equipment;
  - Chemical labeling requirements;
  - Chemical, material, or reagent procurement review process (pollution prevention program);
  - Management of Change process;
  - Waste management and handling protocol.
- Petroleum Handling:
  - SPCC intent and provisions/components;
  - Potential for inadvertent discharge;
  - System component failure(s);
  - Precautionary measures;
  - Operation and maintenance of equipment to prevent oil discharges;
  - Discharge procedure protocols;
  - Applicable spill prevention (State & Federal) laws, rules, and regulations;
  - General Facility operations; and
  - The contents of the Plan and applicable pollution control laws, rules, and regulations.
- Facility inspections:
  - Inspection frequency;
  - Inspecting, repairing, or replacing emergency or monitoring equipment;
  - Inspection reports; and
  - Components of the Facility inspections.

In addition, awareness information will be supplied relative to applicable pollution control laws, rules, and regulations. Prevention briefings are also scheduled at regularly scheduled safety meetings to repeatedly reiterate spill prevention practices and procedures for responding properly and rapidly to spills.

Training records will be maintained at the Facility and in Appendix C of this Plan for a minimum period of three (3) years. A sample Training logs is provided in Appendix C.

5.0 COUNTERMEASURES

Effective countermeasures depend on premeditated action followed by decisive response and speed. When release occurs, the series of premeditated response actions should be to: Control, Contain, and Collect. Initially, *control* and interrupt the release flow at the source or *control* immediate impact a sensitive receptor or migration pathway; once *control* is achieved, *contain* dispersion or impacted condition, and finally *collect* and manage impacted materials, as well as information, to *conclude* the event response and reporting.

5.1 Countermeasure to be Undertaken by Facility

Facility personnel will be best equipped to identify a spill or release and implement immediate response actions to control release and dispersion effects. The intent is to interrupt the release flow at the source or at a feel location, such as a valve, that supplies the source of a release to shut off flow. In addition, and sometimes simultaneously, it may be necessary to quickly assess and deter flow from encountering or intercepting a particular migration pathway or flow path, such as a culvert or drop inlet that could exacerbate migration velocity.

In either circumstance, mitigation measures to control flow and/or imminent impact are immediately critical, and will likely dominate the first several minutes of an emergency situation. During these moments when flow and imminent harm is to be interrupted using any viable means readily available, notification and alarm is to be simultaneously issued to invoke cascading Response Measures.

In the event of a spill, it is very important that the material be contained to the maximum extent possible in order to minimize the effect of the spill and the cost of clean-up. **NOTE: ANY SHEEN ON A WATERBODY (STREAM, RIVER, or WETLAND) IS A REPORTABLE RELEASE.** Once the spill is contained, the spilled material and contaminated material must be collected and physically removed from the area. In some cases, with certain materials, it may be possible to neutralize a spilled material in place without removal. Finally, the spilled material and contaminated soil, clean-up material, etc., must be disposed of properly.

As described in Section 4.0 of this Plan, spills or leaks may occur from storage facilities, process tanks, transfer equipment, or other containers. Quantities of potential leaks are variable depending upon the cause and storage container involved. A Non-Emergency Spill (i.e., a spill that is controllable with no threat of entering the soil or water) is generally described as involving less than 55 gallons that is contained and controlled in the immediate area of the spill.

The first person to observe and respond to a Non-Emergency Spill is assigned the following responsibilities:

- Secure the source of the spill; close feed valves, shut off pumps, raise or invert discharge points, etc.
- Inform the Control Room Operator, Lead Supervisor or Shift Supervisor that a spill has occurred, the location of the spill, and pending response activities;
- Quickly retrieve absorbent material(s) and contain the spill/secure critical migration pathways;
- Once the flow is secured, clean up the remaining spill with absorbent material (dry clean-up);
- Promptly remove spent absorbent materials for proper disposal in a designated, labeled, and secured container; and
- Inform the ERC.

For a catastrophic tank failure to result in a major release, simultaneous failure of both a storage tank and the secondary containment would be required. A simultaneous failure is extremely unlikely. In the event of this type of Emergency Spill (i.e., an uncontrollable release that has reached or could reach soil and/or water) the following procedure will be executed:

- The first person to observe and respond to an Emergency Spill will assume the following responsibilities:
  - Secure and isolate the area, equipment, and personnel from injury or further damage;
  - Notify the ERC and/or other trained facility personnel;
  - Determine the following:
    - Exact source of the spill;
    - Identity of material;
    - Amount spilled; and
    - Direction of flow and extent of spreading.
- Upon arrival, the ERC will assume the following responsibilities:
  - Immediately ascertain the direct and indirect effects that the incident will have upon human health and the environment. Notify the agencies listed in subsection 6.2 of this Plan;
  - Determine if facility personnel are capable of responding to the spill. Deploy personnel for response, supplying personal protective equipment and spill response equipment, as required. If outside assistance from contractors or fire department is necessary, contact immediately;
  - Contain the spill;
  - Stop the source of the spill and take reasonable precautions to prevent further spills or fires or explosions;
  - Monitor operations if they are interrupted due to the incident;
  - Clean up the spill. The spilled material and absorbent material should be placed in a designated container;
  - Coordinate efforts to provide for treating, storing, or disposing of residues,

contaminated soil, etc.;

- Ensure that all emergency equipment is maintained and decontaminated properly; and,
- Promptly submit required incident reports to regulatory agencies.

5.2 Countermeasures to be Undertaken by Contractors

The following company provides contract environmental, emergency response services and, should their services be required, will be under contract to provide additional specialized assistance during an emergency.

Company:	**McCutcheon Enterprises, Inc.**
Address:	**250 Park Road,** **Apollo, Pennsylvania**
Telephone Number:	**724-568-3623**
Equipment and Services:	**Hazardous Materials Emergency Response**

Apollo, Pennsylvania is within 40 miles of Westmoreland County. Initial personnel response time is expected to be within 60 minutes. Response time to provide heavy equipment and supplemental response supplies and materials is expected to be 90 to 120 minutes.

5.3 Internal and External Alarm Systems

Internal communication systems and alarms will be used to provide immediate emergency instruction (voice or signal) to Facility personnel, and external telephone and security alarm systems are anticipated to be used to summon emergency assistance from local police or fire departments. Fire, police, and emergency service can be summoned by calling the numbers provided in subsection 6.2 of this Plan.

Internal and external communication will be maintained using a combination of both hard-line and mobile telephone systems. Internal voice communication may also integrate a Facility radio/dispatch system for localized communication. The Facility design includes a Facility-wide fire detection and alarm system that will be used to communicate internal emergency conditions, as well as provide emergency notification to local municipal or contracted emergency responders, i.e. police, fire, or McCutcheon emergency response.

Facility control is centralized in the Control Room where information systems constantly acquire and relay data that is used to optimize Facility production. These remote-operation systems are under constant evaluation to identify and prevent malfunction, and provide simultaneous notification of emergency conditions through equipment alarm settings and automated shut-down functions. The Control Room operator will likely be in the primary position to provide Facility-wide notifications describing emergency conditions, will provide assistance summoning external support services, and will be able to assist with isolating emergency conditions by engaging automated control systems affecting the situation.

5.4 Evacuation Plan

This subsection describes the evacuation plan for Facility personnel when there is a possibility that evacuation could be necessary. Periodic drills or table-top exercises will be conducted annually (in conjunction with associated training events described in Section 4.7 of this Plan), to evaluate the effectiveness of this evacuation plan. In the unlikely event that the Facility must be evacuated, the ERC will alert and instruct personnel and any registered (signed-in) visitors to assemble at the pre-designated muster location for head-count and attendance. A muster

location will be established at a generally up-wind, Facility perimeter location, and will be identified on evacuation plan maps posted at each Facility exit. Once the ERC verifies that all personnel onsite are accounted for, contact information will be recorded for reporting purposes and unnecessary personnel and visitors will be released and instructed to exit the area.

If an emergency situation requires evacuation of personnel, the ERC will implement the following evacuation procedures:

1. Provide evacuation instructions to Facility personnel using the Facility radio/dispatch system and broadcast alarms, as appropriate.
2. Personnel will evacuate the Facility as follows:
   a. If downwind of incident: Evacuate using the most accessible route perpendicular to the prevailing wind direction.
   b. If upwind of incident: Evacuate in an upwind direction.
3. Personnel will assemble at the Facility muster point identified by the ERC, or at an alternative muster location upwind of the incident if safety concerns preclude use of the pre-designated muster location. All personnel and visitors are to remain at the muster location until the ERC accounts for all personnel onsite.
4. The names of evacuated personnel, contact information, and the destination of evacuees transported to hospitals, etc., for treatment will be recorded by the ERC, first aid personnel, or fire officials.

5.5 Emergency Equipment Available for Response

Available emergency equipment and procedures for maintenance and decontamination of emergency equipment will be reviewed annually to confirm that equipment and supply provisions are sufficient for practical response to non-Emergency Spills and/or preliminary abatement in the event of an Emergency Spill. Equipment will be tested and maintained, as necessary, to assure proper operation in time of emergency, and supplies will be inventoried during routine inspections. After an emergency, PPE will be decontaminated, cleaned, and re-fit for its intended use before normal operations resume. Durable equipment such as shovels or fire extinguishers will be decontaminated using absorbent materials or rags. Waste materials will be properly drummed or containerized for off-site characterization and disposal.

The following emergency equipment and supplies will be available on site and stored at locations accessible to incident responders:

- Absorbent pads;
- Absorbent booms;
- Oil dry;
- Over-pack drums;
- 5-gallon pails with lids;
- Nitrile (or equivalent gloves) in a variety of sizes;
- Chemical resistant gloves;
- Goggles;
- Face shields;
- Drums;
- Impervious coveralls (Tyvek, Saranex, or other);

- Shovels;
- Fire extinguishers and other fire control equipment; and
- Mobile telephones or radios.

The above list is not necessarily exhaustive and additional equipment or supplies may be stored or used at the Facility upon identification of need or practicality. In addition, procedures for maintenance and decontamination of emergency equipment will be determined by operations staff and listed in this subsection prior to start up.

6.0 EMERGENCY SPILL CONTROL NETWORK

6.1 Arrangements with Local Emergency Response Agencies and Hospitals

Arrangements will be made prior to Facility startup to designate primary and support emergency response services. Information will be provided to police, fire departments, emergency response teams, and the Westmoreland County Emergency Services Department to define and describe the Facility configuration; operation processes; hazardous material properties, storage, and handling provisions; locations where personnel would normally be working, entrance and egress locations and access routes, and possible evacuation routes and muster points. Ancillary support facilities, such as local hospitals or medical transport providers, will be identified and contracted in advance of Facility operation, if needed.

The following agencies can be contacted and provided with a copy of this Plan, at the discretion of the ERC:

Local Emergency Agency	Name/Address	Telephone
Westmoreland County Emergency Management (Services Department)	108 Vannear Ave Greensburg, Pennsylvania 15601	911
Smithton Fire Department	Smithton, Pennsylvania	911
Rostraver West Newton Emergency Services Ambulance	138 Motordome Rd West Newton, Pennsylvania 15089	911
Monongahela Valley Hospital	1163 Country Club Rd Monongahela, Pennsylvania	724-258-1000
Westmoreland County Local Emergency Planning Committee	911 Public Safety Road Greensburg, Pennsylvania 15601	724-838-7307

Subsection 6.2.2 of this Plan lists local emergency response agencies to be contacted in the event of an emergency or reportable spill. In the unlikely event that a widespread emergency occurs, the **Westmoreland County Emergency Services Department** is contacted **first (911)**, and this agency dispatches coordinated emergency response agencies through a standardized communications network.

The Westmoreland County Emergency Services Department is notified through the 911 system. Routing of injured persons will be performed by emergency medical services personnel based on the number and type of injuries requiring treatment. All emergency response departments should be reached through the 911 system.

6.2 Notification Requirements

6.2.1 State and Federal Notification Procedures

State (DEP) Notification Requirements:

Three major laws require DEP to be notified of a spill or release of material to the environment:

1. The Pennsylvania Clean Streams Law at 25 PAC 91.33 requires that when any pollutant is discharged into surface or groundwater, including sewers, drains, and ditches, the person spilling the substance or the person owning the premises from which the substance is spilled must notify DEP by telephone immediately and, if reasonably possible, notify known downstream users of the waters. **NOTE THAT THERE IS NO REPORTABLE QUANTITY (RQ) THRESHOLD AND PRACTICALLY ALL SUBSTANCES (INCLUDING GROUNDWATER) ARE REPORTABLE.**
2. The Solid Waste Management Act at 25 PAC 262a.43 requires the generator or the transporter to notify DEP immediately by telephone at **800-541-2050** if there is a spill of a hazardous waste which affects surface water or groundwater regardless of amount. If there is no effect on water, quantities spilled in excess of the following RQs must be reported:
    - Liquid hazardous waste or liquids that become hazardous waste when spilled or discharged when the quantity equals or exceeds the RQ for the waste contained in 40 CFR 302.4 or 10 gallons, whichever is more stringent (liquids are flowable substances which contain less than 20% solids by dry weight); and.
    - Solid hazardous waste or solids that become hazardous wastes when spilled or discharged when the quantity equals or exceeds the RQ for the waste contained in 40 CFR 302.4 or 500 pounds, whichever is more stringent.

    Conservatively, spills of waste (hazardous waste) in excess of five gallons should be assumed to be reportable.
3. The Pennsylvania Storage Tank Act requires releases from underground and aboveground storage tanks be reported to DEP by the owner/operator.

Note that the regulatory requirement to report a release to DEP is assigned to the person responsible for the discharge; it is not the responsibility of emergency responders. In the event of water runoff from fire-fighting activities, the fire department or agency is technically responsible for the discharge. For this reason, DEP asks to be notified when fire-fighting activities may have an effect on a stream. However, regardless of the regulatory requirement, DEP encourages voluntary reporting in the following situations:

- All spills in excess of five gallons of any hazardous material;
- All petroleum spills of five gallons or more with potential to pollute;
- Air pollution incidents where there may be a release of toxic materials or where smoke from a fire may create a public nuisance; and,
- Incidents which involve illegal/improper disposal of any material.

DEP prefers that notifications be made to the appropriate regional office:

Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745
Emergency Notification Number: **412-442-4000**

DEP also maintains a statewide toll free number, **1-800-541-2050**, which serves as a backup to the regional Emergency Notification Number.

Federal Spill Reporting Requirements

The following spills require immediate notification (within 15 minutes) to the NRC:

- Discharges of oil to navigable waters in quantities that may be harmful (e.g., violate applicable water quality standards; 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); [40 CFR 110]
- Any spill or discharge of a Hazardous Substance found at 40 CFR 117.3 equaling or exceeding the RQ of the discharged substance in any 24-hour period to waters of the state on or from the Facility; and [40 CFR 117]
- Any release from the Facility (other than a federally permitted release or application of a pesticide) of a Hazardous Substance listed at 40 CFR 302.4 into the environment (land, water, or non-indoor air), regardless of whether or not exposure to persons occurs inside or outside of the Facility boundaries, in a quantity equal to or exceeding the RQ in any 24-hour period. [40 CFR 302.6]

National Response Center
U.S. Coast Guard
2100 Second Street, SW
Washington, DC 20593

1.800.424.8802 (toll free)
202.267.2675 (direct phone)
202-267-1322 fax
(the NRC operates 24 hours a day, 7 days a week, 365 days a year)

Immediate notification of the State Emergency Response Commission ("SERC") and the Local Emergency Planning Committee ("LEPC") is required if a release occurs equal to or greater than the RQ of an Extremely Hazardous Substance ("EHS") listed at 40 CFR 355 Appendices A and B or a Hazardous Substance listed at 40 CFR 302.4 and results in exposure to persons outside of the boundaries of the Facility. As soon as practicable after the notification, a written follow-up emergency notice (or notices, as more information becomes available) shall be submitted to the SERC and LEPC. [40 CFR 355]. Contact information for the SERC and LEPC is as follows:

State Emergency Response Commission

Pennsylvania Emergency Management Council
c/o Pennsylvania Emergency Management Agency
2605 Interstate Drive
Harrisburg, Pennsylvania 17110-9364
717-651-2121 phone
717-651-2240 fax

Westmoreland County Local Emergency Planning Committee
911 Public Safety Road
Greensburg, Pennsylvania 15601
724-838-4307

Within 15 days after the verbal notification report of a spill, a follow-up report must be submitted to DEP and U.S. EPA. If a facility discharges more than 1,000 gallons of oil into navigable waters or more than 42 gallons of oil in each of two discharges within 12 months, a follow-up report must be submitted to DEP and U.S. EPA within 60 days: [40 CFR 112.4]

Regional Administrator
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

and

Director - DEP Southwest
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745
412-442-4000

This report is to be submitted by the ERC. The report shall include the following:

- Name, address and telephone number of the individual filing the report;
- Name, address, telephone number, and description of the Facility;
- Date, time and location of incident;
- A brief description of the cause of the incident;
- Estimated quantities, by weight or volume, of materials involved and of those stored onsite;
- An assessment of any contamination of land, water, or air that occurred due to the incident;
- The estimated quantity and disposition of recovered materials that resulted from the incident;
- A description of corrective actions and countermeasures taken to manage the incident; and
- A description of actions the Facility intends to take to prevent a similar occurrence in the future.

The ERC is responsible for maintaining records of spill events and for determining whether an event is reportable and whether notification requirements have been triggered.

6.2.2 Notification Lists

If the ERC determines that the Facility has had an emission, discharge, spill, fire, or explosion that could threaten human health or the environment, he will contact and report as necessary his findings to the appropriate agencies listed below.

Agency	Telephone No.
Pennsylvania DEP Southwest Regional Office	412-442-4000
Pennsylvania DEP Central Office (Harrisburg)	1-800-541-2050
Westmoreland County Emergency Services	911
Pennsylvania Emergency Management Agency	911 or 717-651-2001
Police Department	911
Smithton Volunteer Fire Department	911
U.S. Environmental Protection Agency, Region III	215-814-5700
U.S. Coast Guard National Response Center (NRC)	800-424-8802
Pennsylvania Fish and Boat Commission	814-445-8974
Chemical Transportation Emergency Center: Chemical Exposure Information	800-424-9300
Poison Control Center	800-222-1222

When calling an agency listed above, the following information should be available:

- Company name and location;
- Name of person reporting the spill, title, and telephone number;
- The type of material released and media affected;
- Estimated or exact (if known) quantity of material released (i.e., gallons, pounds, etc.);
- A brief description of the incident, including type of incident, cause of incident, nature of hazardous material involvement, and possible hazards to human health and the environment outside the facility;
- Probable source and location of the spill source;
- Date and time of the spill;
- Location of entry point into surface water and amount reaching the waterway (if applicable);
- The name of the receiving water and the downstream water bodies of which it is a tributary;
- Has the release been stopped;
- If not, when will it be stopped;
- Mitigation/containment actions initiated;

- Direction of material movement;
- Potential population affected by the release and evacuation needs;
- Name of person to contact on behalf of the company who will be at the scene and will be directing response measures;
- Names of individuals/organizations that have been contacted;
- Telephone number where the on-scene coordinator can be reached; and,
- The extent of injuries, if any.

6.3 Downstream Notification Requirement for Storage Tanks

The Storage Tank and Spill Prevention Act (Act 32 of 1989) requires owners of aboveground storage tank facilities with a total aboveground capacity greater than 21,000 gallons of regulated substances to develop and submit a Spill Prevention Response (SPR) Plan to DEP. Regulated substances include petroleum products and hazardous substances. Additionally, facilities subject to the rule must submit annual written notifications to downstream surface water users within 20 miles of the facility and an annual update to the local emergency management agency.

The Facility does not intend to have an aggregate aboveground storage capacity of more than 21,000 gallons of regulated substances. Therefore, it is not expected that the Facility will be subject to the downstream notification requirements for storage tanks.

If the aggregate aboveground storage capacity at the Facility exceeds 21,000 gallons of regulated substance, the following list of downstream water users shall be used for the annual written notification requirement. The Facility is located in South Huntingdon, Westmoreland County, Pennsylvania. According to USGS maps and the DEP's eMap website (http://www.emappa.dep.state.pa.us), the nearest potable surface water intake is located on the Youghiogheny River near McKeesport, Pennsylvania, more than 20 (twenty) miles downstream from the Facility.

Downstream Water User	Contact Information
Municipal Authority of the City of McKeesport	Phone Number: 412-673-9701

APPENDIX A

MATERIAL SAFETY DATA SHEETS (MSDS)

(MSDS to be added upon completion of chemical inventory – pending)

APPENDIX A
CHEMICALS USED AT TWGS

Product	Hazardous Chemical	Storage Type	Storage Location	Quantity (Gallons)
Fuel Chemicals				
No. 2 Fuel Oil	No. 2 Fuel Oil			
Fire Pump Fuel	No. 2 Fuel Oil			
In-Process Chemicals				
ST Step-up Transformer (Mineral Oil)	Insulating Mineral Oil			
CT Step-up Transformers (4) (Mineral Oil)	Insulating Mineral Oil			
Unit Auxiliary Transformers (2) (Mineral Oil)	Insulating Mineral Oil			
Static Start Transformers (2) (Mineral Oil)	Insulating Mineral Oil			
Electrical Equipment Enclosure Transformers (2)	Insulating Mineral Oil			
Combustion Turbine Lube Oil Tanks (3)	Lube Oil			
Steam Turbine Lube Oil Tank	Lube Oil			
Cooling Tower Transformers (2)	Insulating Mineral Oil			
Water Treatment Transformers (2)	Insulating Mineral Oil			
Drum Oil Storage	Lube Oil / Fuel Oil / Used Oil / Used Oil Filters / Spill Clean-Up			
Hydrogen Storage	Hydrogen			
Circulating Water	33% Ethylene Glycol			
Ammonia Storage	Anhydrous Ammonia			
Cycle Feed Chemicals				
HRSG HP Phosphate Solution 3100	Sodium Hydroxide			
HRSG HP Phosphate Solution 2100	Sodium Hydroxide			
HRSG Condensate Oxygen Scavenger	Carbonic Dihydrazide			
Condensate Amine	Morpholine, Cyclohexamine			

APPENDIX A
CHEMICALS USED AT TWGS

Product	Hazardous Chemical	Storage Type	Storage Location	Quantity (Gallons)
Circulating Water Chemicals				
Sodium Hypochlorite	12.5% NaOCl			
Sulfuric Acid	H_2SO_4			
Circulating Water Corrosion Inhibitor	Tetrapotassium Pyrophoshate			
CCW Biodispersant	Sodium Molybdate Sodium Hydroxide			
Raw Water Treatment Chemicals				
Sodium Hypochlorite	12.5% NaOCl			
Coagulant - Alum	$Al_2(SO_4)_3$			
Anionic Polymer	Isoparaffinic Petroleum Distillate			
Cycle Makeup Treatment Chemicals				
Demineralized Acid	H_2SO_4			
Demineralized Caustic	50% NaOH			
Wastewater Treatment Chemicals				
Sodium Bisulfite	$NaHSO_3$			
CO_2				
CO_2 Storage Tank (3)				
CO_2 Bottles				

APPENDIX B

INSPECTION FORMS

1. Save this form using the following naming convention:
   - **Task Title _yyyy_mm. doc**' (e.g. Aboveground Tank and Containment Area Inspections 2013_01.doc').
   - Attach the completed form to the PPC Plan or relevant environmental manual.
2. For information on filing and the onsite/offsite retention requirements, please refer to the PPC Plan.

Facility Name/ID:			
Location:		**Date (yyyy/mm/dd):**	
W/O #:		**Inspected By**	

Tank ID #	**Capacity / Volume:**				**Tank Liquid Level:** *e.g. 2/3 full*	
☐ Lube ☐ Used - Oil ☐ Production Oil ☐ Diesel ☐ Gasoline ☐ Waste ☐ Oily - Water ☐ Brine ☐ Methanol ☐ Inhibitor ☐ Condensate ☐ Ambitrol ☐ Other	**Conditions**	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**	
	Leaks/Cracks (pumps, gaskets valves, flanges, seams, welds)	☐	☐	☐		
	Damage/deterioration/corrosion	☐	☐	☐		
	Signage correct and visible	☐	☐	☐		
	Supports (Damage, deterioration)	☐	☐	☐		
	Foundation (Cracking, Spalling, settlement, pitting)	☐	☐	☐		
	Interstitial Space pressure correct and free of liquid	☐	☐	☐		

Containment Area	**Description:**			
Conditions	**Yes**	**No**	**N/A**	**Repairs / Corrective Actions Required**
Leaking/cracks/damage/deterioration or erosion	☐	☐	☐	
Sealed /Plugged Drain Valve	☐	☐	☐	
Water/Spilled liquid/surface sheen presence or discharging	☐	☐	☐	
Other	☐	☐	☐	

Aboveground Piping, Hoses, Valves, Joints, Load Lines, Drip Pans, Pipe Supports (Fluid Transfer)				
Conditions	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
Leaking, cracks, damage or deterioration	☐	☐	☐	
Load line clean/spill free	☐	☐	☐	
Buried lines with exposed area:	☐	☐	☐	

Tank ID #	**Capacity / Volume:**				**Tank Liquid Level:** *e.g. 2/3 full*	
☐ Lube ☐ Used - Oil	**Conditions**	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**	
	Leaks/Cracks (pumps, gaskets valves, flanges, seams, welds)	☐	☐	☐		
	Damage/deterioration/corrosion	☐	☐	☐		

☐ Production Oil ☐ Diesel ☐ Gasoline ☐ Waste ☐ Oily - Water ☐ Brine ☐ Methanol ☐ Inhibitor ☐ Condensate ☐ Ambitrol ☐ Other	Signage correct and visible	☐	☐	☐	
	Supports (Damage, deterioration)	☐	☐	☐	
	Foundation (Cracking, Spalling, settlement, pitting)	☐	☐	☐	
	Interstitial Space pressure correct and free of liquid	☐	☐	☐	
Containment Area	**Description:**				
Conditions		**Yes**	**No**	**N/A**	**Repairs / Corrective Actions Required**
Leaking/cracks/damage/deterioration or erosion		☐	☐	☐	
Sealed /Plugged Drain Valve		☐	☐	☐	
Water/Spilled liquid/surface sheen presence or discharging		☐	☐	☐	
Other		☐	☐	☐	
Aboveground Piping, Hoses, Valves, Joints, Load Lines, Drip Pans, Pipe Supports (Fluid Transfer)					
Conditions		**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
Leaking, cracks, damage or deterioration		☐	☐	☐	
Load line clean/spill free		☐	☐	☐	
Buried lines with exposed area:		☐	☐	☐	
Other		☐	☐	☐	
Tank ID #	**Capacity / Volume:**				**Tank Liquid Level:** *e.g. 2/3 full*
☐ Lube ☐ Used - Oil ☐ Production Oil ☐ Diesel ☐ Gasoline ☐ Waste ☐ Oily - Water ☐ Brine ☐ Methanol ☐ Inhibitor ☐ Condensate ☐ Ambitrol ☐ Other	**Conditions**	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
	Leaks/Cracks (pumps, gaskets valves, flanges, seams, welds)	☐	☐	☐	
	Damage/deterioration/corrosion	☐	☐	☐	
	Signage correct and visible	☐	☐	☐	
	Supports (Damage, deterioration)	☐	☐	☐	
	Foundation (Cracking, Spalling, settlement, pitting)	☐	☐	☐	
	Interstitial Space pressure correct and free of liquid	☐	☐	☐	
Containment Area	**Description:**				
Conditions		**Yes**	**No**	**N/A**	**Repairs / Corrective Actions Required**

Leaking/cracks/damage/deterioration or erosion	☐	☐	☐	
Sealed /Plugged Drain Valve	☐	☐	☐	
Water/Spilled liquid/surface sheen presence or discharging	☐	☐	☐	
Other	☐	☐	☐	
Aboveground Piping, Hoses, Valves, Joints, Load Lines, Drip Pans, Pipe Supports (Fluid Transfer)				
Conditions	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
Leaking, cracks, damage or deterioration	☐	☐	☐	
Load line clean/spill free	☐	☐	☐	
Buried lines with exposed area:	☐	☐	☐	
Other	☐	☐	☐	

Tank ID #	**Capacity / Volume:**				**Tank Liquid Level:** *e.g. 2/3 full*	
☐ Lube ☐ Used - Oil ☐ Production Oil ☐ Diesel ☐ Gasoline ☐ Waste ☐ Oily - Water ☐ Brine ☐ Methanol ☐ Inhibitor ☐ Condensate ☐ Ambitrol ☐ Other	**Conditions**	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**	
	Leaks/Cracks (pumps, gaskets valves, flanges, seams, welds)	☐	☐	☐		
	Damage/deterioration/corrosion	☐	☐	☐		
	Signage correct and visible	☐	☐	☐		
	Supports (Damage, deterioration)	☐	☐	☐		
	Foundation (Cracking, Spalling, settlement, pitting)	☐	☐	☐		
	Interstitial Space pressure correct and free of liquid	☐	☐	☐		
Containment Area	**Description:**					
Conditions		**Yes**	**No**	**N/A**	**Repairs / Corrective Actions Required**	
Leaking/cracks/damage/deterioration or erosion		☐	☐	☐		
Sealed /Plugged Drain Valve		☐	☐	☐		
Water/Spilled liquid/surface sheen presence or discharging		☐	☐	☐		
Other		☐	☐	☐		
Aboveground Piping, Hoses, Valves, Joints, Load Lines, Drip Pans, Pipe Supports (Fluid Transfer)						
Conditions		**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**	
Leaking, cracks, damage or deterioration		☐	☐	☐		
Load line area clean and spill free		☐	☐	☐		
Buried lines with exposed area:		☐	☐	☐		
Other		☐	☐	☐		

Tank ID #	**Capacity / Volume:**				**Tank Liquid Level:** *e.g. 2/3 full*	
☐ Lube ☐ Used -	**Conditions**	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**	

☐ Oil ☐ Production Oil ☐ Diesel ☐ Gasoline ☐ Waste ☐ Oily - Water ☐ Brine ☐ Methanol ☐ Inhibitor ☐ Condensate ☐ Ambitrol ☐ Other	Leaks/Cracks (pumps, gaskets valves, flanges, seams, welds)	☐	☐	☐	
	Damage/deterioration/corrosion	☐	☐	☐	
	Signage correct and visible	☐	☐	☐	
	Supports (Damage, deterioration)	☐	☐	☐	
	Foundation (Cracking, Spalling, settlement, pitting)	☐	☐	☐	
	Interstitial Space pressure correct and free of liquid	☐	☐	☐	
Containment Area	**Description:**				

Conditions	**Yes**	**No**	**N/A**	**Repairs / Corrective Actions Required**
Leaking/cracks/damage/deterioration or erosion	☐	☐	☐	
Sealed /Plugged Drain Valve	☐	☐	☐	
Water/Spilled liquid/surface sheen presence or discharging	☐	☐	☐	
Other	☐	☐	☐	
Aboveground Piping, Hoses, Valves, Joints, Load Lines, Drip Pans, Pipe Supports (Fluid Transfer)				
Conditions	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
Leaking, cracks, damage or deterioration	☐	☐	☐	
Load line clean/spill free	☐	☐	☐	
Buried lines with exposed area:	☐	☐	☐	
Other	☐	☐	☐	

Tank ID #	**Capacity / Volume:**			**Tank Liquid Level:** *e.g. 2/3 full*	
☐ Lube ☐ Used - Oil ☐ Production Oil ☐ Diesel ☐ Gasoline ☐ Waste ☐ Oily - Water ☐ Brine ☐ Methanol ☐ Inhibitor ☐ Condensate ☐ Ambitrol ☐ Other	**Conditions**	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
	Leaks/Cracks (pumps, gaskets valves, flanges, seams, welds)	☐	☐	☐	
	Damage/deterioration/corrosion	☐	☐	☐	
	Signage correct and visible	☐	☐	☐	
	Supports (Damage, deterioration)	☐	☐	☐	
	Foundation (Cracking, Spalling, settlement, pitting)	☐	☐	☐	
	Interstitial Space pressure correct and free of liquid	☐	☐	☐	
Containment Area	**Description:**				

Conditions	Yes	No	N/A	Repairs / Corrective Actions Required
Leaking/cracks/damage/deterioration or erosion	☐	☐	☐	
Sealed /Plugged Drain Valve	☐	☐	☐	
Water/Spilled liquid/surface sheen presence or discharging	☐	☐	☐	
Other	☐	☐	☐	
Aboveground Piping, Hoses, Valves, Joints, Load Lines, Drip Pans, Pipe Supports (Fluid Transfer)				
Conditions	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
Leaking, cracks, damage or deterioration	☐	☐	☐	
Load line clean/spill free	☐	☐	☐	
Buried lines with exposed area:	☐	☐	☐	
Other	☐	☐	☐	

Tank ID #	**Capacity / Volume:**				**Tank Liquid Level:** *e.g. 2/3 full*	
☐ Lube ☐ Used - Oil ☐ Production Oil ☐ Diesel ☐ Gasoline ☐ Waste ☐ Oily - Water ☐ Brine ☐ Methanol ☐ Inhibitor ☐ Condensate ☐ Ambitrol ☐ Other	**Conditions**	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**	
	Leaks/Cracks (pumps, gaskets valves, flanges, seams, welds)	☐	☐	☐		
	Damage/deterioration/corrosion	☐	☐	☐		
	Signage correct and visible	☐	☐	☐		
	Supports (Damage, deterioration)	☐	☐	☐		
	Foundation (Cracking, Spalling, settlement, pitting)	☐	☐	☐		
	Interstitial Space pressure correct and free of liquid	☐	☐	☐		

Containment Area	**Description:**			
Conditions	**Yes**	**No**	**N/A**	**Repairs / Corrective Actions Required**
Leaking/cracks/damage/deterioration or erosion	☐	☐	☐	
Sealed /Plugged Drain Valve	☐	☐	☐	
Water/Spilled liquid/surface sheen presence or discharging	☐	☐	☐	
Other	☐	☐	☐	
Aboveground Piping, Hoses, Valves, Joints, Load Lines, Drip Pans, Pipe Supports (Fluid Transfer)				
Conditions	**Yes**	**No**	**n/a**	**Repairs / Corrective Actions Required**
Leaking, cracks, damage or deterioration	☐	☐	☐	
Buried lines with exposed area:	☐	☐	☐	
Load line clean/spill free	☐	☐	☐	
Other	☐	☐	☐	

Storage Drums and Bungs ☐ **Drum Storage Area** ☐ **Drums in Waste Storage Building/Area** ☐
Product Drums Storage Building/ Area ☐

Conditions	Yes	No	N/A	Repairs / Corrective Actions Required
Leaking, cracks, damage or deterioration	☐	☐	☐	
Storage area access unrestricted	☐	☐	☐	
Foundation or supports	☐	☐	☐	
Sealed/plugged drain valve	☐	☐	☐	
Does storage have secondary containment	☐	☐	☐	
Other	☐	☐	☐	

Storage Drums and Bungs ☐ **Drum Storage Area** ☐ **Drums in Waste Storage Building/Area** ☐
Product Drums Storage Building/ Area ☐

Conditions	Yes	No	N/A	Repairs / Corrective Actions Required
Leaking, cracks, damage or deterioration	☐	☐	☐	
Storage area access unrestricted	☐	☐	☐	
Foundation or supports	☐	☐	☐	
Sealed/plugged drain valve	☐	☐	☐	
Does storage have secondary containment	☐	☐	☐	
Other	☐	☐	☐	

Site Specific Instruction Requirements (not listed above)

Instructions:

3. This form is to be completed for each inspection conducted.
4. Save this form using the following naming convention: '**Visual Waste Storage Inspection and Inventory Record <yyyy-mm-dd>.doc**' (e.g. 'Visual Waste Storage Inspection and Inventory Record 2004-08-19.doc'). .
5. If there is an on-site requirement for the hard-copy documentation, please refer to the appropriate file requirements for filing responsibilities and documentation.

SECTION A - FACILITY AND INSPECTOR INFORMATION		
Facility Name:	**Facility #** (if applicable):	
Employee Name:	**Employee ID:**	**Date:**

SECTION B - INSPECTION CHECKLIST

WASTE STORAGE AREA CHECKLIST				CONTAINER STORAGE CHECKLIST			
No	Yes	N/A		No	Yes	N/A	
☐	☐	☐	1. Does all liquid waste have secondary containment and weather protection? (e.g. overpack, drip tray, drip pan, door thresholds, etc.)	☐	☐	☐	11. Is waste stored in suitable containers with the bungs or lids secured?
☐	☐	☐	2 Is the secondary containment free of liquids?	☐	☐	☐	12. Are containers in good condition, not rusted and with no bulging or leaking?
☐	☐	☐	3. Is the signage correct and visible?	☐	☐	☐	13. Is each container correctly labelled with any old labels removed or painted out?
☐	☐	☐	4. Is access to waste storage area unrestricted?	☐	☐	☐	14. Are the containers stored in the correct location with weather protection and secondary containment?
☐	☐	☐	5. Is there fire protection equip-ment in waste storage building?	☐	☐	☐	15. Containers not stacked more than 2 high & is there adequate Aisle space?
☐	☐	☐	6. Are tank unloading areas clean and free from spilled materials?	☐	☐	☐	16. Are empty containers stored with bungs and lids on tight?
☐	☐	☐	7. Are liquid levels low enough to prevent overfilling?	☐	☐	☐	17. Is this area around the empty containers clean & free from spills?
☐	☐	☐	8 Are Above Ground Storage Tanks the associated piping & connections in good condition & not showing signs of corrosion or leakage?	☐	☐	☐	18. Is spill response equipment present & in working order?
☐	☐	☐	9. Do pressure gauge readings indi-cate that there are no leaks in double-walled tanks?	☐	☐	☐	19. Provide explanation in comments.
☐	☐	☐	10. Does each tank have correct signage?	☐	☐	☐	20. Provide explanation in comments.

SECTION C - OBSERVATIONS AND CORRECTIVE ACTION REQUIRED			
Item #	**Observation**	**Corrective Action Required**	**Date Action Taken**

PROCEDURE FOR WASTE STORAGE INSPECTION

1. Conduct visual inspection **bi-weekly for compressor facility if designated CESQG (Conditionally Exempt Small Quantity Generator). State of Washington SQG is equivalent to CESQG.**
2. Conduct visual inspection **quarterly for meter facility if designated CESQG (Conditionally Exempt Small Quantity Generator). State of Washington SQG is equivalent to CESQG.**
3. Conduct visual inspection **weekly for all facilities designated SQG (Small Quantity Generator) or LQG (Large Quantity Generator). State of Washington MQG is equivalent to SQG.**
4. Conduct inspection following the checklist in **Section B**. If the item does not apply at that facility, write N/A in the boxes.
5. Answer “yes” or “no” to any items inspected on the checklist by placing a tick in the appropriate box.
6. If you answer “no” to any items, complete **Section C.**
7. File the completed record at the facility or area office for at least two years.

APPENDIX C

EMPLOYEE TRAINING RECORDS

RECORD OF DISCHARGE PREVENTION BRIEFINGS

Instruction: Briefings will be scheduled and conducted by the owner or operators for operating personnel at intervals frequent enough to assure adequate understanding of the SPCC Plan for this facility. These briefings should also highlight and describe known discharge events or failures, malfunctioning components, and recently developed precautionary measures. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharges of oil and applicable pollution control laws, rules and regulations. During these briefings there will be an opportunity for facility operators and other personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the facility.

Date: _____

Attendees: _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

Subject and Issues: _____

_____

_____

Recommendations and suggestions: _____

_____

APPENDIX D

SPCC PLAN ADDENDUM

1044 North 115th Street, Suite 400
Omaha, Nebraska 68154-4446
USA

Telephone: 402.691.9500
Fax: 702.691.9526
Email: Power@Tenaska.com
Website: www.Tenaska.com

Spill Prevention Control and Countermeasures Plan (SPCC)

Prepared for

TENASKA WESTMORELAND GENERATING STATION

Smithton Pike
South Huntingdon Township,
Westmoreland County
April 2013

1.0 SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN CERTIFICATION – 40 CFR 112.3 (D)

Not Applicable at this time as petroleum is not anticipated in significant quantities as of December 2012. If the aboveground oil storage capacity at the Facility exceeds 10,000 gallons, the SPCC Plan must be certified by a professional engineer, per 40 CFR 112.3(g)(2) and 112.5(c).

CERTIFICATION:

In accordance with 40 CFR 112.3(d), I hereby certify that:

1. I am familiar with the requirements of the SPCC rule;
2. ☐ I have or ☐ my agent _____ has visited and examined the facility;
3. This Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule;
4. Procedures for inspections and testing have been established;
5. There are no required exceptions for purposes of impracticability related to containment and/or diversionary structures that would necessitate explanation and/or alternative measures such as those listed under 40 CFR 112.7 (a)(d)(1) and (2); and,
6. The Plan is adequate for the facility.

Note that this P.E. certification does not relieve the owner or operator of an onshore facility of his duty to prepare and fully implement this Plan in accordance with all applicable requirements of 40 CFR Part 112.

Date: _____ Signed: _____

_____ P.E.
Licensed Professional Engineer
State of Pennsylvania No.

STAMP

ACRONYMS

AST	Above-ground Storage Tank
CFR	Code of Federal Regulations
LEPC	Clark County Local Emergency Planning Committee
MSDS	Material Safety Data Sheet
NDEP	Nevada Department Environmental Protection
NRC	National Response Center
NRS	Nevada Revised Statute
OWS	Oil Water Separator
RQ	Reportable Quantity
SERC	State Emergency Response Commission
SPCC	Spill Prevention Control & Countermeasures
UST	Underground Storage Tanks

2.0 APPLICABILITY - 40 CFR 112.1

Spill Prevention, Control, and Countermeasure (SPCC) Plans for facilities are prepared and implemented as required by United States Environmental Protection Agency (USEPA) regulations contained in Title 40, Code of Federal Regulations, Part 112 (40 CFR 112). The purpose of the SPCC Plan is to establish a comparable Federal/State spill prevention program that minimizes the potential for discharges. A non-transportation related facility is subject to the SPCC regulations if: the aboveground storage capacity of the facility exceeds 1,320 gallons; or the underground storage capacity exceeds 42,000 gallons; and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters of the United States. Only containers with a storage capacity of 55 gallons or greater are included in the calculation of aboveground storage capacity.

The SPCC Plan is not required to be filed with USEPA, but a copy must be available for on-site review by the Regional Administrator during normal working hours. **A copy of this Plan is maintained in the Facility Control Room. The SPCC Plan must be submitted to the USEPA Regional Administrator and the applicable state agency, along with other information specified in §112.4 if <u>either</u> of the following occurs:**

1. The facility discharged more than 1,000 US gallons of oil in a single discharge into or upon the navigable waters of the United States or adjoining shorelines in a single event; or
2. The facility discharged more than 42 US gallons of oil in each of two (2) discharges within any twelve (12) month period.

The below listed information must be submitted to the USEPA Regional Administrator within sixty (60) days if either of the above thresholds are reached. The report must contain the following information:

1. Name of the facility;
2. Name(s) of the owner and/or operator of the facility;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures taken, including description of equipment repairs and/or replacements;
6. A description of the facility, including site and topographic maps, flow diagrams;
7. The cause(s) of discharge(s), including a failure analysis of system or subsystem in which failure occurred;
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence;
9. Other information the Regional Administrator may reasonably require pertinent to the Plan or discharge.

The SPCC Plan shall be amended within six (6) months when there is a change in facility design, construction, operation, or maintenance that materially affects the potential for a discharge. The Plan must be reviewed at least once every five (5) years and amended to include more effective prevention and control technology, if such technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge. A registered professional engineer must certify all technical changes.

Owners and operators failing or refusing to comply with the SPCC regulations shall be subject to a Class I civil penalty in an amount up to $25,000 for a violation or a Class II civil penalty in an amount up to $125,000 for a violation. This language tracks the language in Section 311(b)(6)(B) of the Clean Water Act, 33 U. S. C. §1321(b)(6)(B).

If the owner and/or operator of a facility is required to prepare an SPCC Plan but is not required to submit a Facility Response Plan, the SPCC Plan should include a signed certification form, ***Certification of the Applicability of the Substantial Harm Criteria***, which is described in Appendix C to Part 112 and completed in Attachment D-2 of this Plan.

3.0 RECORD OF AMENDMENTS AND PLAN REVIEW – 40 CFR 112.5(a), (b) & (c)

40 CFR 112.5(a), (b) and (c) requires the SPCC Plan to be amended whenever there is a change in facility design, construction, operation, or maintenance, which materially affects its potential to discharge to navigable waters of the United States or adjoining shorelines. In addition, the owner or operator must complete a review and evaluation of the SPCC Plan at least once every five (5) years. Amendments to the Plan shall be made within six (6) months of the change or review, with technical amendments certified by a Professional Engineer (PE). Administrative updates such as name or phone number changes do not require PE certification.

Table 1
Plan Review Log
Westmoreland Generating Station

Date	Amendment/Review Description	P.E. Certification Required	Name of P.E.	Signature	P. E. Registration	
					State	Number
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				
		☐Yes ☐No				

Note:
The owner or operator must complete a review and evaluation of the SPCC Plan at least once every five (5) years. The Plan must be amended within six (6) months of the review to include more effective control and prevention technology, if such technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge.

4.0 PLAN CONFORMANCE – CFR 112.7 (a)(1) & 2

This Plan was prepared in general conformance with the standards prescribed under 40 CFR 112. Where there is deviation from applicable parts of this regulation, with the exception of the secondary containment requirements under 40 CFR §112.7 (c) and (h)(1), equivalent environmental protection by other means of prevention, control or countermeasure is provided.

The SPCC regulation at 40 CFR Part 112 satisfies associated requirements administered by the State of Nevada for this type of facility. This SPCC Plan was written to comply with requirements of 40 CFR Part 112 and thereby complies with the general requirements for the State of Pennsylvania. Discharge notifications will be made in compliance with local, state, and federal requirements.

4.1 Deviations

40 CFR 112.7(a)(2): This SPCC addresses the requirements of 40 CFR Part 112. Acknowledged or intended deviations are not anticipated given the current facility design criteria.

4.1.1 Integrity Testing for Tanks Subject to 40 CFR 112.8(c)(6)

Addressed, in part, in subsection 4.2 of the PPC Plan

Bulk storage tanks designed for Facility use which are subject to 40 CFR 112.8 are identified in Table D-3. Tanks that are subject to 112.8(c)(6) are required to undergo integrity testing on a regular schedule and whenever material repairs are made along with frequent visual inspections. The regulations at 40 CFR 112.7(a)(2) allow Environmentally equivalent practices to be implemented in place of integrity testing where equivalent environmental protection is achieved. Environmentally equivalent measures to integrity testing result in the reduced risk of container failure and the timely detection of leaks before they become significant.

All Facility containers subject to 40 CFR 112.8(c)(6) are shop built containers with shell capacities of less than 30,000 gallons. Environmentally equivalent measures to integrity testing will be applied to all Facility tanks subject to 40 CFR 112.8(c)(6). The tank size and secondary containment type and capacity for applicable tanks at the Facility will be taken into consideration when developing environmentally equivalent measures. The measures selected for environmental equivalence to integrity testing will consist of elevating bulk storage tanks and/or installing synthetic liners below bulk storage tanks.

The elevation of bulk storage tanks is considered environmentally equivalent to integrity testing as long as frequent visual inspections are conducted on the tanks. The elevated tanks must have the bottom of the tank elevated sufficiently to prevent direct contact with the soil in order to reduce the corrosion potential and to facilitate visual inspection of the bottom of the tanks. Elevated tanks allow inspectors to quickly and easily identify leaks or leak potential areas in a timely fashion. All Facility tanks will be informally inspected during regular operations, and written formal inspections will be conducted according to schedule. Facility inspection procedures are outlined in subsection 4.8.

Liners or barriers between the storage tank and the ground can be used as environmentally equivalent to integrity testing as long as frequent visual inspections are conducted. The liners

or barriers must be designed to be impervious to oil and operated so that leaks are immediately detected. The liners or barriers will be frequently inspected for condition and integrity.

Facility tanks will be informally inspected during regular operations, and written formal inspections will be conducted as scheduled. Facility inspection procedures are outlined in subsection 4.2 of the PPC Plan.

5.0 SPILL EXPERIENCE – 40 CFR 112.7(a)

The Facility is in design and construction. Commercial operation is anticipated to commence on or about May 2017. Reportable spills have not occurred at this Facility.

6.0 MANAGEMENT APPROVAL AND RESPONSIBILITY – 40 CFR 112.7

In accordance with 40 CFR 112, responsibility for oil spill control at the Westmoreland Generating Station is assigned to the Facility Manager. Facility management is committed to providing the manpower, equipment, facilities and materials required to expeditiously control and remove any harmful quantity of oil discharged from this facility (40 CFR 112.7(d)(1)).

By signature, I certify that I have reviewed and approved this SPCC Plan.

Signed: _____ Date: _____

Todd S. Jonas
Senior Vice President

Next Review and Evaluation is due: April 2018 (CFR 40 112.5(b))

7.0 CROSS REFERENCE – 40 CFR 112.7

Table 2

Regulatory Cross-Reference Table

Westmoreland Generating Station

Topic	40 CFR Section Number	Section or Page Number in This Plan
General Applicability.	112.1	Applicable. Greater than 1,320 gallons of aboveground oil storage capacity.
Definitions.	112.2	Applicable. Appendix D, Section 2.0. .
Requirement to prepare and implement a Spill Prevention, Control, and Countermeasure Plan.	112.3 (a)	Applicable. Plan currently implemented.
Requirement to prepare and implement a Spill Prevention, Control, and Countermeasure Plan.	112.3 (b) and 112.3 (c)	Applicable.
Licensed Professional Engineer review and certification.	112.3 (d)(1) and (2)	Applicable. PPC Plan subsection 1.1 Appendix D, Section 1.0
Availability of the Plan.	112.3 (e)(1) and (2)	Applicable. Appendix D, Section 1.0. A copy of the Plan is available at the facility and is available for review by the Regional Administrator during normal working hours.
Extension of time.	112.3 (f)	Not applicable. Additional time to complete this Plan prior to operations is not requested.
Qualified Facilities.	112.3 (g)	Not applicable at this time. The Facility is not assuming eligibility to self-certify the Plan because the aggregate oil storage volume may exceed the threshold volume of 10,000 gallons. The Facility has not had a discharge of oil.
Amendment of Spill Prevention, Control, and Countermeasure Plan by Regional Administrator.	112.4 (a) through (f)	Not applicable. An uncontrolled discharge of oil has not occurred at the Facility,
Amendment of Spill Prevention, Control, and Countermeasure Plan by Owner or Operator.	112.5 (a) and (b)	Appendix D, Section 3.0, Table 1 (Plan Review Log).
Amendment of Spill Prevention, Control, and Countermeasure Plan by Owner or Operator – Professional Engineer Certification	112.5 (c)	Appendix D, Section 1.0 Plan Certification and Section 3.0, Table 1 (Plan Review Log).
Qualified Facilities Plan Requirements	112.6	Not assumed to be applicable. Facility assessment under Tier I or Tier II Qualified Facility thresholds pending.
Facility conformance to the requirements listed in 40 CFR 112.	112.7 (a)(1)	Appendix D, Section 4.0

Table 2

Regulatory Cross-Reference Table

Westmoreland Generating Station

Topic	40 CFR Section Number	Section or Page Number in This Plan
Deviations from specified requirements of Part 112.7, 112.8, and 112.9.	112.7 (a)(2)	PPC Plan subsection 4.2 Appendix D, subsection 4.1
Facility layout and diagram.	112.7 (a)(3)	Appendix D, Section 10.0 and Figures (pending)
Type of oil in each fixed container and associated storage capacity.	112.7 (a)(3)(i)	Appendix D, subsection 10.1.2, Table 3.
Discharge prevention measures.	112.7 (a)(3)(ii)	PPC Plan Section 4.0 and Appendix D, subsection 11.0
Discharge or drainage controls.	112.7 (a)(3)(iii)	PPC Plan Section 4.0 and subsection 4.1; Appendix D Section 23.0 – 23.2)
Countermeasures for discharge discovery, response, and cleanup.	112.7 (a)(3)(iv)	PPC Plan Section 5.0 Appendix D, Section 12.0
Methods of disposal of recovered materials	112.7 (a)(3)(v)	Appendix D, subsection 13.5
Contact list for key personnel, responders, and regulatory notifications.	112.7 (a)(3)(vi)	PPC Plan Emergency Response Information PPC Plan Section 6.0 Appendix D, Section 11.0
Report procedures and material content.	112.7 (a)(4)	PPC Plan Section 3.0 Appendix D, Section 11.0
Readily referenced and usable response procedures.	112.7 (a)(5)	PPC Plan Emergency Response Information PPC Plan Section 5.0 Appendix D, Section 12.0
Failure release predictions.	112.7 (b)	Appendix D, Section 13.0
Discharge containment.	112.7 (c)	PPC Plan Section 4.1 Appendix D, subsection 10.1.2 Appendix D, Attachment D-1
Professional Engineer certification, impracticability exception explanation(s), if applicable.	112.7 (d)	PPC Plan subsection 1.1 Appendix D, Section 1.0
Inspections, tests, and records.	112.7 (e)	PPC Plan subsection 4.3 Appendix D, Section 16.0 Appendix D, Attachment D-2
Personnel training.	112.7 (f)	PPC Plan subsection 4.8 Appendix D, Section 17.0

Table 2

Regulatory Cross-Reference Table

Westmoreland Generating Station

Topic	40 CFR Section Number	Section or Page Number in This Plan
Security.	112.7 (g)	PPC Plan subsection 4.6 Appendix D, Section 18.0
Loading and unloading of oil from tank trucks.	112.7 (h)	Appendix D, Section 19.0
Evaluation of field-constructed aboveground containers.	112.7 (i)	Appendix D, Section 20.0
Complete discussion of conformance with the applicable guidelines for spill prevention and containment procedures.	112.7 (j)	PPC Plan Sections 4.0 and 5.0 Appendix D, Section 4.0
Qualified oil-filled operational equipment.	112.7 (k)	Not applicable; Appendix D, Section 22.0
Obligation to meet the general requirements of 40 CFR 112.7 and discharge prevention and containment procedures of 40 CFR 112.8.	112.8 (a)	Integrated PPC/SPCC Plan
Facility drainage.	112.8 (b)	Appendix D, Section 23.0
Bulk storage containers.	112.8 (c)	Appendix D, Section 24.0
Facility transfer operations, pumping, and facility process.	112.8 (d)	Appendix D, Section 25.0
Spill Prevention, Control, and Countermeasure Plan requirements for onshore oil production facilities.	112.9	Not applicable.
Spill Prevention, Control, and Countermeasure Plan requirements for onshore oil drilling and workover facilities.	112.10	Not applicable.
Spill Prevention, Control, and Countermeasure Plan requirements for offshore oil drilling, production, or workover facilities.	112.11	Not applicable.
Subpart C – Requirements for Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and for Vegetable Oils, including Oils from Seeds, Nuts, Fruits, and Kernels.	112.12	Not applicable
Response Requirements; Facility Response Plan (Substantial Harm Criteria)	112.20 and Appendix C to Subpart D	Appendix D, Attachment D-2, not-applicable.

8.0 DEFINITIONS

Discharge – Includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping into air, water or on the land.

Discharge of Oil in Such Quantities as "may be harmful" – (40 CFR Parts 110 and 112) A release of oil onto any surface or upon water (including sewers and other conveyances) in such quantities deemed harmful to public health or welfare, including releases that:

(a) violate applicable water quality standards; or,
(b) cause a film, sheen upon, or discoloration of the water surface or adjoining shorelines, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or,
(c) discharge more than 1,000 U.S. gallons of oil in a single event into or upon navigable waters of the U.S. or adjoining shorelines (40 CFR part 112.4); or,
(d) discharge more than 42 U.S. gallons of oil in each of two (2) discharges within any 12-month period (40 CFR Part 112.4).

Incidental Spill – A release of a small quantity of oil or a hazardous chemical that does not pose an immediate or long-term safety or health hazard such as fire, explosion, or chemical exposure, and which can be absorbed, neutralized, or otherwise controlled at the time of the release by employees in the immediate spill area without the need of coordinated spill response from throughout the work place by Company employees or by outside contractors.

Navigable Waters – All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tide; interstate waters, wetlands and their tributaries; intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands and their tributaries; as well as waters which are or could be used by interstate or foreign travelers for recreational or other purposes; or from which fish or shellfish are or could be taken and sold in interstate or foreign commerce.

Non-Incidental Spill – A non-incidental spill is a release of a quantity of oil or a hazardous substance that poses an immediate or long-term human health or environmental hazard. A non-incidental spill requires response by trained outside emergency responders or an outside contractor for containment/cleanup as determined by the Emergency Coordinator and Environmental Services.

Oil – Oil of any kind or in any form, including but not limited to petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil (40 CFR Part 112).

Sheen – An iridescent appearance on the surface of the water. (NOTE: As little as a teaspoonful of oil can cause a sheen and could technically be reportable to the National Response Center. Facility management will determine the need to report for each spill incident).

Spill Event – A discharge of oil into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

Storage Capacity – Includes all oil storage facilities, oil-filled equipment, and oil-filled containers.

9.0 DISCUSSION OF FACILITIES NOT YET FULLY FUNCTIONAL – 40 CFR 112.7

The Tenaska Westmoreland Generating Station (Facility) is planned to be developed on Smithton Pike in South Huntingdon Township, Westmoreland County at approximate coordinates of

40.180117º North latitude and -79.709319 West longitude. The Facility design integrates secondary containment around oil storage units and oil-filled operational equipment. Commercial operation is scheduled to commence in approximately May 2017. Power production processes are not designed to use petroleum fuel for commercial generation of electricity. Diesel-fueled back-up generators, however, will be available on-site for emergency uses.

40 CFR 112.7(a)(1): This Spill Prevention Control and Countermeasure (SPCC) Plan satisfies requirements for Oil Pollution Prevention as specified under 40 CFR Part 112. This Plan follows the sequence outlined in 40 CFR Part 112.7 and will be designed, and modified as necessary, to support and coordinate with a wastewater discharge permit expected to be applied for and obtained from the State of Pennsylvania Department of Environmental Protection (DEP). Table 2, included in Section 7.0, cross-references sections of this integrated PPC and SPCC Plan (Plan) with applicable regulatory requirements.

Based on the applicability review for the *Certification of the Applicability of the Substantial Harm Criteria*, as currently projected based on Facility design, a Facility Response Plan is not required for the Westmoreland Generating Station. The completed *Certification of the Applicability of the Substantial Harm Criteria* is found in Attachment D-2.

The Facility Manager or designated representative will review and update the plan every five (5) years or when:

- Changes are made to applicable regulations.
- The plan fails in an emergency.
- The facility changes in a way that increases the potential for emergencies involving hazardous materials.
- There is a change in the facility design, construction, operation, or maintenance.
- The list of emergency phone numbers, contacts, or responsible parties change.

If an amendment to the SPCC plan is required, such changes shall be made within six (6) months. A review checklist to be used for the five-year plan review is found in Attachment D-3. Administrative changes to the SPCC plan, such as designated contacts, phone numbers, and responsible parties, do not require certification by a Professional Engineer. Technical amendments to the SPCC plan such as the addition of a new tank require certification by a Professional Engineer.

40 CFR 112.7(f)(2): The Facility Manager is the designated person “accountable for discharge prevention and who reports to [or is] facility management.”

10.0 FACILITY INFORMATION

FACILITY ADDRESS:	Westmoreland Generating Station Smithton Pike South Huntingdon Township, Westmoreland County, Pennsylvania 40.180117º North latitude -79.709319 West longitude 1,230 feet above mean sea level (approximate center of the power block)
TYPE OF FACILITY:	Westmoreland Generating Station is a peaking facility that consists of two adjoining facilities with (5) natural gas fired combustion turbines and (3) steam turbines for a total generating capacity of 280 megawatts (MW). The facility is located on the west side of Smithton Pike, across from an agricultural farm and is largely surrounded by open, sparsely developed property used for farming, agriculture, or pasture.
FACILITY OWNER:	Tenaska Pennsylvania Partners, LLC 1044 North 115th Street, Suite 400 Omaha, Nebraska 68154
PERSON RESPONSIBLE FOR SPILL PREVENTION:	To Be Determined Facility Manager
STANDARD INDUSTRIAL CLASSIFICATION:	4911
HOURS OF OPERATION:	24 hours/day, 7 days/week
LOCATION OF SPCC PLANS:	In conjunction with PPC plan, one copy is kept at the control room building.

10.1 Facility Description and Engineered Controls – 40 CFR 112.7(a)(3) and (a)(5)

Westmoreland Generating Station handles and stores petroleum products to lubricate and maintain combustion turbines, steam turbines, and generators. Other non-petroleum chemicals are used for emissions control equipment and to condition process water. Petroleum storage or accumulation areas are or will be designed/designated at a location proximal to the intended place of use. The following sections describe the facility layout, container inventories, and discharge prevention measures (40 CFR 112.7(a)(3)); as well as, spill prediction and secondary containment controls (40 CFR 112.7(a)(5)).

10.1.1 Facility Layout – 40 CFR 112.7(a)(3)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation. A Facility map will be included to identify the locations of petroleum product storage or use.

10.1.2 Stationary Oil Storage Inventory and Control Specifications

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

Oil-filled equipment at the Facility will be subject to the requirements of 40 CFR 112.7. All oil-filled equipment at the Facility will be placed within bermed/diked areas in lieu of implementing the alternative requirements to general secondary containment allowed by 40 CFR 112.7(k). Oil-filled equipment at the Facility will be listed in the Material and Waste Inventory included in subsection 2.3 of the PPC Plan.

The inventory of oil storage containers and oil-filled equipment subject to regulation under 40 CFR Part 112 pertaining to Oil Pollution Prevention is listed in the following Table 3. Information summarized in Table 3 also includes material specifications, secondary containment volumes, and spill prediction data relevant to each oil storage container or piece of oil-filled equipment listed.

Site-specific spill scenarios describe instances where there is a potential for petroleum spills to leave the site or enter waterways, for which there are associated engineering controls. Note that maximum volumes and flow rates are based on only one tank rupturing and draining in one hour, and that if a secondary containment system fails, spilled fluid will travel south within the site.

Table 3
Oil Storage Inventory & Engineered Controls
Westmoreland Generating Station

Source	Maximum Volume (Gal)[1]	Material Stored	Temperature Above Ambient?	Tank Material	Secondary Containment Volume (Gallons)	Type of Secondary Containment	Type of Failure	Maximum Flow (Gal/Min)[1]	Direction of Flow From Site[2]
Primary Location (TBD)									
Primary Location (TBD)									

Table 3 Continued
Oil Storage Inventory & Engineered Controls
Westmoreland Generating Station

Source	Maximum Volume (Gal)[1]	Material Stored	Temperature Above Ambient?	Tank Material	Secondary Containment Volume (Gallons)	Type of Secondary Containment	Type of Failure	Maximum Flow (Gal/Min)[1]	Direction of Flow From Site[2]

Table 3 Continued

Oil Storage Inventory & Engineered Controls

Westmoreland Generating Station

Source	Maximum Volume (Gal)[1]	Material Stored	Temperature Above Ambient?	Tank Material	Secondary Containment Volume (Gallons)	Type of Secondary Containment	Type of Failure	Maximum Flow (Gal/Min)[1]	Direction of Flow From Site[2]
Common Tanks									

Notes:
(1) Maximum volumes and flow rates are based on only one tank rupturing and draining in one hour.
(2) In the event that a secondary containment system fails, any spill will travel south within the site.

Note the following clarifications:

1. Oil storage tanks are constructed to be compatible with the material stored within them.
2. Oil storage tanks and transformers are filled manually under constant visual observation to avoid overfilling and spilling.
3. Oil storage tanks and transformers are equipped with a site glass or a site gauge to avoid overfilling and spilling.
4. Facility personnel conduct passive inspection as a function of regular operations and concurrently visually inspect tanks and piping for leaks, levels and damage. Walk-though inspections are informal; however, leaks or defects are promptly reported to the Facility Manager and corrected.
5. Aboveground storage tanks used at the Facility are externally examined at a regular frequency. Inspections are designed to identify signs of deterioration and detect leaks or accumulation of oil within containment areas. Each inspection includes a visual examination of seams, rivets, bolts, gaskets, nozzle connections, valves and pipelines directly connected to the tank, and condition of the foundation and supports. Visible oil leaks from tank seams, gaskets, rivets and bolts are promptly corrected. Inspection checklists are found in Attachment B.
6. Bulk oil storage container integrity testing requirements in accordance with 40 CFR 112.8(c)(6) will be observed. Containment and construction integrity testing for bulk oil storage tanks will be assessed by visual inspection conducted by on-site personnel appropriately trained to implement SPCC requirements per 40 CFR 112.7(f). Nominal tank sizes combined with engineered measures to fully control and contain a potential release are deemed sufficient to justify monthly, exterior visual inspections as the only routine inspections prescribed for these tanks.
7. If a field-constructed aboveground container undergoes a repair, alteration, reconstruction or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture or other catastrophe, the container will be evaluated for the risk of discharge or failure due to brittle fracture or catastrophe and appropriate action will be taken, as necessary.

10.1.3 Oil Storage Areas - Mobile or Portable Containers

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

In accordance with 40 CFR 112.7(a)(3), the owner or operator of a facility may list the contents and capacity of portable or mobile oil storage containers (greater than or equal to 55-gallon capacity) staged in *storage areas* in the content of the SPCC Plan. If the total number of mobile or portable containers changes, the Plan need only estimate the number of mobile or portable containers maintained at the facility. The following inventory estimates the total number of portable or mobile oil storage containers and the cumulative volume of material maintained at the Facility. The location of mobile or portable oil storage containers is to be designated on Figure 2.

Table 4
Oil Storage Inventory – Portable or Mobile Containers
Westmoreland Generating Station

Material Stored	Location (Figure Reference)	Estimated Number of Containers	Estimated Cumulative Volume (gallons)	Is Temperature Above Ambient?
Primary Location (TBD)				
Primary Location (TBD)				

11.0 DISCHARGE REPORTING PROCEDURES – 40 CFR 112.7 (a)(4)

Addressed in Emergency Response Procedures detailed at the beginning of the PPC Plan.

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

The following reporting procedures should be immediately implemented after an oil/fuel discharge (of any size) has occurred.

1. Immediately contact the Facility Manager to report the discharge:

   Facility Manager: **TBD**

Office Phone Number:	**TBD**
Fax Number	**TBD**
Mobile Phone Number:	**TBD**

2. Based on the size, nature and circumstances of the discharge, the Facility Manager will notify the appropriate regulatory authorities. Federal SPCC regulations require that any discharge with the potential of reaching a navigable waterway in harmful quantities, as defined in 40 CFR 110.3, be immediately reported to the National Response Center (NRC). Any discharge greater than 42 US gallons must be immediately reported to the NRC.

National Response Center: (800) 424-8802
USEPA Region 9: (800) 300-2193

3. When contacting the above agencies, have the following information readily available:

- Date, time, location, and source of discharge:_____
- Type and quantity of material discharged:_____
- Cause and circumstances of discharge:_____
- Hazards associated with the discharge:_____
- Personal injuries, if any:_____
- Corrective action taken or planned to be taken:_____
- Name and number of individual reporting discharge:_____
- Any additional pertinent information:_____

4. If a discharge is too large for Facility personnel to contain or control, or the release occurred within a secondary containment structure, the following entity provides emergency response services for the Facility:

Company:	McCutcheon Enterprises, Inc.
Address:	250 Park Road, Apollo, Pennsylvania
Telephone Number:	724-568-3623

5. In the event of a spill related to the failure or explosion of a transformer, spill response procedures described in the following section titled “Discharge Countermeasure Procedures” will be followed. If a spill reaches waters of the state, the Facility Manager will notify the state emergency response center as required by 40 CFR 210.

12.0 DISCHARGE COUNTERMEASURES PROCEDURES – 40 CFR 112.7(a)(5)

Addressed in subsection 5.0 of the PPC Plan.

1. In the event of a discharge, appropriate actions shall be taken to contain the discharge using all available means including absorbent and/or adsorbent materials and readily available mobile equipment. Absorbent and/or adsorbent materials are kept in a readily available location. In the event of an uncontained discharge, available facility equipment shall immediately construct a containment berm down gradient from the discharge and

absorb and/or adsorb the discharged material with pads, booms, sand, screenings, and/or other available fine-grained materials on hand. Oil-containing material will be properly contained and disposed of in accordance with applicable local, state, and federal environmental regulations.

2. After containing a discharge, all media (soil, water, etc.) mixed with oil will be collected and contained to minimize the spread or dispersion of oil. Examples of proper materials to use for cleanup include adsorbents and/or absorbents such as: aggregate fines, sand, absorbent pads, booms, socks, etc. Proper cleanup will be deemed complete when all applicable local, state, and federal response requirements are satisfied. Facility personnel will determine and direct cleanup levels.
3. Materials that have contacted discharged fluids shall be placed in a temporary staging area until proper methods of disposal are determined. Impacted media may be sampled prior to determining a proper method of disposal. Determining a proper method of disposal will take into consideration local, state, and federal environmental regulatory requirements. Facility personnel determine proper and appropriate disposal methods.
4. In the event of a leak from a tank or piping, as much of the discharge as possible will be collected manually and stored in an appropriate container pending proper disposal or reuse. Immediate action shall be taken to stop or minimize the leak rate. Remaining product in the containment area shall be cleaned up and properly disposed.
5. In the event of a tank, hose, or piping failure, arrangements shall be made to empty the tank to a safe level by immediately filling all mobile equipment on the job. Products remaining in the containment area shall be handled as described in Item 4.
6. In the event of a fire, the local fire authority will be immediately contacted.
7. Liquid products or waste used or generated in the shop shall be properly stored and handled. All product containers shall be sealed when not in use. Damaged containers will be returned to the appropriate vendor.

13.0 POTENTIAL EQUIPMENT FAILURES – 40 CFR 112.7(b)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

Spills or leaks may occur from storage or process tanks, from handling or transferring operations, or during maintenance activities. Areas with a potential for spills or leaksand a summary of the nature of the potential spill or leak and the prevention practices that have been developed to deal with these potentials are described as follows:

13.1 Storm Water Basins

Potential - Spills or leaks from the storm water basins could occur due to berm failure, act of nature, or being struck by mobile equipment.

Gallons potentially spilled:	Maximum 500,000 gallons.
Rate of flow:	1 to several gallons per minute.
Direction:	Any spills or leaks would most likely be filtered by buffers.

Prevention - To detect any potential problems with the outer walls of the basin, regular visual inspections will be conducted.

Containment - The storm water basins will be built of earthen material, below or above grade based on site conditions. There is no secondary containment for the system; however, the system is monitored frequently. Potential spills will be contained within the area.

13.2 Mobile Equipment Fueling

Potential - Spills could result due to rupture of delivery hose or overfilling of the vehicle fuel tanks.

Gallons potentially spilled:	Maximum 50 gallons
Rate of flow:	1 to several gallons per minute.
Direction:	Likely contained in immediate area of spill or leak.

Prevention – TPP employees will be present during fueling operations of mobile equipment to ensure proper procedures are followed and adequate precautions are taken during the fueling operations. The employee will be required to stay with the vehicle during fueling and to monitor the dispensing operation, and to immediately turn off the delivery pump if there is a rupture or leak in the delivery hose.

Containment - Any leaks or spills from the delivery hose will be contained with absorbent material.

13.3 Vehicle Fuel and Hydraulic Tanks

Potential - Spills could result if there is a rupture of the wall of a vehicle fuel tank.

Gallons potentially spilled:	Maximum 100 gallons.
Rate of flow:	1 to several gallons per minute.
Direction:	Likely contained in immediate area of rupture or leak.

Prevention - To detect any potential problems with the outer walls of the tanks, inspection of fuel tanks will be included as part of routine visual inspections conducted on equipment.

Containment - Any leaks or spills from the vehicle fuel tank will be contained with absorbent material or containers, if sufficient space exists to place the containers under the leaking tank.

13.4 Miscellaneous Material Handling Operations

Potential - Spills and leaks of material may also occur throughout the Facility during routine handling and transfer operations.

Gallons potentially spilled:	Maximum 55 gallons.
Rate of flow:	1 to several gallons per minute.
Direction:	Likely contained in immediate area of transfer or storage container.

Prevention - Transfer lines, pumps, drums, and storage containers will be inspected on a regular basis to detect any potential problems. TPP employees will be trained in proper dispensing techniques and procedures for handling chemicals and oils. Transfer lines, pumps, drums, and storage containers will be located away from storm water drainage pathways.

Containment - Spills or leaks from material handling operations will be collected and contained using absorbent pads, oil dry, or by other appropriate means. Spills and leaks as a result of these activities are not likely to be of significant volume or duration and, therefore, should not

impact facility personnel or operations beyond the immediate point of release. Spills and leaks of this nature will generally be limited to 55 gallons.

13.5 Summary of Potential Discharge Scenarios

The following table summarizes potential discharge scenarios:

Containment Unit	Potential Event	Discharge Direction	Volume Released (gallons)	Discharge Rate

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A release due to a failure of an above ground storage tank (AST) will be detected by visual inspection. Most leaks, ruptures, or discharges will be contained within containment structure(s) or the second wall of an AST. Releases occurring outside secondary containment (e.g. from overfilling vehicles, hose ruptures, etc.) will be contained on-site using absorbent/adsorbent materials (pads, booms, drip pans, dirt, sand, etc.) and readily available mobile equipment. Releases occurring outside of secondary containment typically will occur in the presence of personnel that will execute discharge countermeasures as outlined in this Plan.

Various small containers may be located in shop areas. A release inside a Facility building is not likely to result in a localized discharge of more than five gallons.

Disposal of Spill-Related Materials

Residual material that is generated as a result of cleanup actions will be containerized and transferred off-site for disposal.

14.0 CONTAINMENT AND DIVERSIONARY STRUCTURES – 40 CFR 112.7(c)(1)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

15.0 DEMONSTRATION OF IMPRACTICABILITY – 40 CFR 112.7(d)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

16.0 INSPECTIONS, TESTS, AND RECORDS – 40 CFR 112.7(e)

Addressed in subsection 4.3 of the PPC Plan.

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

1. Daily.
2. Monthly.
3. Where applicable.
4. For ASTs that must be integrity tested.

17.0 PERSONNEL TRAINING AND DISCHARGE PREVENTION MEASURES – 40 CFR 112.7(f)

Addressed in section 4.0 and subsection 4.8 of the PPC Plan.

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

The following provisions describe the basic tenets of operation that will be employed to inform and instruct Facility personnel regarding management authority, and the proper and responsible use and management of petroleum products, as well as expectations that :

1. The Facility Manager or his secondary appointee has primary responsibility for oil spill prevention.
2. Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges, discharge procedure protocols, applicable pollution control laws and regulations, general facility operations, and the contents of the facility SPCC Plan.
3. Initial training and subsequent briefings are to be provided by management for all oil-handling personnel to ensure adequate understanding of the components of this SPCC Plan and included requirements. Topics to be discussed, typically during hazard communication ("HAZCOM") training, include discharge prevention and cleanup, inspection of equipment, and AST integrity.

18.0 SECURITY – 40 CFR 112.7(g)

Addressed in subsection 4.6 of the PPC Plan.

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

19.0 TANK TRUCK UNLOADING – 40 CFR 112.7(h)

Tank truck or mobile unit transfer shall be conducted according to the following:

1. Tank truck loading and unloading procedures employed by mobile refuelers and non-transportation-related tank trucks comply with the applicable content and intent of procedures described under 40 CFR 112.7(h)(1) through 40 CFR 112.7(h)(3) and are designed to meet the minimum requirements and regulations established by the U.S. Department of Transportation. Loading and unloading activities are attended by the truck driver and facility personnel, who are trained in emergency procedures, placarding

requirements, and grounding/bonding procedures. Smoking on or around any vehicle while loading or unloading is prohibited.

2. Hand brakes are set and vehicle wheels are chocked prior to material transfer and chocks remain in place until transfer lines are disconnected. The driver must physically connect and disconnect the truck tank with the storage tanks when delivering a product.
3. The liquid level of each bulk storage tank container filled is determined by direct vision gauges.
4. Prior to vehicle departure, drivers are responsible for examining and closely inspecting the lower most drain and all outlets for leaks and, if necessary, fittings are tightened, adjusted or repaired to prevent liquid leaks while in transit. Facility personnel are also on-hand as vehicles depart to monitor for leaks.

20.0 FIELD CONSTRUCTED CONTAINERS – 40 CFR 112.7(i)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

21.0 CONFORMANCE WITH STATE PROGRAM – 40 CFR 112.7(j)

Discharge prevention and containment standards are or will be in conformance with the minimum standards prescribed under 40 CFR 112, which also satisfy applicable State rules, regulations, and guidelines.

22.0 ALTERNATIVE REQUIREMENTS TO GENERAL SECONDARY CONTAINMENT – 40 CFR 112.7(k)(2)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

There are no alternative requirements to general secondary containment currently anticipated in the design of the Facility.

23.0 FACILITY DRAINAGE – 40 CFR 112.8(b)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

23.1 Drainage from secondary containment areas

Storm water drainage or discharge other liquids accumulated within secondary containment structures will be controlled as follows:

- The preferred method of removal of accumulated storm water will be by natural dissipation providing that the accumulation does not damage equipment or structures or inhibit operations conducted within the containment area;
- Storm water that accumulates within a secondary containment area will be inspected prior to drainage;
- If necessary, storm water that accumulates within a secondary containment area that does not dissipate naturally will be removed using a vacuum truck;
- Flapper type drain valves will not be used to drain the secondary containment areas;

- The secondary containment areas will not be equipped with drain valves or pumps; and
- Any hydrocarbon discharges will be removed by vacuum truck or by other appropriate means and properly disposed.

A secondary containment drainage inspection form must be updated each time precipitation is drained or removed from secondary containment. A copy of the Secondary Containment Drainage Log is included in Attachment D-4 of this SPCC Plan.

23.2 Drainage from areas outside secondary containment

There are no areas outside secondary containment that are reasonably expected to receive spills or discharges from fluids stored at the Facility. As an additional precaution, drainage ditches and road ditches are passively inspected each day as a function of Facility operations for evidence of discharges.

24.0 BULK STORAGE TANKS – 40 CFR 112.8 (c)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

Most bulk storage containers located at the Facility are expected or specified to be mobile. The location of mobile bulk storage containers at the Facility may change over time as operations progress. Appropriate updates to Facility maps will be amended to this SPCC Plan as needed.

25.0 TRANSFER OPERATIONS, PUMPING, AND IN-FACILITY PROCESSES – 40 CFR 112.8 (d)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

All aboveground valves, piping, and associated facilities will be examined by operating personnel in the following manner:

- Passive inspection conducted during normal operations. The general condition of items including joints, pipeline supports, catch pans, locking valves and metal surfaces are assessed during use. Discrepancies or concerns are immediately communicated and resolved.
- Routine inspection conducted during formal inspections and recorded on inspection records, included in Appendix B.
- Aboveground valves and piping will be examined for the general condition and integrity of items such as:
  - Flange joints;
  - Valve glands and bodies;
  - Drip pans;
  - Pipe supports; and
  - Bleeder and gauge valves.
- There is no aboveground piping or other oil transfer operation located within vehicle travel areas. In addition, verbal warnings are administered upon entrance to the Facility to inform drivers of the location of oil storage operations and prevent damage to aboveground piping.

25.1 Buried Piping

All of the tanks specified or expected to be used at the Facility and regulated under 40 CFR 112.8 will be mobile tanks. Buried piping or pipelines are not anticipated to be required given current design criteria. The piping associated with tanks will be capped or blank flanged when not in service or when in standby mode.

All pipe supports, where applicable, will be designed and installed to minimize abrasions and corrosion while allowing for expansion and contraction.

25.2 Flowline Maintenance

The Facility's flowlines will be inspected and maintained as follows:

- Oil flowline rights-of-way will be routinely observed by operating personnel when they are on location;
- All pipe supports are properly designed to minimize abrasion and corrosion and to allow for expansion and contraction;
- Buried lines (although not currently specified in design) will be cathodically protected as needed. Soils will be assessed for risk of corrosion at each facility site, and buried lines will be protected when deemed necessary;
- Check valves will be installed on header manifolds to isolate individual flow-lines;
- High/low pressure switches, anti-corrosion chemicals, and corrosion coupons will be used as needed;
- Piping not in service or on standby for an extended period is to be capped and marked at the terminal connection;
- Flowline maintenance will include repair or replacement of lines based on leak frequency. All repaired and replaced lines will be pressure tested with fresh water prior to being placed back into service where appropriate;
- Flowline pressure tests will be documented and records kept; and
- The flowline maintenance program will include annual examinations, corrosion protection, as appropriate, flowline replacement, and adequate records for the Facility.

26.0 OIL WATER SEPARATORS – 40 CFR 112.8 (d)

This section to be updated upon completion of construction and at least two weeks prior to commencement of commercial operation.

27.0 PLAN UNDERSTANDING AND ACKNOWLEDGEMENT

I have read this Spill Prevention, Control and Countermeasure Plan and agree to adhere to and perform the activities required by the Plan to the best of my ability. Any part of the Plan to which I do not understand, I have contacted the Environmental Department for guidance.

Facility Manager:_____ Date:_____

Office Manager:_____ Date:_____

Foreman:_____ Date:_____

Foreman:_____ Date:_____

Foreman:_____ Date:_____

Other:_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

_____ **Date:**_____

Attachment D-1

Secondary Containment Calculations

Tenaska Westmoreland Generating Station
Secondary Containment Calculations

Unit Description	Map Reference Number	Containment Type	Unit Containment Dimensions (ft)			Total Unit Containment Volume		Occupied Volume Descriptions	Occupied Containment Volume		Effective Containment Volume		Required Containment Volume			Is Containment Sufficient
			Height	Width	Length	ft^3	gallons		ft^3	gallons	ft^3	gallons	Largest Tank (gallons)	Precipitation Volume* (gallons)	Total Required Volume (gallons)	
Oil Storage																
Container No. 1	1					0	0		0	0		0		0	0	
Container No. 2	2					---			---	---	---	0		0	0	
Container Nos. 3, 4, & 5	3					0	0		0	0	0	0		0	0	
Container No. 6	4					0			0	0	0	0		0	0	
Container No. 7	3					---			---	---	---	0		0	0	
Oil Filled Equipment																
Container No. 8	5					0	0		0	0	0	0		0	0	
Container No. 9	5					0	0		0	0	0	0		0	0	
Container No. 10	6					0	0		0	0	0	0		0	0	
Container No. 11	7					0	0		0	0	0	0		0	0	
Container No. 9																
Container No. 10 -																
Container No. 11																
Container No. 12																
Container No. 13																
Container No. 14																

Precipitation calculated based on exposed containment area x 1.62-inch of precipitation from a 25-year-24-hour storm.
Precipitation storm yield derived from the Precipitation Atlas of the United States,
National Oceanic and Atmospheric Administration, Atlas 14, Volume I, Version 4.

Attachment D-2

Certification of the Applicability of the Substantial Harm Criteria

APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

FACILITY NAME: Westmoreland Generating Station

FACILITY ADDRESS: TBD

Does the facility transfer oil over-water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes _____ No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons *and*, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above-ground oil storage plus sufficient freeboard to allow for precipitation.

Yes _____ No X

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

Yes _____ No X

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

Yes _____ No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons *and* has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes _____ No X

Certification

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

Signature: _____

Name: _____

Title: _____

Date: _____

Attachment D-3

SPCC Review checklist

(All forms may be periodically modified without a formal SPCC Plan amendment)

FIVE YEAR REVIEW CHECKLIST
WESTMORELAND GENERATING STATION SPCC PLAN

1	Has the facility had any oil spills greater than 1,000 gallons in a single event; OR greater than 42 gallons in each of two events within any 12-month period?	Yes ☐	No ☐
2	Has the facility added any new tanks (aboveground or underground greater than 55 gallons)?	Yes ☐	No ☐
3	Has the facility removed any tanks?	Yes ☐	No ☐
4	Has there been any change in tank operation (i.e., change in operating temperature or pressure)?	Yes ☐	No ☐
5	Has there been any change to tank contents?	Yes ☐	No ☐
6	Do all tanks have high level alarms; OR are manually filled with a site tube or level indicator?	Yes ☐	No ☐
7	Have there been any changes to tank or site secondary containment?	Yes ☐	No ☐
8	Has there been any changes to site drainage?	Yes ☐	No ☐
9	Has any buried piping been added to the facility?	Yes ☐	No ☐
10	Is there any out-of-service piping?	Yes ☐	No ☐
11	Have there been any changes to aboveground piping such that it is subject to vehicular damage?	Yes ☐	No ☐
12	Have there been any changes to piping supports?	Yes ☐	No ☐
13	Have there been any changes in tank truck loading/unloading procedures?	Yes ☐	No ☐
14	Are inspections being performed on the schedule described with the Plan?	Yes ☐	No ☐
15	Are the oil-handling personnel being trained at least annually?	Yes ☐	No ☐
16	Have there been any changes to station access or security?	Yes ☐	No ☐
17	Have there been any changes to emergency contacts?	Yes ☐	No ☐
18	Has facility reviewed all applicable state and local regulations?	Yes ☐	No ☐

ATTACHMENT D-4

Secondary Containment Drainage Log

(All forms may be periodically modified without a formal SPCC Plan amendment)

SECONDARY CONTAINMENT DRAINAGE LOG

40 CFR 112 requires a continuous watch when draining rain water from any petroleum secondary containment facility. Any oil present on the water surface must be removed prior to opening a discharge valve. It is important to keep containment structures clean and well maintained to avoid oil contamination.

My signature, below, certifies that I have examined the containment facility, removed visible oil from the water surface, repaired or reported all leaks, and closed and locked the containment drain valve prior to departure.

Date	Location	Oil Present (Yes/No)	Drain Opened (Time)	Drain Closed (Time)	Volume (gal)	Signature

*THIS RECORD MUST BE KEPT ON FILE FOR A MINIMUM OF THREE (3) YEARS.

***To approximate the volume of water drained from the structure, multiply the depth of standing water by the containment dimensions (all dimensions should be in feet). Multiply the volume by 7.48 to convert to gallons.**

Attachment D-5

Oil Release/Spill Report

(All forms may be periodically modified without a formal SPCC Plan amendment)

OIL/CHEMICAL RELEASE AND SPILL CLEANUP REPORT

Complete Both Pages of This Form

RELEASE INFORMATION:

Employee Discovering Spill:_____ Phone:_____

Reported by:_____ Title/Phone:_____

Material Released:_____ Time/Date of Release:_____

Facility and/ or Location of spill: _____
_____

Quantity Released (Actual or Estimate): _____ Weather Conditions: _____

Cause of Release (description): _____
_____

Did release/spill get into soil or the air? If yes, describe where: _____

Describe efforts taken to contain spill:_____
_____

Injuries to employees or public (list names and injuries): _____

Damage to public or private property: _____

CLEANUP INFORMATION:

Employee in charge of cleanup: Name_____ Phone_____

Is pre-cleanup sampling necessary to establish spill boundaries because of insufficient visible traces? □ Yes □ No

If Yes, describe sample method used for determining spill boundaries: _____
_____
_____

Describe solid surfaces cleaned and the method of cleaning: _____
_____
_____
_____

Describe depth and amount of soil removed: _____
_____
_____

DIAGRAM OF SPILL SITE (Use additional sheets if necessary)

Number of samples taken: Pre-cleanup _____ Post-cleanup _____ Not Required _____

List results, attach analytical report, or reference the chain of custody report or analytical report number:
Pre-cleanup sample results: _____

Post-cleanup sample results: _____

Cleanup began: TIME:_____ DATE:_____ Cleanup complete: TIME: _____ DATE: _____

Resource hours needed for cleanup: _____

If cleanup was delayed by emergency or adverse weather, explain the nature and duration of the delays: _____
_____
_____

I have reviewed the information in the record and have ascertained that it is true and accurate to the best of my knowledge.

_____ (Name) _____ (Date)

FIGURES

TO BE ADDED