ADOT SPCC Template Review Guidance

This guidance document will assist reviewers in complete review of the 2023 Arizona Department of Transportation (ADOT) Spill Prevention, Control, and Countermeasure Plan (SPCC) Template. The template was developed to incorporate Section 104.16.C "General Clean Water Act Spill Prevention, Control and Countermeasures (SPCC)" of ADOT Standard Specifications (2021 edition). The ADOT SPCC Template is a tool to be used by contractors when "*using, storing, transferring, or otherwise handling oils (oils, greases, fuel, asphalt cement, asphalt derivatives) at the construction site"*.

This review guidance will help ensure the ADOT SPCC Template is fully populated, yet reviewers will have to pay attention to what is written and included in the language contractors provide. Accurate and up to date information is a requirement of both EPA and Title 40 Code of Federal Regulations (CFR) Part 112. *"… I believe that the submitted information is true, accurate, and complete."*

Should you still have questions, or require further guidance, please contact:

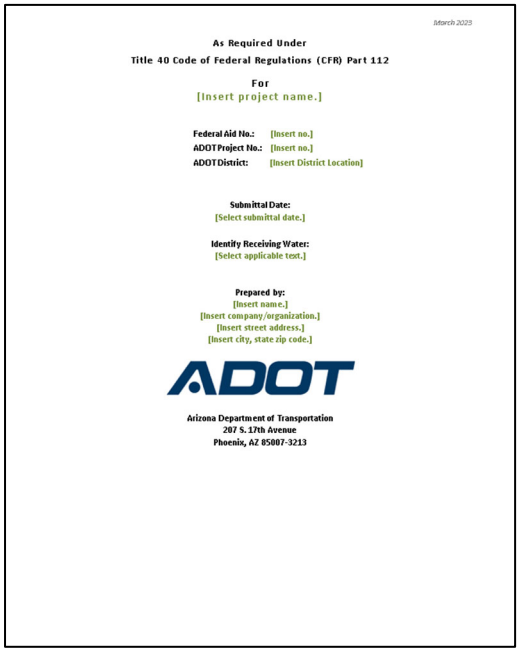
David Mack, CHMM
ADOT Industrial Stormwater/SPCC Program Coordinator
1221 S. 2nd Ave.
Tucson, AZ 85713
602.376.7935
dmack@azdot.gov
azdot.gov

ADOT SPCC Template Review Guidance

The 2023 ADOT SPCC Template and other updated templates (Stormwater Pollution Prevention Plan, Monitoring Sampling and Analysis Plan Template, Inspection Report Template) can be found on ADOT webpage under Home / Business / Environmental Planning / Water Resources / Additional Resources Water Resources https://azdot.gov/sites/default/files/SPCC-March-2023.dotx

A set of SPCC Instructions can also be found within the Template (use the Paragraph button "¶" to reveal hidden text). However, these are instructions on the proper way to use all template features active. A user should not use Internet Explorer© as that program is de-platformed and has not had a security upgrade for several years. Using Firefox Mozilla© has the ability to improperly carry over all template features. Microsoft Edge©, using Microsoft Office 2010© or newer will download the template with full functionality.

Once you find the SPCC Template on ADOTs webpage, open the file and save it to your computer before trying to use the template. It is also imperative if you use Microsoft Word 2010 or later, you ensure that the "Maintain Compatibility" box is checked.


March 2023

As Required Under
Title 40 Code of Federal Regulations (CFR) Part 112

For
[Insert project name.]

Federal Aid No.: [Insert no.]
ADOT Project No.: [Insert no.]
ADOT District: [Insert District Location]

Submittal Date:
[Select submittal date.]

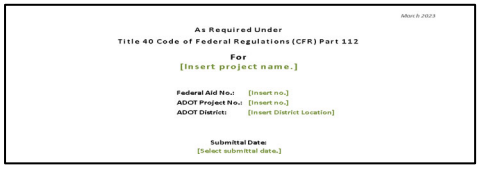
Identify Receiving Water:
[Select applicable text.]

Prepared by:
[Insert name.]
[Insert company/organization.]
[Insert street address.]
[Insert city, state zip code.]

ADOT

Arizona Department of Transportation
207 S. 17th Avenue
Phoenix, AZ 85007-3213

Once you have properly saved the Template, it will have a new look and a new revision date of 2022 at the top right hand. The template is populated with **green font** in all areas where the user will need to address, select, or add their own language. Once the user makes a selection or adds their own language, that font will revert to plain text in black font. This is an easy review tool to make sure all areas have at least been addressed. If the reviewer finds any **green font** remaining in a submitted drafted SPCC, the SPCC will be rejected.

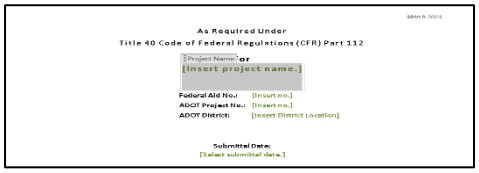

March 2023

As Required Under
Title 40 Code of Federal Regulations (CFR) Part 112

For
[Insert project name.]

Federal Aid No.: [Insert no.]
ADOT Project No.: [Insert no.]
ADOT District: [Insert District Location]

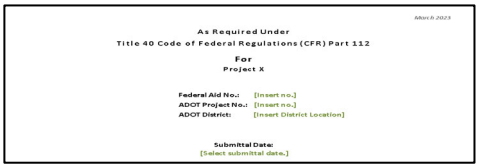
Submittal Date:
[Select submittal date.]


As Required Under
Title 40 Code of Federal Regulations (CFR) Part 112

[Project Name] or
[Insert project name.]

Federal Aid No.: [Insert no.]
ADOT Project No.: [Insert no.]
ADOT District: [Insert District Location]

Submittal Date:
[Select submittal date.]


March 2023

As Required Under
Title 40 Code of Federal Regulations (CFR) Part 112

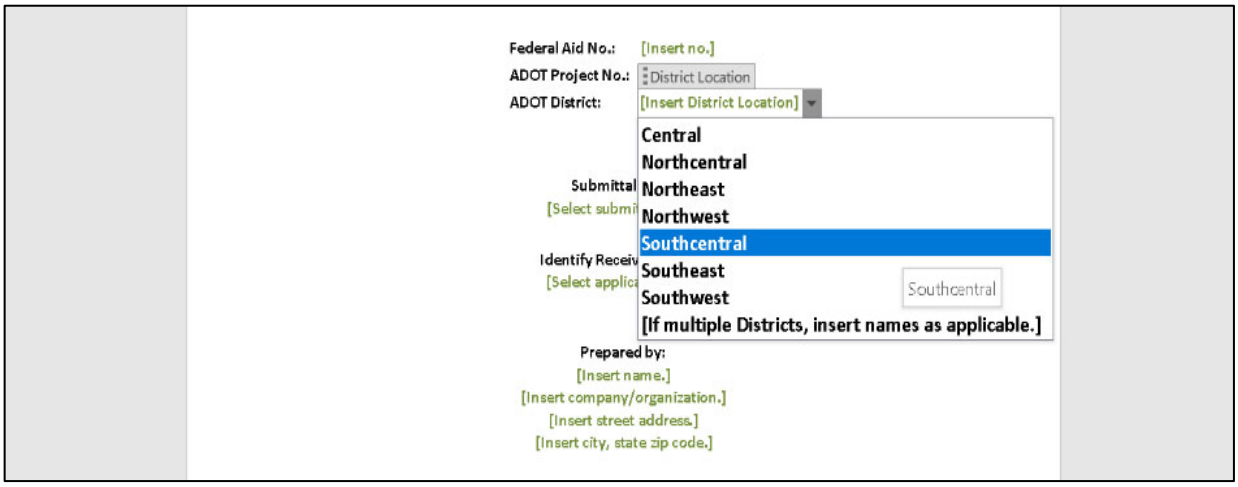
For
Project X

Federal Aid No.: [Insert no.]
ADOT Project No.: [Insert no.]
ADOT District: [Insert District Location]

Submittal Date:
[Select submittal date.]

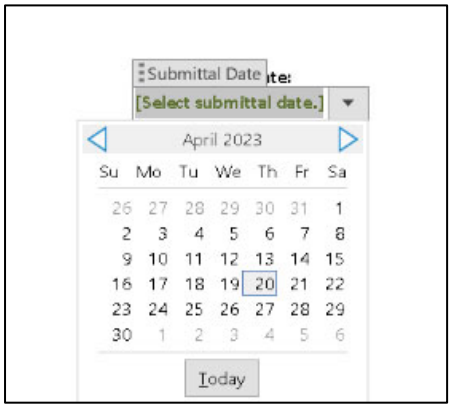
ADOT SPCC Template Review Guidance

The template has seveal features designed to help the template user, including language that can be typed over, copied, and toggled; such as the date selector. All of the information on the cover page will be information they can find on the Bid-Set/Plans. Notice that the district loaction will be selected for the district the project is taking place in and not ADOT Phoenix District offices.



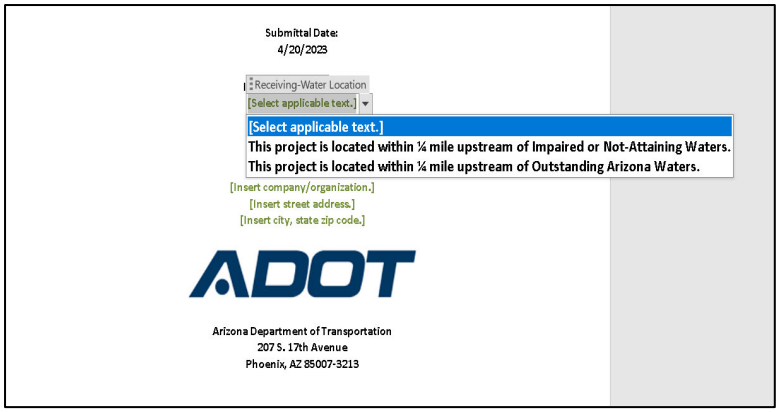
One dropdown list that the template user will have to populate is on the cover page due to sensitivity of the project (i.e., if the receiving water listed as Impaired, Outstanding Arizona Water, or listed by EPA). The Project Bid Set and the Control Measure Index Sheet (CMIS) should identify any waterbody listing. If the waterbody is listed, the template will require the user to populate the Waterbody Identification (WBID) number and select from the dropdown list what the impairment is for the waterbody. These water body reach numbers can be found on ADEQ's website, even if the project is on tribal land for EPA-CGP SPCCs. ADEQ GIS Maps can be accessed here:

https://adeq.maps.arcgis.com/apps/webappviewer/index.html?id=e224fc0a96de4bcda4b0e37af3a4daec&showLayers=Counties;Impaired%20-%20Lakes%202022;Impaired%20-%20Streams%202022



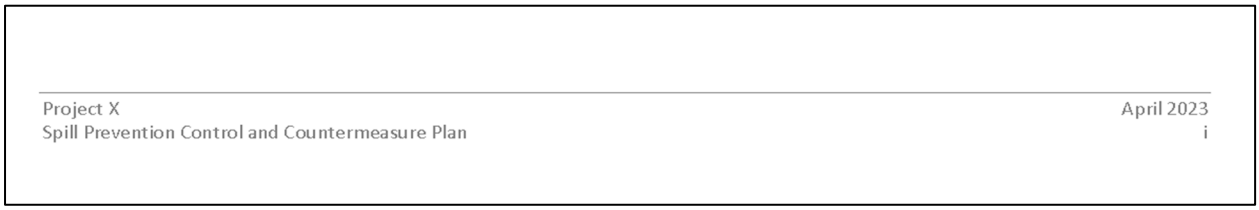
All date prompts will allow users to click on dates of a calendar, and the date will populate with text (for example: the date selected in the image will read "**4/05/2023**").

The cover page also has a prompt pertaining to receiving waters. This is a quick look for Reviewers, Engineers, and regulators to get a quick understanding pertaining to whether or not the project is within a ¼ upstream of a listed water for regulatory purposes such as Outstanding Arizona Water (OAW), Impaired, Non-Attainting, or even EPA listed waters.



If an Impaired or Outstanding Water is within ¼ mile upstream of an ADEQ listed river, the project will have to list the stream name, reach number (hydrologic unit code (HUC)) and listed impairment from the dropdown menu. As with all drop-down menus, this can be copied and pasted if several waterbodies have been listed for the project area. This information may be crucial for local, State, or Federal response/contact requirements for spills.

This section requires a project name and the date the SPCC will be submitted to ADOT. Updating one page in each section (i.e., the Cover, Table of Contents, List of Attachments, Incorporated References, and List of Abbreviations) is required because there are different sections than the Narrative portion, and Attachments).

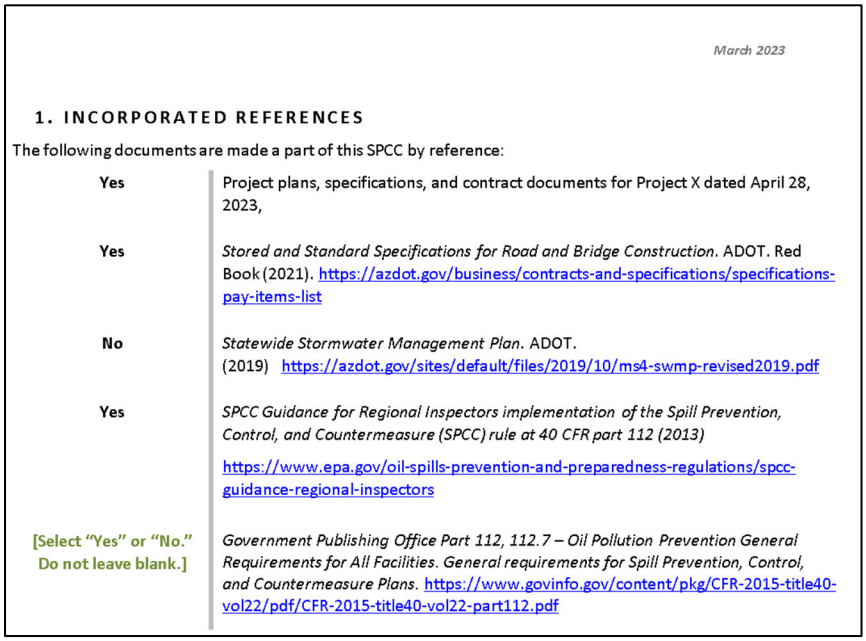


This disclaimer is intended to place responsibility of the SPCC on the template preparer. No claim can be made against ADOT by simply populating the template. The template is a guidance tool.

Disclaimer:

This SPCC Template was designed with the intent to provide guidance and a format for SPCC development and to assist a SPCC writer with necessary elements required under the Title 40 CFR, and the requirements of ADOT Specification 140.16.C. It is the responsibility of the Contractor/Operator to include all correct and proper information, understand the CFR requirements and create a document that meets regulatory compliance.

Incorporated References



March 2023

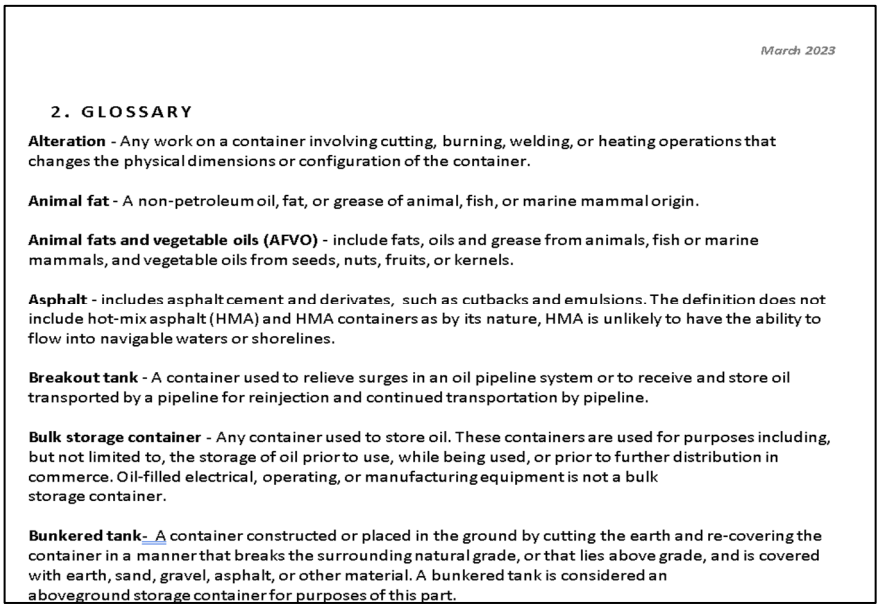
1. INCORPORATED REFERENCES

The following documents are made a part of this SPCC by reference:

Yes	Project plans, specifications, and contract documents for Project X dated April 28, 2023,
Yes	*Stored and Standard Specifications for Road and Bridge Construction*. ADOT. Red Book (2021). https://azdot.gov/business/contracts-and-specifications/specifications-pay-items-list
No	*Statewide Stormwater Management Plan*. ADOT. (2019) https://azdot.gov/sites/default/files/2019/10/ms4-swmp-revised2019.pdf
Yes	*SPCC Guidance for Regional Inspectors implementation of the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112 (2013)* https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-guidance-regional-inspectors
[Select "Yes" or "No." Do not leave blank.]	*Government Publishing Office Part 112, 112.7 – Oil Pollution Prevention General Requirements for All Facilities. General requirements for Spill Prevention, Control, and Countermeasure Plans.* https://www.govinfo.gov/content/pkg/CFR-2015-title40-vol22/pdf/CFR-2015-title40-vol22-part112.pdf

This section has a toggle for "yes" or "no" and the SPCC Writer must answer one way or the other. <u>If this section is left blank, the SPCC will be rejected.</u> Should SPCC Writers need access to the documents that are not issued with the plan set, links have been provided. Note the top sentence: "The following documents are made a part of this SPCC by reference:" Once the "Yes" selection has been chosen, the SPCC has incorporated the entire referenced document. Many arguments in the field have arisen based on whether the manuals listed are part of the contract or are merely guidance. This argument has mostly been removed because the incorporation of a manual by saying "Yes" makes that manual part of the Contractor's SPCC. All requirements must be met to the R.E.'s satisfaction.

Also note the date at the top of the SPCC Template is the Template revision date. From this point until the next revision date "**March 2023**" should be reflected, or the SPCC Writer is using the wrong/outdated form.



March 2023

2. GLOSSARY

Alteration - Any work on a container involving cutting, burning, welding, or heating operations that changes the physical dimensions or configuration of the container.

Animal fat - A non-petroleum oil, fat, or grease of animal, fish, or marine mammal origin.

Animal fats and vegetable oils (AFVO) - include fats, oils and grease from animals, fish or marine mammals, and vegetable oils from seeds, nuts, fruits, or kernels.

Asphalt - includes asphalt cement and derivates, such as cutbacks and emulsions. The definition does not include hot-mix asphalt (HMA) and HMA containers as by its nature, HMA is unlikely to have the ability to flow into navigable waters or shorelines.

Breakout tank - A container used to relieve surges in an oil pipeline system or to receive and store oil transported by a pipeline for reinjection and continued transportation by pipeline.

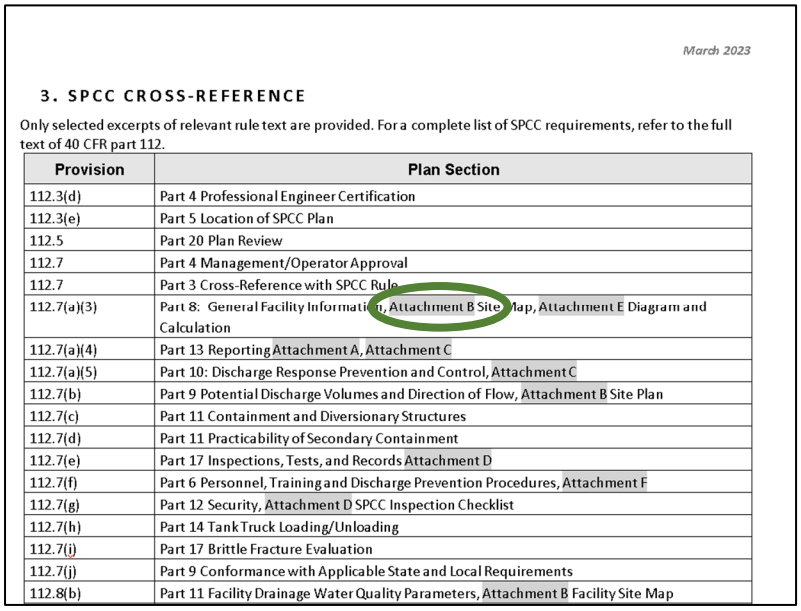
Bulk storage container - Any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

Bunkered tank- A container constructed or placed in the ground by cutting the earth and re-covering the container in a manner that breaks the surrounding natural grade, or that lies above grade, and is covered with earth, sand, gravel, asphalt, or other material. A bunkered tank is considered an aboveground storage container for purposes of this part.

Glossary

The Glossary section is important for SPCC development as many of the terms associated with fuels and oils can be defined in many ways. Title 40 CFR is quite specific regarding what it regulates, and the definitions are not loose interpretation (e.g., oil, synthetic oils, nonpetroleum oil, etc.).

SPCC Cross-Reference



March 2023

3. SPCC CROSS-REFERENCE

Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

Provision	Plan Section
112.3(d)	Part 4 Professional Engineer Certification
112.3(e)	Part 5 Location of SPCC Plan
112.5	Part 20 Plan Review
112.7	Part 4 Management/Operator Approval
112.7	Part 3 Cross-Reference with SPCC Rule
112.7(a)(3)	Part 8: General Facility Information, Attachment B Site Map, Attachment E Diagram and Calculation
112.7(a)(4)	Part 13 Reporting Attachment A, Attachment C
112.7(a)(5)	Part 10: Discharge Response Prevention and Control, Attachment C
112.7(b)	Part 9 Potential Discharge Volumes and Direction of Flow, Attachment B Site Plan
112.7(c)	Part 11 Containment and Diversionary Structures
112.7(d)	Part 11 Practicability of Secondary Containment
112.7(e)	Part 17 Inspections, Tests, and Records Attachment D
112.7(f)	Part 6 Personnel, Training and Discharge Prevention Procedures, Attachment F
112.7(g)	Part 12 Security, Attachment D SPCC Inspection Checklist
112.7(h)	Part 14 Tank Truck Loading/Unloading
112.7(i)	Part 17 Brittle Fracture Evaluation
112.7(j)	Part 9 Conformance with Applicable State and Local Requirements
112.8(b)	Part 11 Facility Drainage Water Quality Parameters, Attachment B Facility Site Map

The cross-reference is a required portion of any SPCC developed to meet Title 40 CFR. Notice the provision of 40 CFR all being headed under Part 112. In the Plan Section callout column, gray boxes highlight what section the SPCC writer should have placed the required information. If an ADOT SPCC reviewer tries to locate "**Site Map**" they would look under "**Attachment B**". The reviewer should not waste time searching other tabs of a SPCC to locate a requirement simply because it was not included where instructed.

112.7(a)(3)	Part 8: General Facility Information, Attachment B Site Map, Attachment E Diagram and Calculation

Certification and Notification

This section of the SPCC is extremely important to get correct, not only from an Operator identification standpoint, but for certification purposes.

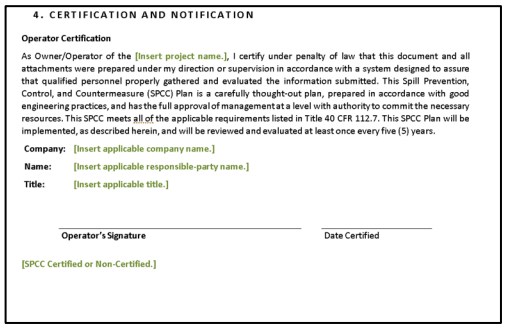
After populating the Company, Name, and Title of the signatory, a dropdown menu pertaining to certification can be found titled **[SPCC Certified or Non-Certified]**. This certification requirement pertains to gallons of oil/fuel on site. Choices are:

"*Because this plan is only written for a facility with no spill history, and has at least 1,320-gallons, but less than 10,000-gallons, no PE Certification is required.*"

Certain facilites with a spill history would still require an engineer stamp.

If the facility has over 10,000 gallons in total oil storage capacity, the Operator will sign, and they will need a Professional Engineer (Arizona Stamp) to certify your plan. The user can simply insert their chosen P.E. approved stamp where the sample have been provided.

Remember this is capacity of cells, not the amount of fuel/oil in the cells (e.g., 50 gallons in a 100-gallon tank is still 100-gallon capacity!).



4. CERTIFICATION AND NOTIFICATION

Operator Certification

As Owner/Operator of the [Insert project name.], 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 assure that qualified personnel properly gathered and evaluated the information submitted. This Spill Prevention, Control, and Countermeasure (SPCC) Plan is a carefully thought-out plan, prepared in accordance with good engineering practices, and has the full approval of management at a level with authority to commit the necessary resources. This SPCC meets all of the applicable requirements listed in Title 40 CFR 112.7. This SPCC Plan will be implemented, as described herein, and will be reviewed and evaluated at least once every five (5) years.

Company: [Insert applicable company name.]

Name: [Insert applicable responsible-party name.]

Title: [Insert applicable title.]

Operator's Signature | Date Certified

[SPCC Certified or Non-Certified.]

Control, and Countermeasure (SPCC) Plan is a carefully thought-out plan, prepared in accordance with good engineering practices, and has the full approval of management at a level with authority to commit the necessary resources. This SPCC meets all of the applicable requirements listed in Title 40 CFR 112.7. This SPCC Plan will be implemented, as described herein, and will be reviewed and evaluated at least once every five (5) years.

Company: Bigg Construction Inc.

Name: Mr. Bigg

Title: Boss

rator's Signature | Date Certified

Certified

Certified

Company: Bigg Construction Inc.

Name: Mr. Bigg

Title: Boss

Operator's Signature | Date Certified

Sample Only Click Picture Icon to Change

Project Name: [Insert project name.]

Federal Aid No.: [Insert Fed Aid no.]

ADOT Project No.: [Insert ADOT project no.]

Engineer's Name: [Engineer's name.]

Engineer's Signature

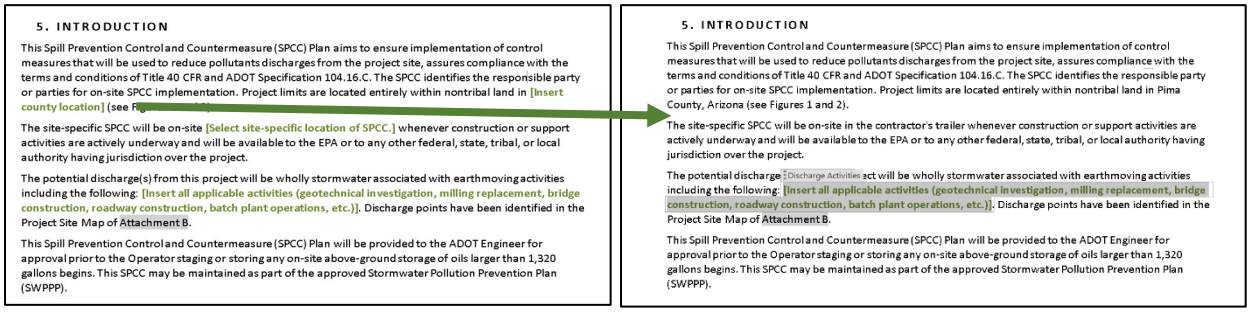
Date Approved

Engineer's Phone Number: [(111-222-3333)]

ADOT SPCC Template Review Guidance

Introduction

The SPCC Template Introduction is standard information to provided required data pertaining to location, activities, discharge points and jurisdiction. All green text fields should no longer remain green once information is inserted, or a selection is chosen.



5. INTRODUCTION

This Spill Prevention Control and Countermeasure (SPCC) Plan aims to ensure implementation of control measures that will be used to reduce pollutants discharges from the project site, assures compliance with the terms and conditions of Title 40 CFR and ADOT Specification 104.16.C. The SPCC identifies the responsible party or parties for on-site SPCC implementation. Project limits are located entirely within nontribal land in [Insert county location] (see F

The site-specific SPCC will be on-site [Select site-specific location of SPCC.] whenever construction or support activities are actively underway and will be available to the EPA or to any other federal, state, tribal, or local authority having jurisdiction over the project.

The potential discharge(s) from this project will be wholly stormwater associated with earthmoving activities including the following: [Insert all applicable activities (geotechnical investigation, milling replacement, bridge construction, roadway construction, batch plant operations, etc.)]. Discharge points have been identified in the Project Site Map of Attachment B.

This Spill Prevention Control and Countermeasure (SPCC) Plan will be provided to the ADOT Engineer for approval prior to the Operator staging or storing any on-site above-ground storage of oils larger than 1,320 gallons begins. This SPCC may be maintained as part of the approved Stormwater Pollution Prevention Plan (SWPPP).

5. INTRODUCTION

This Spill Prevention Control and Countermeasure (SPCC) Plan aims to ensure implementation of control measures that will be used to reduce pollutants discharges from the project site, assures compliance with the terms and conditions of Title 40 CFR and ADOT Specification 104.16.C. The SPCC identifies the responsible party or parties for on-site SPCC implementation. Project limits are located entirely within nontribal land in Pima County, Arizona (see Figures 1 and 2).

The site-specific SPCC will be on-site in the contractor's trailer whenever construction or support activities are actively underway and will be available to the EPA or to any other federal, state, tribal, or local authority having jurisdiction over the project.

The potential discharge Discharge Activities ct will be wholly stormwater associated with earthmoving activities including the following: [Insert all applicable activities (geotechnical investigation, milling replacement, bridge construction, roadway construction, batch plant operations, etc.)]. Discharge points have been identified in the Project Site Map of Attachment B.

This Spill Prevention Control and Countermeasure (SPCC) Plan will be provided to the ADOT Engineer for approval prior to the Operator staging or storing any on-site above-ground storage of oils larger than 1,320 gallons begins. This SPCC may be maintained as part of the approved Stormwater Pollution Prevention Plan (SWPPP).

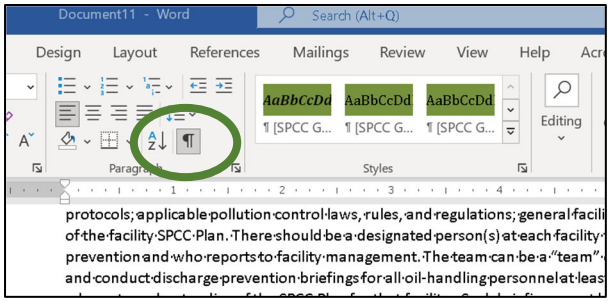
Personnel (SPCC Team)

Code of Federal Regulations Title 40 requires trained personnel in Section 112.7(f). At a minimum, personnel must be trained in: oil-handling, operation and maintenance of equipment to prevent discharges, discharge protocols, applicable pollution control laws, rules, and regulations, general facility operations, and the contents of the facility SPCC Plan.

SPCC Team

The trained and authorized personnel for this project is **[Insert Rep's Name]**. The Personnel Training and Qualifications Log is located in Attachment F of this SPCC.

Company:	**[Insert company name.]**
Address:	**[Insert address *(Street, Suite/Unit/etc., City, State Abbrev. Zip Code).*]**
Phone:	**[Insert phone number *(111-222-3333).*]**
E-Mail:	**[Insert hyperlinked e-mail address.]**
Responsibilities	Supervise and direct all activities pertaining to **[Insert Project Name]**, monitoring, and implementation, including control-measure installation and maintenance and correction to comply with 40 CFR 112 standards for conducting sampling, tracking, handling and report keeping and submittal.



The term "Team" is a regulation stated term, and a facility can have a "Team" of one person. Many facilities will have more than one member of team and additional personnel can be added at this point. By turning on the paragraph button "¶" inserted hidden text will be shown and instructions on how to make additional team member contacts will be revealed.

To add more rows, please follow these steps:¶

1. → Left-click your mouse on the outside of the second cell of the last row. Hold and drag your mouse from right to left to select the entire row.¶

2. → Hover your mouse over the selected row and then right-click and select "Copy."¶

3. → Right-click again and select "Paste Rows."¶

4. → Repeat Step 3 (or press Ctrl+Y) as many times as needed to insert your desired number of additional rows.¶

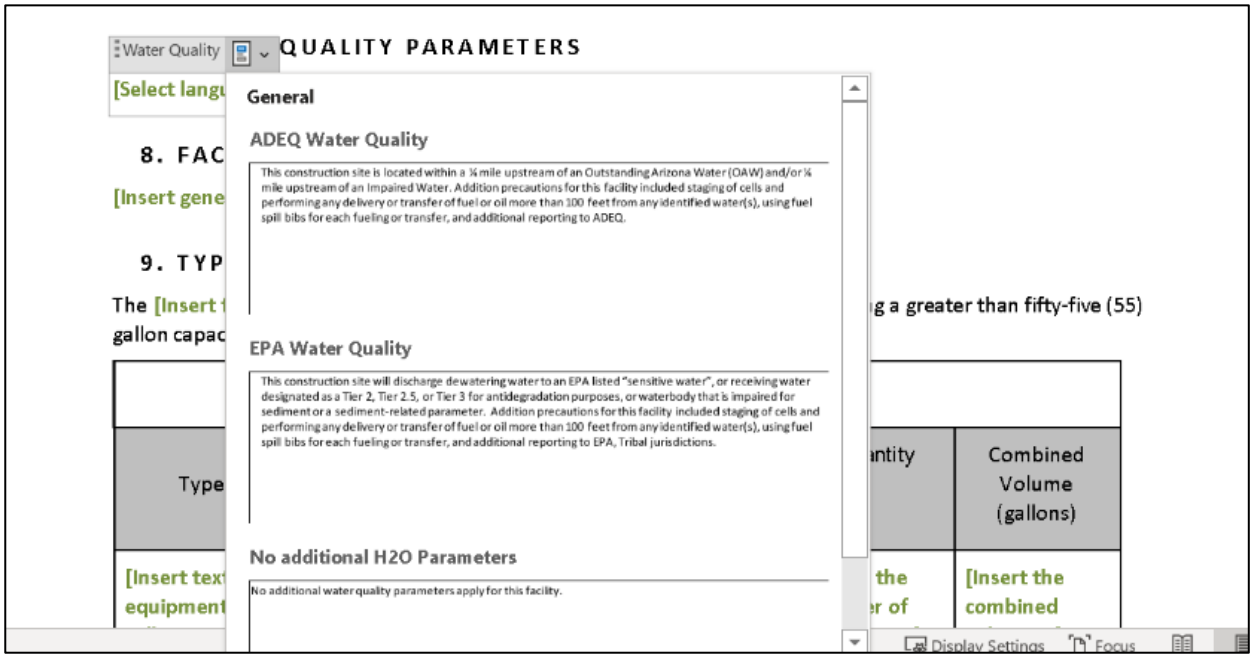
The SPCC Team section prompts writers to discuss level of training for team members including inspection, spill reporting, PPE, First Aid, etc. This section also prompts writers to provide information in Attachments A and D.

Training

Before any inspection is to take place, SPCC Team personnel will be trained for proper usage of field inspection equipment and procedures for visual inspection. This plan contains a contact list (Attachment D) that is to be used to contact and communicate any non-compliance with the regulations or SPCC plan such as exceedances in testing parameters or mobilization to correct, contain, remediate a spill. The phone tree (Attachment A) also clearly defines the notification responsibilities of the individuals listed.

Water Quality Parameters and Facility Information

This section of the Template allows a writer to toggle or pulldown information pertaining to a waterbody that has potential to receive discharge from a potential spill. Having this knowledge and understanding upfront will assist in proper spill response procedures and requirements for spill recording vs. spill reporting. Facility information should be found in the ADOT Bid Set pertaining to project description. Not all ADOT contractor activities have a Bid Set, or Special Provision. SPCC Writers will have to include additional information not provided by ADOT for the project. (Example: *In addition to the 600-gallon fuel cell in secondary containment at Station 1365+50- Rt, two (2) 50-gallon saddle tanks will be used for mobile fueling and locations will be updated in this SPCC each working week.*")



Type of Facility

9. TYPE OF FACILITY

The [Insert facility Type Infromation.] contains the following equipment containing a greater than fifty-five (55) gallon capacity of oil (containment drums, tanks, bladders, bulk storage, etc.):

OIL-FILLED EQUIPMENT				
Type of Equipment	Type of Oil	Volume (gallons)	Quantity	Combined Volume (gallons)
Mobile Fueler	Petroleum Oils	1,000	2	2000

Gallons

Each piece of oil-filled equipment is designed to operate as a sealed unit. The equipment listed above will be only opened in the field to collect an oil sample for testing, to pump out oil to service the equipment, or to refuel. Other potentials for releasing oil include equipment failures and tank ruptures due to incidents in handling or shipping, internal failures, and/or vandalism. The facility will not be manned outside of standard working hours. Personnel will be at the facility for construction work, routine inspections per SPCC conditions, and/or for general operation(s).

The SPCC writer will need to insert information pertaining to what the facility houses at the site and list the equipment containing a greater than fifty-five (55) gallon capacity of oil (containment drums, tanks, bladders, bulk storage, etc.). This is another area requiring population of green text or a drop-down menu for selection.

Oil Spill Analysis

This section deals with any oil released from equipment or fuel cells that would be stored in secondary containment and includes oil absorbing materials and spills kits used to clean up and properly containerize spill/leak and spill/leak clean up material(s) upon discovery.

Potential Spill Volume and Rates

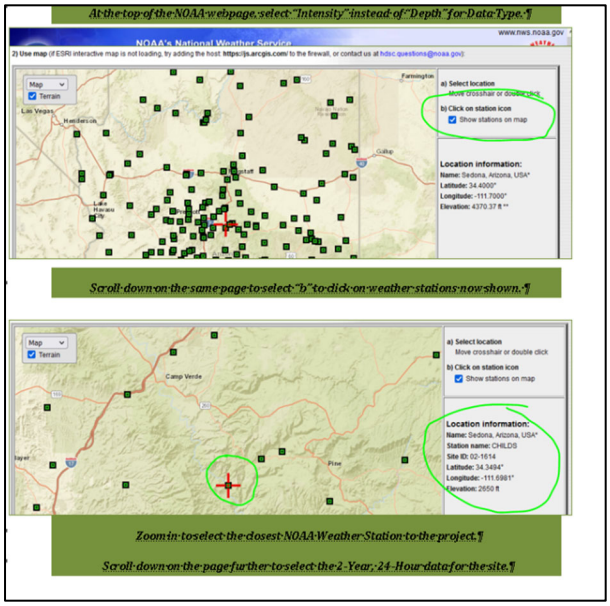
Potential Event	Volume Released	Release Rate
Broken gasket, or leaking hose	Gallons	Gradually

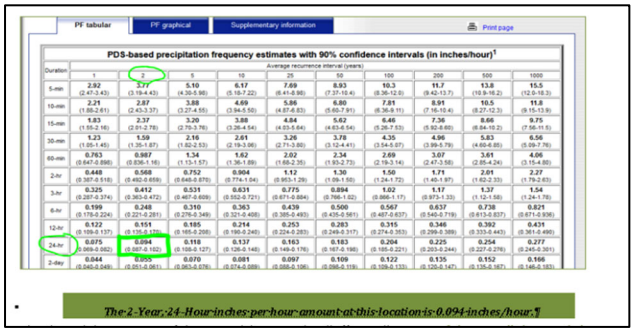
Rate

Instantaneous
Gradually
Other

Added to the release rates above, the SPCC writer must consider a runoff rate to include the local maximum **2-Year, 24-Hour** rainfall year period, and the physical characteristics of the site and site soils.

The template assists SPCC writers in finding the local **2-Year, 24-Hour** rainfall intensity by providing the NOAA website and If the SPCC writer needs assistance in determining the rates, by depressing the paragraph button (¶), hidden text and guidance to defendable sources of this information can be obtained.



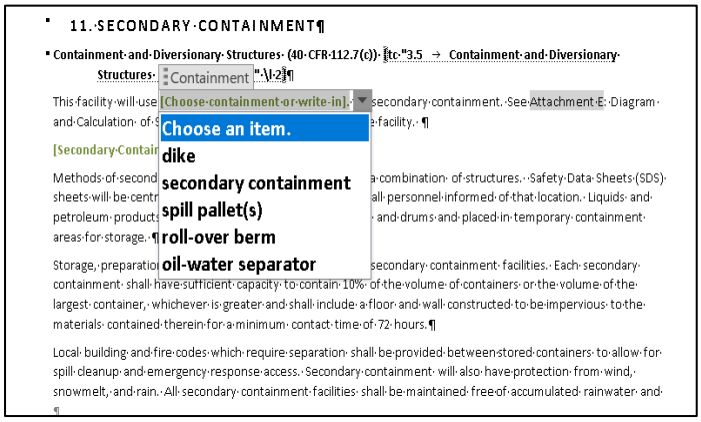


Although the SPCC rule does not require you to show the calculations of sized **secondary containment** in your plan, you should maintain documentation of secondary containment calculations to demonstrate compliance to an inspector.

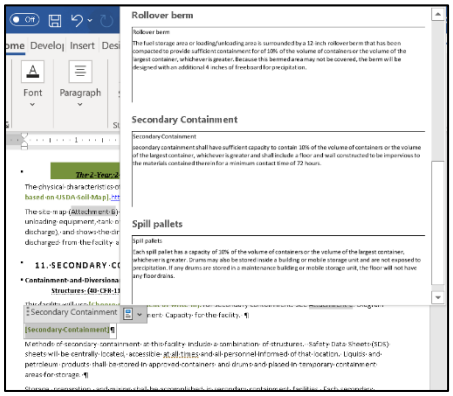
The soil types at the site can be obtained by using a defendable source (linked) and the physical characteristics of the site soils can be determined. http://websoilsurvey.nrcs.usda.gov/app/.

Secondary Containment

This section allows the SPCC writer to choose the secondary containment device(s) to be used at the facility. Clicking on the "Containment" dropdown menu allows specific and industry standard devices, or just by typing over the green text, SPCC writers can write-in their own choice. An ADOT R.E. on an ADOT Construction project has the option to approve or disapprove of choices of the SPCC writer.



The Secondary Containment dropdown menu below allows SPCC writers to elaborate on the chosen method with provided text, creation of their own text, or manufactures information.



Note that if this SPCC is applicable to an ADOT Construction Project (TRACS number), the ADOT Erosion and Pollution Control Manual for Highway Design and Construction (EPCM) should be used as a baseline. An approved SPCC will suffice in place of secondary calculations required by the EPCM.

Using the same method from the **Oil Spill Analysis** section above to determine a **25-year, 24-hour** storm event will be necessary to calculate the secondary containment volumes where containment is not covered form the elements.

EPA believes that the proper standard of "sufficient freeboard" to contain precipitation is that amount necessary to contain a **25-year, 24-hour** storm event. While EPA believes that a **25-year, 24-hour** storm event is appropriate for most facilities and protective of the environment, it did not make it rule standard because of the difficulty and expense for some facilities of securing recent information concerning such storm events at this time. There are several different types of secondary containment measures that could be used at a facility. EPA does not dictate which method must be used, only that it must meet at least the requirements discussed above.

Example Text: *The bulk storage tank at the Yard area will be constructed with a lined containment system. The containment system has a total capacity of 6,500 gallons and is intended to provide secondary containment for on-site equipment refueling. Its volume is sufficient to contain a release from the largest compartment of a tanker trunk, 6,000 gallons, as documented in Attachment E of this Plan. Its volume is also sufficient to contain precipitation from a **24-hour, 25-year** storm event, **0.16** inches. The built-in containment is an excavated 25-foot x 40-foot area (approximate dimensions subject to change but sufficient volume will remain), lined with a synthetic impervious material.*

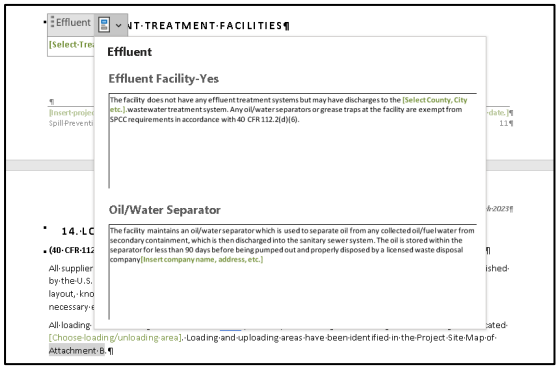
1 U.S. Gallon = 0.133681 Ft^3

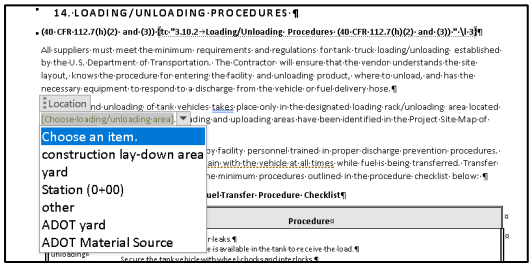
Security

Security is an important variable in SPCC development. Title 40 CFR 112.7(g) requires this discussion in any written SPCC. It is imperative to: plan security prior to installation or mobilization to the facility, plan securing master flow and drain valves, prevent unauthorized access to controls on oil pumps, secure disabled or out-of-service and loading/unloading connections of oil pipelines, and security lighting to prevent acts of vandalism. Lighting also can assist in the discovery of oil discharges.

Effluent Treatment Facilities

SPCC writer can chose from provided text as to what method of treatment or disposal of potentially contaminated water from a leak, spill, or transfer incident. None of these events are wanted to occur, or even expected to occur, yet spills, leaks, and transfer incidents happen all the same and a plan must be determined prior to mobilization to and delivery of any fuel cells.

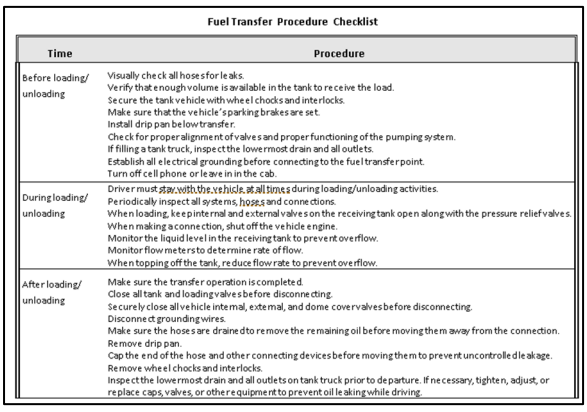




Loading/Unloading Procedures

All suppliers must meet the minimum requirements and regulations for loading/unloading. The Contractor has to train, or at least discuss the processes to make sure that the vendor understands the site layout, knows the procedure for entering the facility and unloading product, where to unload, and has the necessary equipment to respond to a discharge they may cause. The "Loading/Unloading" dropdown menu prompts the SPCC writer to choose and determine the facility location as well as including sources on the SPCC site map of Attachment B, required by Code. Again, if ADOT SPCC reviewers do not find the Site Map in Attachment B, or the Map is incomplete, the SPCC will be rejected at this point.

This section of the SPCC also includes the "**Fuel Transfer Procedure Checklist**". This is a generic checklist to prompt the SPCC writer to fully think about all aspects of complainant operations from before the operation begins through completion of operations.



Fuel Transfer Procedure Checklist

Time	Procedure
Before loading/ unloading	Visually check all hoses for leaks. Verify that enough volume is available in the tank to receive the load. Secure the tank vehicle with wheel chocks and interlocks. Make sure that the vehicle's parking brakes are set. Install drip pan below transfer. Check for proper alignment of valves and proper functioning of the pumping system. If filling a tank truck, inspect the lowermost drain and all outlets. Establish all electrical grounding before connecting to the fuel transfer point. Turn off cell phone or leave in in the cab.
During loading/ unloading	Driver must stay with the vehicle at all times during loading/unloading activities. Periodically inspect all systems, hoses and connections. When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. When making a connection, shut off the vehicle engine. Monitor the liquid level in the receiving tank to prevent overflow. Monitor flow meters to determine rate of flow. When topping off the tank, reduce flow rate to prevent overflow.
After loading/ unloading	Make sure the transfer operation is completed. Close all tank and loading valves before disconnecting. Securely close all vehicle internal, external, and dome cover valves before disconnecting. Disconnect grounding wires. Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Remove drip pan. Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage. Remove wheel chocks and interlocks. Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while driving.

Spill Prevention and Control

One of the greatest risks on projects or facilities is an oil discharge when equipment experiences a catastrophic failure or spills from simple fuel transfer. This section requires the SPCC writer to describe how they will minimize this type of failure. The Contractor must use sound engineering judgment when selecting and applying oil-filled equipment and perform mechanical work in pre-designated and ADOT approved areas. Fueling and fuel storage on site has the greatest potential for sills or leaks.

15. SPILL PREVENTION AND CONTROL

The greatest risk for an oil discharge occurs when equipment experiences a catastrophic failure. To minimize this type of failure, the Contractor will use sound engineering judgment when selecting and applying oil-filled equipment and perform mechanical work in pre-designated and ADOT approved areas. Fueling and fuel storage on site in generators, and fuel cells (55-gallon drums and greater) has the greatest potential for sills or leaks. Therefore, to minimize fuel discharge and cell failure, all fuel cells, tanks.

Mobile Fueling

Spill Countermeasures

This section contains a simple check-box feature with a dual purpose. Checking the box indicates which section the Contractor will take in the event of a spill to reduce impacts and control pollutants in the event of a spill. The second purpose is to be used in the field in such an event to ensure all steps have been taken in the required order. This documentation can be critical after a spill incident. Also notice the Attachments where forms will be placed are “highlighted” grey. This is an indicator

Mobile Fueling

Fueling off site (cells only)

Fueling for construction related vehicles (including transfer tanks and mobile refuelers) and equipment will take place off site of this project at a commercial location. Oil cells located at this facility are for operational equipment and an effective means of eliminating the discharge of spilled or leaked chemicals, including fuel, from the area where these activities will take place. The operator will select and designate an area to be used, subject to approval by the Engineer and minimize refueling of equipment throughout the site and using spill prevention containment methods, spill kits, and secondary containment wherever fueling occurs.

Fueling on site

Fueling for construction related vehicles and equipment will take place on this project location. Fueling of equipment or vehicles at the site will provide an effective means of eliminating the discharge of spilled or leaked chemicals, including fuel, from the area where these activities will take place. The operator will select and designate an area to be used, subject to approval by the Engineer and minimize mobile fueling of construction equipment throughout the site and use spill prevention containment methods wherever fueling occurs.

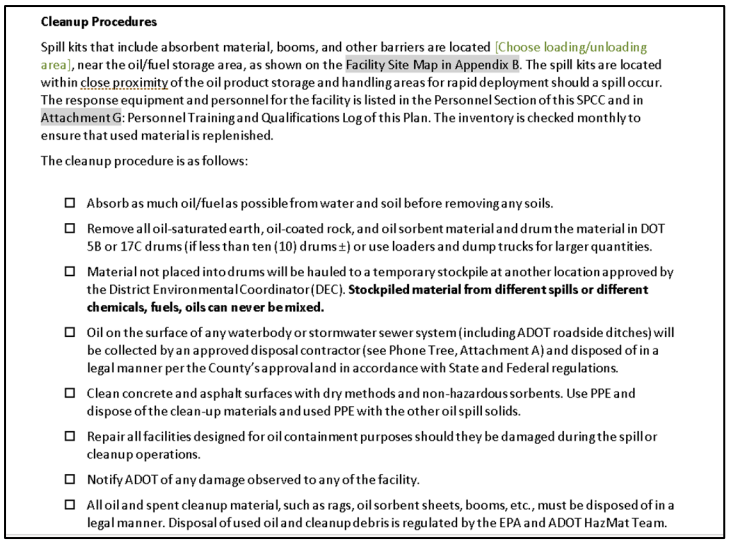
The above information will be reported to the ADOT RE with one hour of discovery. An estimate of the personnel and equipment needed to help contain the spill or to help in preliminary cleanup, and a decision of whether or not the local Fire Department will be communicated at this time. If an oil/fuel leak or spill has discharged off-site (beyond Right of Way (ROW)) or Temporary Construction Easements (TCEs), through a culvert, in a ditch, gone beyond an established perimeter or has already entered a waterway or is likely to do so (volume, weather conditions, etc.), call the local Fire Department for help (see Phone Tree Attachment A).

- ☐ Notify all employees on site, ADOT Engineer, and/or the local Fire Department.
- ☐ SPCC team employees will stop at the closest spill response location for personnel protective equipment (PPE), cleanup materials, and overpack products. See Facility Site Map Attachment B for locations of cleanup supplies.
- ☐ Terminate the source of flow of the spill/leak and as safe as possible, make sure the spill is totally contained. Plug the leak, close the valve, dig a trench, dike, etc. so long as it can be done safely to stop the spill from leaving the solar plant facility property or entering a waterway.
- ☐ The SPCC Team is responsible to keep the spill area secure until additional help arrives and keep unauthorized persons, vehicles, or equipment from entering the spill area while the necessary spill response activity occurs.
- ☐ De-energize any equipment within 100 feet and any equipment/cells that are spilling/leaking.
- ☐ Place oil/fuel absorbent materials into the spill area and beyond the last detectable location and take actions necessary to minimize or eliminate environmental damage. See Facility Site Map Attachment B for placement locations of containment materials.

to the SPCC writer and user of where documents need to be stored. No SPCC reviewer or personnel in the field should waste time looking for information that should be placed where all parties can easily locate documents.

Cleanup Procedures

Cleanup naturally follows spill countermeasures. This section contains the same simple check-box feature with a dual purpose, as well as a dropdown menu where the location of cleanup materials are housed/stored. The green text can be "copied and pasted" with a comma in between, allowing for as many spill cleanup material locations as necessary. If the SPCC writer chooses Station numbers (STA 00+00) for highway construction projects, a "RT" or "LF" should also be indicated for Right or Left stationing and clarity.

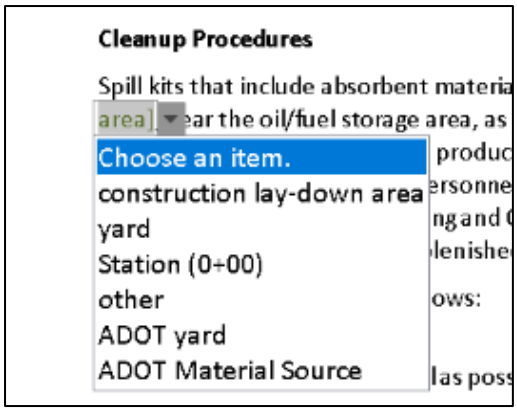


Cleanup Procedures

Spill kits that include absorbent material, booms, and other barriers are located [Choose loading/unloading area], near the oil/fuel storage area, as shown on the Facility Site Map in Appendix B. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur. The response equipment and personnel for the facility is listed in the Personnel Section of this SPCC and in Attachment G: Personnel Training and Qualifications Log of this Plan. The inventory is checked monthly to ensure that used material is replenished.

The cleanup procedure is as follows:

- ☐ Absorb as much oil/fuel as possible from water and soil before removing any soils.
- ☐ Remove all oil-saturated earth, oil-coated rock, and oil sorbent material and drum the material in DOT 5B or 17C drums (if less than ten (10) drums ±) or use loaders and dump trucks for larger quantities.
- ☐ Material not placed into drums will be hauled to a temporary stockpile at another location approved by the District Environmental Coordinator (DEC). **Stockpiled material from different spills or different chemicals, fuels, oils can never be mixed.**
- ☐ Oil on the surface of any waterbody or stormwater sewer system (including ADOT roadside ditches) will be collected by an approved disposal contractor (see Phone Tree, Attachment A) and disposed of in a legal manner per the County's approval and in accordance with State and Federal regulations.
- ☐ Clean concrete and asphalt surfaces with dry methods and non-hazardous sorbents. Use PPE and dispose of the clean-up materials and used PPE with the other oil spill solids.
- ☐ Repair all facilities designed for oil containment purposes should they be damaged during the spill or cleanup operations.
- ☐ Notify ADOT of any damage observed to any of the facility.
- ☐ All oil and spent cleanup material, such as rags, oil sorbent sheets, booms, etc., must be disposed of in a legal manner. Disposal of used oil and cleanup debris is regulated by the EPA and ADOT HazMat Team.



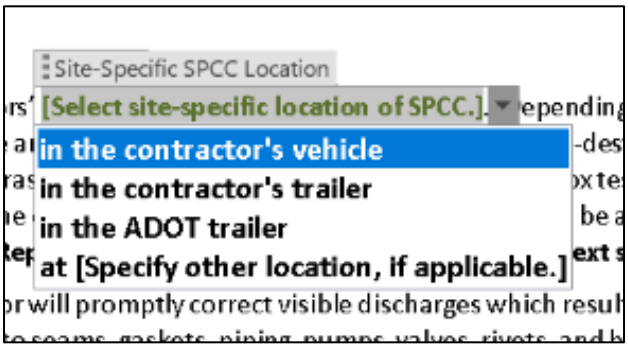
It is imperative that spill kits and associated tools (shovels, brooms, dust pans, PPEs, etc.) are inspected at the determined inspection frequency (see Section 17 Inspection below). These items frequently are used, not replaced, absent, or broken at the time of a real incident.

Inspection

Part of any SPCC is a routine inspection program. The inspection is intended to be a routine walk-around and include the container's supports and foundations. Every 14 calendar days the Operator will visually inspect the equipment, tanks, and secondary containment for signs of deterioration, leaks, rips, or breakage in secondary containment.

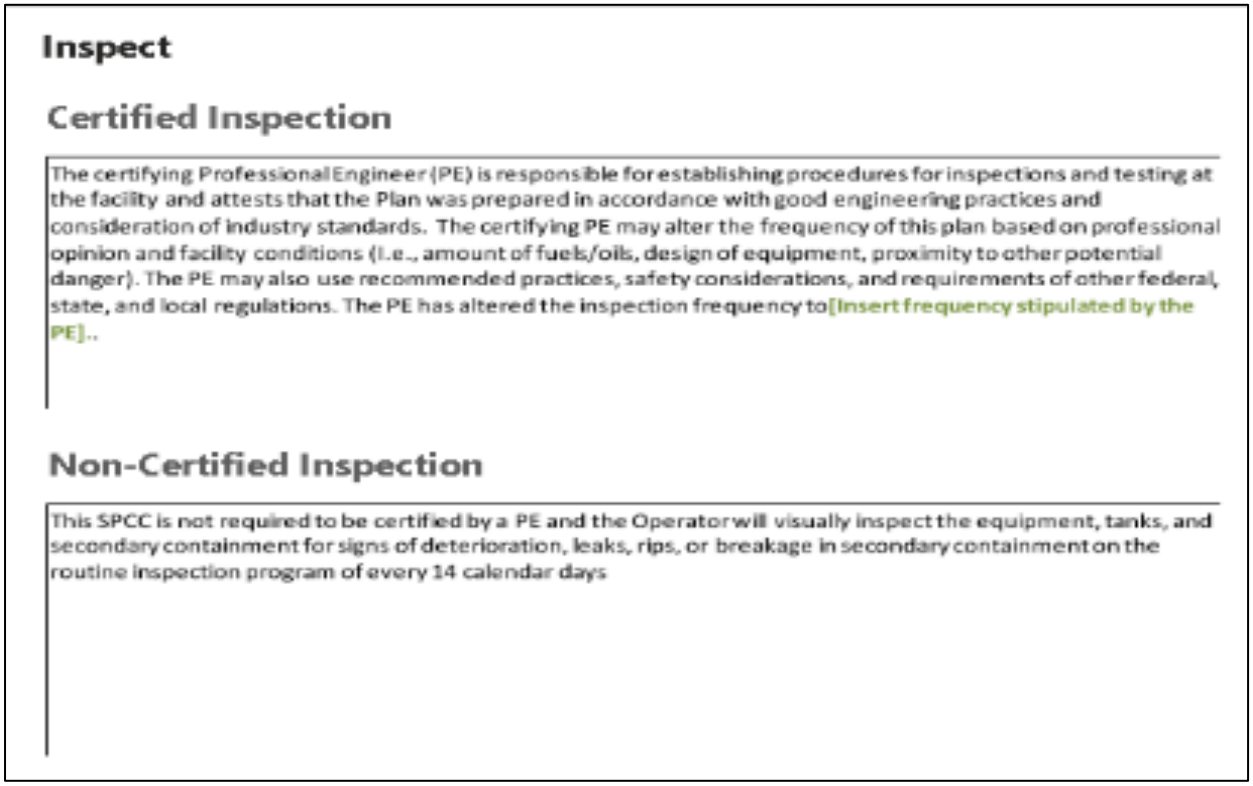
All inspection reports must be populated at the end of each inspection and stored in the SPCC in Attachment D. It is advised to keep all records, such as inspection reports, in chronological order. The SPCC Template has a dropdown menu whare SPCC location can be selected.

If the location of the SPCC changes during construction activity, this location should be amended.



The SPCC Team must submit all Inspection Reports to ADOT prior to the next scheduled inspection.

The SPCC is "Certified", the inspection frequency can be altered and in most cases the frequency increases. A dropdown menu has been proved for this alteration. Notice the additional green text allowing this frequency to be stated by the certifying P.E.



Inspect

Certified Inspection

The certifying Professional Engineer (PE) is responsible for establishing procedures for inspections and testing at the facility and attests that the Plan was prepared in accordance with good engineering practices and consideration of industry standards. The certifying PE may alter the frequency of this plan based on professional opinion and facility conditions (i.e., amount of fuels/oils, design of equipment, proximity to other potential danger). The PE may also use recommended practices, safety considerations, and requirements of other federal, state, and local regulations. The PE has altered the inspection frequency to [Insert frequency stipulated by the PE]..

Non-Certified Inspection

This SPCC is not required to be certified by a PE and the Operator will visually inspect the equipment, tanks, and secondary containment for signs of deterioration, leaks, rips, or breakage in secondary containment on the routine inspection program of every 14 calendar days

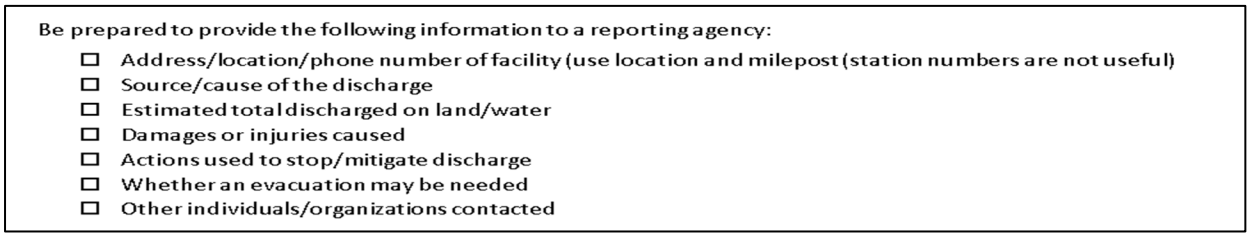
Reporting

All spills are Recordable!
Not all spills are Reportable.

A spill that will not discharge off the property, and in which immediate countermeasures and cleanup is carried out promptly, will not require outside notification. However, ADOT will be notified within 15 minutes of discovery. Spills that discharge off ADOT property, Temporary Construction Easement (TCE), or yard/source must be reported to State and Federal agencies and the National Response Center. Again, ADOT is notified upon discovery.

This section contains information pertaining to "Reporting" and procedures of how and when to report. This section also contains a simple check-box feature with a dual purpose. Checking the box indicates which action the Contractor will take in the event of a spill. The second purpose is to be used in the field in such an event to ensure all steps have been taken and in order.

All spills, deficiencies and corrective actions will be reported using the printed "Spill Release/Incident Form" in Attachment C.



Be prepared to provide the following information to a reporting agency:

- ☐ Address/location/phone number of facility (use location and milepost (station numbers are not useful)
- ☐ Source/cause of the discharge
- ☐ Estimated total discharged on land/water
- ☐ Damages or injuries caused
- ☐ Actions used to stop/mitigate discharge
- ☐ Whether an evacuation may be needed
- ☐ Other individuals/organizations contacted

Past Spill Experience

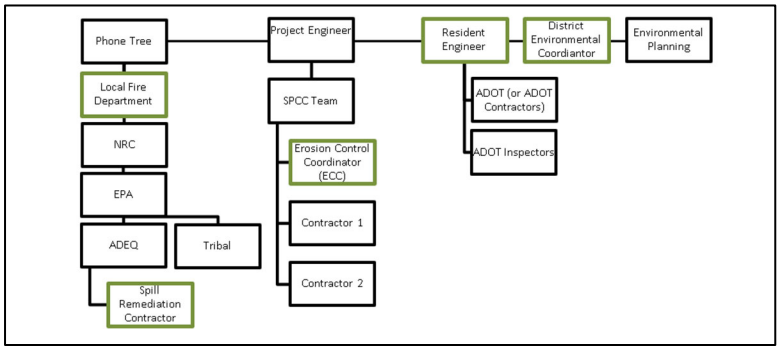
In most cases, this section will be marked as "None". In the event of a future spill at the Facility, the spill will be documented on the SPCC Incident Report Form Attachment C. If the facility did have past spills, the SPCC cannot be self-certified and must be stamped by a P.E.

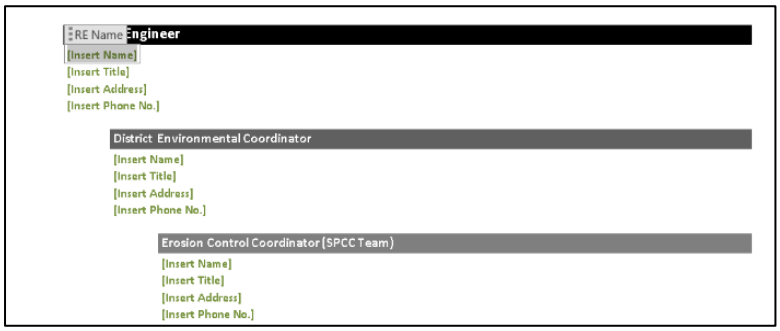
Review Dates

The Operator will review and evaluate this SPCC Plan at least once every five (5) years. It is unlikely that construction projects will last this long, and no updates will be necessary. However, the SPCC Plan will be amended within six (6) months if any of the check-box items occur. A licensed P.E. must certify any technical amendment to an SPCC plan that is "Certified".

- ☐ Replacement, reconstruction, or movement of oil containers that increase the chances of an oil spill reaching surface waters of Arizona or Waters of the U.S. (WOTUS).
- ☐ A new oil containment structure is installed.
- ☐ Construction or demolition that might alter secondary containment structures.
- ☐ A change in the design, construction, operation, or maintenance that affects potential the facility which may discharge to surface waters of Arizona or Waters of the U.S. (WOTUS).
- ☐ Revision of standard operation or maintenance procedures related to oil/fuel handling or storage.

SPCC Attachments





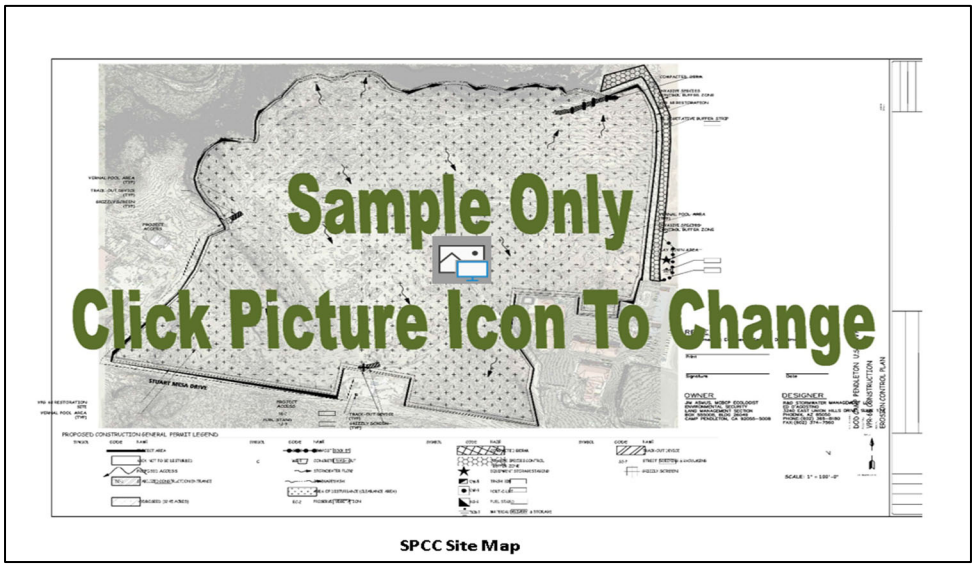
The **SPCC Attachments** section will still require the SPCC Writer to adjust and include information.

Attachment 1 Phone Tree has a place holder for the SPCC Writer to click on and update the contacts and order of contact.

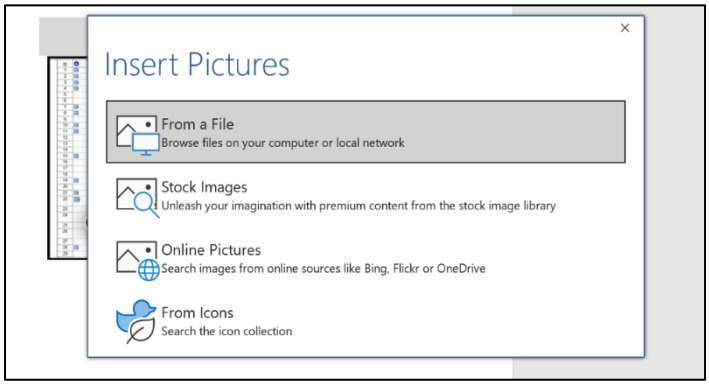
It is important to note that Microsoft Word does not allow an Adobe pdf to be linked in a Word document. However, a pdf may be created and then saved as a "jpeg" or "tiff" file. These formats will readily link into a Word document.

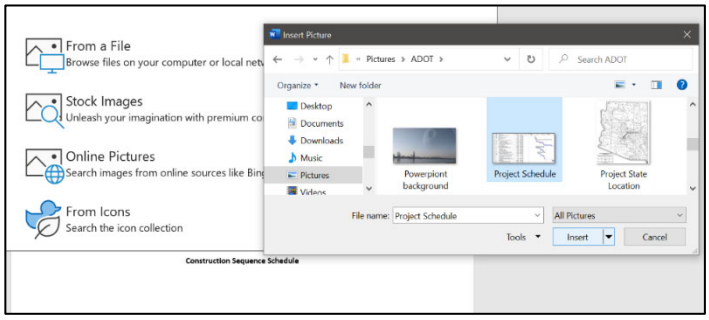
Hovering over green text in the hierarchy chart below the tree will allow the SPCC Writer to populate text as prompted.

Attachment 2 SPCC Site Map will require the SPCC Writer to insert an image. If the green "Sample Only" text still exists at review, the SPCC will be rejected.



SPCC Site Map





By clicking on the sample icon, Microsoft Word will open the **Insert Pictures** feature (see left).

The SPCC Writer will then choose to insert from a file on their computer, from an on-line picture, etc. The SPCC Writer can open a file and "link" the image (as shown).

Once the SPCC is printed, it is allowed for project schedules, site maps, and diagrams to be printed and placed in the identified Attachment location.

Note that Word will allow the user to insert tiff, or jpeg. PDFs cannot be inserted into Word documents. The user can save a PDF as a tiff or jpeg and then be able to insert the image.

Attachment C Spill Release Form will appear as included at the time of review. Will any spill or release toke place, the form will be populated like all other text in the SPCC Template by typing over the green prompt text. A minor difference with the Spill Release form is that it will allow the user to insert time as well as date.

Spill/Release Report

Project Name:	I-10	
Date of Release/Spill:	June 23, 2023	Start Time
Release/Spill Duration:	Start Time:	12:00 AM [Select applicable calendar day and then manu
	End Time:	
Operator's Name:	Company:	[Insert applicable company name.]
		[Insert company/organization.]
		[Insert street address.]

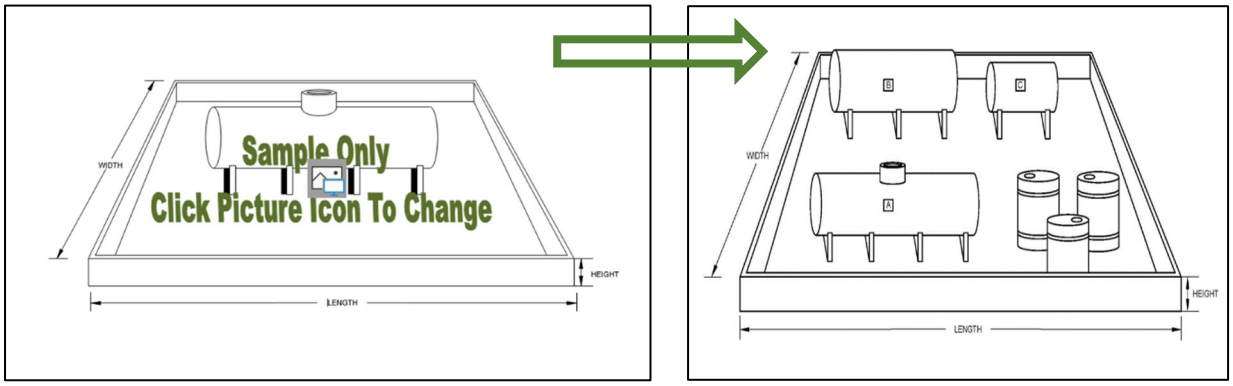
Attachment D SPCC Inspection Records contains a format for inspection of SPCC features. This is a simple form with "Yes" or "No" check boxes and an area for additional comments.

Inspection Checklist

This inspection record must be completed within 24-Hours of the is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks			
Tank surfaces show signs of leakage	☐	☑	
Tanks are damaged, rusted or deteriorated	☐	☑	
Bolts, rivets, or seams are damaged	☐	☑	
Tank supports are deteriorated or buckled	☑	☐	One tank support on cell 3 is bent. Recommend repair by next inspection (assumed to be on April 1, 2023).

Attachment E Diagram and Calculation of Secondary Containment Capacity will require the SPCC Writer to insert an image. If the green "Sample Only" text still exist at review, the SPCC will be rejected. SPCC Writers will follow the instruction form Attachment 2 SPCC Site Map above and insert an image. Additional area for calculations and/or text (example page 10 for Secondary Containment of these SPCC instructions) will be added in this location.



Company: [Insert company name.]
Responsible Party: [Insert name of individual who prepared this SPCC Plan.]
Address: [Insert street address.] [Insert city, state zip code.]
Phone: [Insert applicable phone no. (111-222-3333).]
E-Mail: [Insert hyperlinked e-mail address.]

Equipment Training

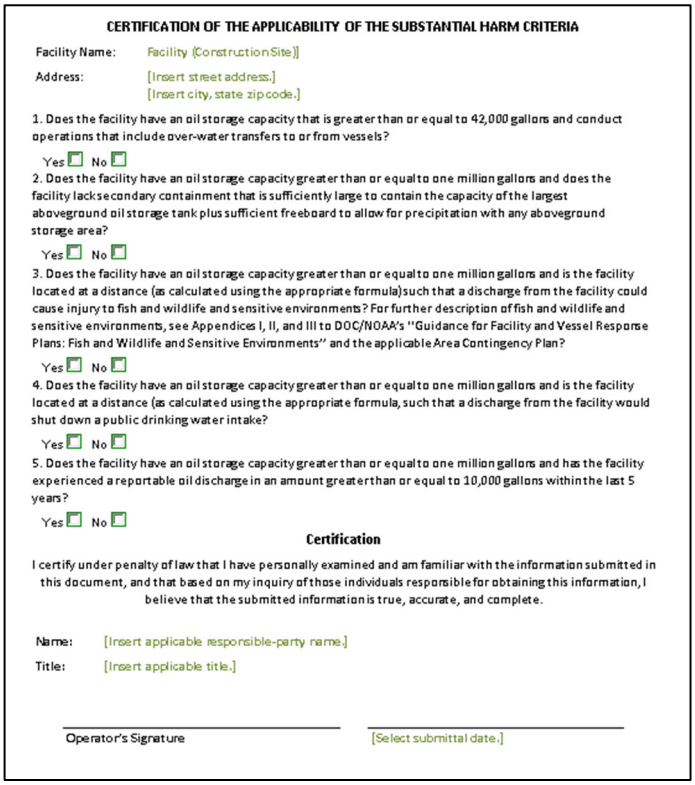
As a member of the SPCC Team, I have been trained to adequately operate, and inspect equipment listed here:

[Select "Yes" or "No." Do not leave blank.]	Container, integrity testing as an external visual inspection
[Select "Yes" or "No." Do not leave blank.]	Container integrity testing for Magnetic Flux Leakage (MFL)
[Select "Yes" or "No." Do not leave blank.]	Container integrity testing for ultrasonic thickness (UT) measurements
[Select "Yes" or "No." Do not leave blank.]	Container integrity testing for vacuum box testing

Attachment F Personnel and Training Qualifications Log will need to be populated for each individual of the listed SPCC Team. This is due to the fact that each member may have different training and experience.

Attachment G Certification of The Applicability of The Substantial Harm Criteria

Attachment G Certification of The Applicability of The Substantial Harm Criteria contains a questionnaire required by 40 CFR for SPCC responsible officials. An area for certification at the bottom should not be confused with a "*Certified SPCC*". This certification statement only means the user understands the regulations and that there are ramifications for non-compliance.



CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Facility Name: Facility (Construction Site)]

Address: [Insert street address.]
[Insert city, state zip code.]

1. Does the facility have an oil storage capacity that is greater than or equal to 42,000 gallons and conduct operations that include over-water transfers to or from vessels?

Yes ☐ No ☐

2. Does the facility have an oil storage capacity greater than or equal to one million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation with any aboveground storage area?

Yes ☐ No ☐

3. Does the facility have an oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" and the applicable Area Contingency Plan?

Yes ☐ No ☐

4. Does the facility have an oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula, such that a discharge from the facility would shut down a public drinking water intake?

Yes ☐ No ☐

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

Yes ☐ No ☐

Certification

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

Name: [Insert applicable responsible-party name.]

Title: [Insert applicable title.]

Operator's Signature _____ [Select submittal date.]

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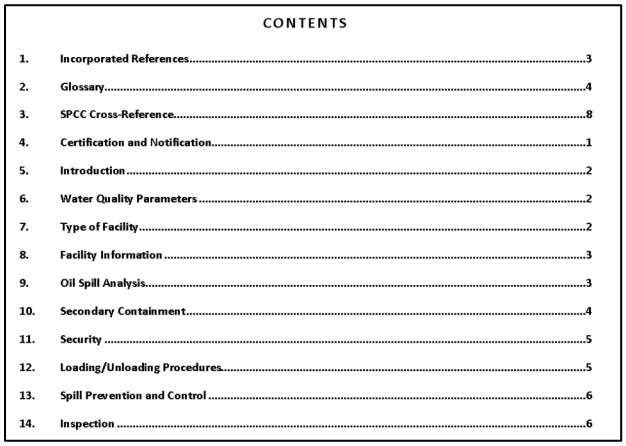
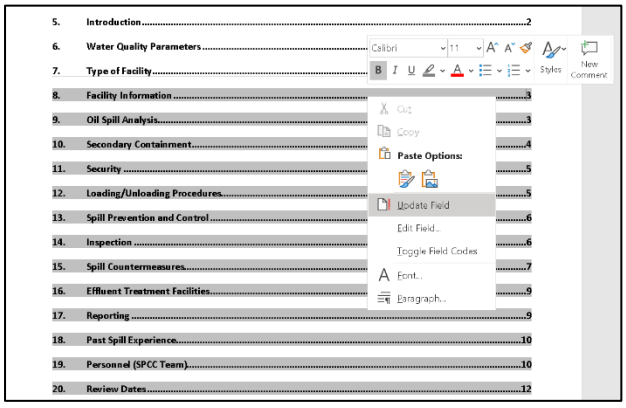


CONTENTS



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Upon completion of the SPCC Template by the SPCC Writer, or if changes were required by the SPCC Reviewer, the Table of Contents will need to be updated.

Right-click on any section of the Table of Contents and a menu will appear allowing the Writer or Reviewer to "Update Field."
It is suggested that the user select "Update Entire Table." This action will automatically repaginate the Table of Contents as each content line is linked to the headers. This removes the need to search for each header and manually change the page numbers.