Jardon
Engineering & Inspections LLC

Twin Enviro Services

Milner, Colorado

Spill Prevention, Control and Countermeasure Plan

Date:

May 11, 2021

Prepared By:

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Appendices

Tables & Figures

1 RAPID RESPONSE INFORMATION

In case of a spill at the facility, the following subsections provide quick access to emergency contacts as well as facility information for initial response.

Facility Address:

20650 Co Rd 205

Steamboat Springs, CO 80487

(970) 879-6985

1.1 Emergency Contact List

Contact	Name/ Location	Phone
Facility Contacts		
Compliance Officer	Tony Matt, Milner	970.326.8836
Compliance Manager	Ray Castle, Milner	970.756.2852
Local Contacts		
West Routt Fire Protection	Dispatcher	911
Steamboat Springs Fire Department	Dispatcher	911
UC Health, Yampa Valley Medical Center	1024 Central Park Dr, Steamboat Springs, CO 80487	911
State Contacts		
Colorado Department of Public Health and Environment	Environmental Release and Incident Reporting Line	(877) 518-5608
Colorado Highway Patrol	Dispatcher	(303) 239-4501

Contact	Name/ Location	Phone
Federal Contacts		
National Response Center (NRC)	Spill Response Hotline	(800)424-8802
United States Environmental Protection Agency	U.S. Environmental Protection Agency Region 8 (EPA) Environmental Hotline	(303) 293-1788 or (800) 227-8917

1.2 Driving Directions to the Facility:

From US 40 travelling west, travel west past Milner. Approximately ½ mile past Miler, turn left onto CR 205 and follow the dirt road to the facility gate. The larger bulk storage tanks are located at the facility shop, off the main road past the scale house, on the right.

2 INTRODUCTION AND SPCC PURPOSE

The Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977, authorized the establishment of procedures, methods, equipment, and other requirements for the prevention and/or containment of discharges of oil and hazardous substances from vessels and onshore and offshore facilities. In partial response to this authorization, the U.S. Environmental Protection Agency (USEPA) issued Oil Pollution Prevention Regulations for Non-Transportation Related Onshore and Offshore Facilities on December 11, 1973 (effective January 10, 1974). These regulations were published under Title 40 CFR Part 112 and specifically outlined requirements for the preparation of Spill Prevention, Control, and Countermeasure (SPCC) plans (herein referred to as the Plan or SPCC). SPCC Plans are designed to complement existing laws, regulations, rules, standards, policies, and procedures pertaining to safety standards, fire prevention, and pollution prevention rules. This SPCC Plan was prepared in accordance with the current SPCC rule and complies with the requirements of Title 40, Code of Federal Regulations, Part 112 (40 CFR Part 112).

On July 17, 2002, USEPA published modifications to the SPCC requirements in the Federal Register (Volume 67, No. 137, pages 47041-47152). In December 2006, USEPA signed a final rule to amend the SPCC rule at 40 CFR 112 to address a number of issues raised by its 2002 final rule, including those pertaining to facilities with smaller oil storage capacities, qualified oil-filled operational equipment, motive power containers, and mobile refuelers. This Plan has been prepared in accordance with these revised regulations.

This SPCC Plan has been prepared by Jardon Engineering & Inspections LLC for the Twin Enviro Services municipal landfill located in Milner, Colorado. This facility is currently operational and oil and other substance stored and utilized at the facility are directly in support

of landfill operations. The Twin municipal landfill is classified as an onshore non-production facility. Since the facility bulk storage exceeds 2,000 gallons for any one tank, and approximately 29,075 in aggregate, Twin cannot self-certify the entire plan. A professional engineer certification is provided in Section 2.2 to meet the requirements of the SPCC regulations.

The following sections of this Plan are presented in the sequence of the revised regulations, including §112.7 and §112.8, where the exact wording of the federal rule is provided in italics, followed by an explanation of how the requirements have been addressed.

2.1 Complimentary Plans

Twin has additional plans for facility operations that are complementary to this SPCC including:

- Spill Prevention and Response Procedures
- Storm Water Management Plan

Complimentary plans are available on file at the facility.

2.2 Approval & Certification

Management Approval

Management approval has been extended at a level with authority to commit the necessary resources to implement this Spill Prevention, Control, and Countermeasure (SPCC) Plan. Pursuant to §112.7(d) this is the written commitment of Twin Enviro Services, to provide the manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful to human health and the environment. This plan will be implemented as herein described.

Original

Marlin Mullet, CEO _____ 05/01/2021

Name, Title, and Signature Date

Date of full implementation: _____

Revision 1

CERTIFICATION

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

Signature

Darlin Mallet

Name

CEO

Title

Name, Title, and Signature Date

Date of full implementation: _____

Revision 2

Name, Title, and Signature Date

Date of full implementation: _____

Professional Engineer Certification

Pursuant to §112.3(d), and in accordance with Colorado requirements that the SPCC Plan be prepared by a PE licensed by the Colorado Division of Professions and Occupations, and by means of this SPCC certification, I attest that: (i) I am familiar with the requirements of the SPCC rule (40 Code of Federal Regulations [CFR] Part 112); (ii) I have personally has visited and examined the facility; (iii) the Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule; (iv) procedures for required inspections and testing have been established; and (v) the Plan is adequate for the facility, pending the implementation of the following by Twin:

- Integrity testing to ensure secondary containment is competent in the Convault take shall be completed within 1-year of this Plan and every 3 years thereafter while tank is in service.
- A certified inspector shall assess the condition of the 1,000-gallon concrete tank serving as secondary containment for the shop and necessary repairs shall be completed to ensure tank is not compromised. Documentation of inspection and repairs, if necessary, shall be maintained by the Facility.
- Containers used to store (temporary or permanent) oil, used oil, or oily rags, as well as spill materials and sorb shall be properly labelled with contents and labels replaced as they become illegible. Corrective actions shall be documented on the next monthly report.
- Move used antifreeze 250-gallon tote inside shop or provide other means of secondary containment.

Engineering Certification

Original

Rebecca Lindeman, P.E.

Registration No. 37279 State: Colorado

Date: 5/11/21

COLORADO REGISTERED PROFESSIONAL ENGINEER
REBECCA D. LINDEMAN
37279

Revision 1 Rebecca Lindeman, PE, Engineer _____

Name, Title, and Signature

Registration No. CO 37279 State CO

Date: July 1, 2021

Describe Revision and Identify Revision 1:

Added 4,000 gallon diesel fuel tank to tank island area. Table 1 updated to include new tank information.

Revision 2 _____

Name, Title, and Signature

Registration No._____ State _____

Date: _____

Describe Revision and Identify Revision 2:

3 GENERAL APPLICABILITY: §112.1

The Oil Pollution Prevention Regulations (40 CFR Part 112) require preparation of a Plan for facilities that have discharged, or could reasonably be expected to discharge, oil into or upon navigable waters of the United States or adjoining shorelines.

Specifically, §112.1(d)(2)(ii) requires a Plan to be developed for a facility where the aggregate storage capacity of oil in above ground storage tanks (ASTs) and equipment is greater than 1,320 gallons (including containers with thresholds of 55 gallons or greater). This does not include underground storage tanks (USTs) less than 42,000-gallons. The definition of oil includes: transformer oil, greases, synthetic oils, mineral oils, vegetable oil, oil refuse, petroleum, fuel oil, sludge, and oil mixed with wastes other than dredged spoil. Storage capacity is the shell capacity of the container. Storage containers include, but are not limited to, aboveground tanks, underground tanks, tanks in equipment, oil in equipment, 55-gallon drums, truck-mounted tanks, and trailer-mounted tanks.

Twin Enviro Services is required to develop, implement, and maintain a Plan for their facilities where they have an aggregate aboveground oil storage volume of 1,320 gallons or more in accordance with 40 CFR Part 112.

All facilities regulated under 40 CFR Part 112 must conduct an initial screening to determine whether they "could cause substantial harm to the environment by discharging oil" and, consequently, be required to develop a Facility Response Plan (FRP) under §112.20. The certified checklist stating that these requirements are not applicable to the facilities included in this Plan is included in Appendix A.

The purpose of this Plan is to identify sources of petroleum, oil, and lubricants stored in 55-gallon or greater containers, tanks, and oil-filled equipment, and to outline procedures to prevent the discharge of oil to navigable waters of the United States. The Plan additionally describes measures implemented by Twin to prevent oil discharges from occurring and aims to prepare the site and associated personnel to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

Additionally, this Plan is intended to:

- Prevent the occurrence of oil spills by using sound engineering and management controls,
- Prevent the discharge of oil into navigable waters of the U.S.,
- Prevent exposure of personnel and the community, and
- Prevent contamination of the environment.

In addition to fulfilling requirements of 40 CFR Part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

4 PLAN ADMINISTRATION: §112.3, §112.4, AND §112.5

4.1 Requirement to Prepare: §112.3

In accordance with §112.3(a), this Plan was completed and fully implemented as of the date noted by facility management in Section 2.2. The plan will be kept electronically and via hard copy at the Twin local offices. In addition, the Plan will be available to authorized representatives of local, state, or federal governing agencies for on-site review and a copy will be submitted if requested.

4.2 Amendment by Regional Administrator: §112.4

In accordance with §112.4(a), whenever more than 1,000 gallons of oil have been discharged in a single incident, or more than 42 gallons of oil have been discharged in each of two incidents over a 12-month period, Twin will submit the following information to the USEPA Regional Administrator (RA) within 60 days:

- §112.4(a)(1): Facility name,
- §112.4(a)(2): Name of designated person accountable for oil spill prevention at facility,
- §112.4(a)(3): Facility location,
- §112.4(a)(4): Maximum storage capacity and daily throughput at facility,
- §112.4(a)(5): Description of corrective action and countermeasures taken,
- §112.4(a)(6): Adequate description of the facility including maps and flow diagrams,
- §112.4(a)(7): Cause of the discharge(s), including an analysis of the failed system,
- §112.4(a)(8): Description of additional preventive measures taken or contemplated to prevent recurrence, and
- §112.4(a)(9): Other pertinent information.

In accordance with §112.4(c), copies of the incident report will also be forwarded to the Colorado Department of Public Health and Environment (CDPHE), as appropriate. Should the RA subsequently propose (either by certified mail or personal delivery) that this Plan be amended, in accordance with §112.4(e) Twin will:

- Submit arguments and supporting information in response to the proposed amendments, or
- Amend this Plan within 30 days and implement the amended Plan within 6 months.

Amendments will be recorded in Section 2 (describing changes implemented) and signed to document their implementation, as applicable.

Facility reporting procedures and a sample Spill Documentation Form has been included as Appendix B to this Plan.

4.3 Plan Amendment by Owner/Operator: §112.5

In accordance with §112.5(a), when there is a change in facility design, construction, operation, or maintenance that materially affects its potential for a discharge, Twin will amend this Plan within 6 months of the change and implement the amended Plan within 6 months of its completion.

In accordance with §112.5(b), the Plan must be reviewed at least every 5 years from the date the facility became subject to the SPCC rule and the completion of the review and evaluation must be documented. As required by §112.5(c), technical changes made to the Plan shall be certified by a Professional Engineer.

Mr. Kevin Mccune is the designated person accountable for oil spill prevention at the facilities included in this Plan.

Amendments will be recorded in Section 2 (describing changes implemented) and signed to document their implementation in Section 2, as applicable.

4.4 Plan General Requirements: §112.7

> *If you are the owner or operator of a facility subject to this Part you must prepare a Plan in accordance with good engineering practices. The Plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. You must prepare the Plan in writing. If you do not follow the sequence specified in this section for the Plan, you must prepare an equivalent Plan acceptable to the Regional Administrator that meets all of the applicable requirements listed in this part, and you must supplement it with a section cross-referencing the location of requirements listed in this part and the equivalent requirements in the other prevention plan. If the Plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, you must discuss these items in separate paragraphs, and must explain separately the details of installation and operational start-up.*

This Plan presents facility-specific details associated with the general requirements for Plans outlined in §112.7. As previously indicated, this Plan has been prepared in accordance with good engineering practice, with management approval at a level with authority to commit the necessary resources for full implementation, and in the sequence of the rule.

4.5 General Facility Information

Name of facility: Twin Enviro Services

Type of facility: Municipal Landfill

Location of facility: 20650 Country Road 205

Steamboat Springs, CO 80487

Name and address of owner:

Name: Les Liman

Address: PO Box 774362, Steamboat Springs, CO. 80477

Designated person accountable for oil spill prevention at facility:

Name and Title: Kevin Mccune

4.6 General Facility Description

The Milner Landfill is a phased solid waste disposal facility located approximately one mile southwest of Milner, in Routt County, Colorado. All tanks at this facility are above-ground storage tanks (ASTs), and are located either inside of or near to the maintenance shop. All activities using oil products are in support of the municipal landfill facility.

4.7 Plan Conformance and Deviations: §112.7(a)(1) and (2)

(a)(1)Include a discussion of your facility's conformance with the requirements listed in this part. (a)(2)Comply with all applicable requirements listed in this part. Your Plan may deviate from the requirements in paragraphs (g),(h)(2)and (3),and (i) of this section and the requirements in subparts B and C of this part, except the secondary containment requirements in paragraphs (c)and (h)(1)of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c), where applicable to a specific facility, if you provide equivalent environmental protection by some other means of spill prevention, control, or countermeasure. Where your Plan does not conform to the applicable requirements in paragraphs (g), (h)(2) and (3), and (i) of this section, or the requirements of subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c), you must state the reasons for nonconformance in your Plan and describe in detail alternate methods and how you will achieve equivalent environmental protection. If the Regional Administrator determines that the measures described in your Plan do not provide equivalent environmental protection, he may require that you amend your Plan, following the procedures in §112.4(d) and (e).

This Plan conforms with the requirements of §112.7. Any deviations or equivalent environmental protection measures are described herein.

4.8 Facility Layout: §112.7(a)(3)

> *(a)(3) Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each container. The facility diagram must include completely buried tanks that are otherwise exempted from the requirements of this part under §112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes.*

The tanks, containers and equipment storing petroleum, oil, and lubricants applicable to this Plan are listed in Table 1 and shown on Figure 2. Mobile equipment is listed on Table 2.

4.9 Oil Storage Capacity: §112.7(a)(3)(i)

> *(a)(3) You must also address in your Plan: (i) The type of oil in each container and its storage capacity;*

Diesel fuel, gasoline fuel, hydraulic fluids, waste oil, and engine oil, and oil-containing water are stored and handled at the facility. A summary of the containers, substances, and substance quantities is provided in Tables 1 and 2, attached.

4.10 Discharge Prevention Measures: §112.7(a)(3)(ii)

> *(a)(3) You must also address in your Plan: (ii) Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);*

Discharge prevention measures that are currently used by Twin include the following:

- Written procedures for the handling of oil and oil products that include fuel transfer operations;
- Discharge prevention training for applicable operations and maintenance personnel;
- Routine visual inspections of aboveground tanks and containers;
- Regularly scheduled formal inspections and integrity testing of aboveground tanks; and,
- Maintenance and repair program for oil or oil product storage tanks, containers, and equipment.

4.11 Discharge or Drainage Controls: §112.7(a)(3)(iii)

> *(a)(3) You must also address in your Plan: (iii) Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;*

The Twin landfill facility relies on secondary containment features as well as best management practices for the control of unanticipated discharges. These containment controls include the following:

- Double-walled tanks,
- Secondary containment pallets,
- Building floor drains that discharge to an on-site vault,
- Tanks inside metal structures that serve as secondary containment,
- Spill response procedures, and
- Spill response equipment (absorbent materials, booms, shovels, etc.) that can be quickly deployed once a spill or leak is detected.

Table 1 list the containment method (e.g., double-walled tanks or spill pallets) for each AST.

4.12 Countermeasures for Discharge Discovery, Response, and Cleanup: §112.7(a)(3)(iv)

> *(a)(3) You must also address in your Plan: (iv) Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);*

The facility has adequately trained personnel and equipment to contain and clean up minor to moderate volumes of spilled materials. Oil and fuel spill response is the responsibility of onsite personnel.

Site personnel working in the shop as well as field management staff are specifically trained to respond, contain, and clean up minor volumes of spilled materials. On-site equipment and materials include, but are not limited to, heavy equipment, spill kits, shovels, dirt, sand, and absorbent materials that may be used to dike, contain, and remove minor to moderate spills/releases. Spill kits and sorb material are available in the Shop as well as within select pickup trucks, which are readily available at the facility to mobilize to support spill response outside of the shop. Larger spills could be controlled through rapid construction or deployment of temporary structures such as booms or earthen berms.

Appendix B contains spill response actions and a sample release documentation form.

4.13 Recovered Materials Disposal: §112.7(a)(3)(v)

> *(a)(3) You must also address in your Plan: (v) Methods of disposal of recovered materials in accordance with applicable legal requirements;*

Materials recovered during a spill event will be appropriately containerized. Soils and other solids will be placed in 55-gallon drums or roll-off containers, as warranted. Free liquids will be placed in 55-gallon drums or will be collected in a tank truck using industrial power vacuuming. Recovered materials will be labeled, characterized, and disposed of locally within the landfill, disposed of offsite if deemed a material not accepted by the facility, or recycled in accordance with applicable federal, state, and local regulations.

4.14 Contact List and Notification Phone Numbers: §112.7(a)(3)(vi)

> *(a)(3) You must also address in your Plan: (vi)Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).*

The contact list for spill response activities is provided in Section 1.1, above.

4.15 Reporting and Notification Procedures: §112.7(a)(4)

> *(a)(4)Unless you have submitted a response plan under §112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and, the names of individuals and/or organizations who have also been contacted.*

In the event of a spill of a reportable quantity of oil, hazardous, or toxic substance, immediate telephone notification of the following environmental agencies is mandatory:

- National Spill Response Center for Oil and Hazardous Substances
- Colorado Department of Public Health and Environment
- City of Steamboat Springs, Fire Department and Police Departments (911)

Telephone numbers for these agencies are provided in Section 1.1, above

Where appropriate, you should be ready to report the following:

- Your name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or spill
- Types of material(s) released or spilled
- Quantity of materials released or spilled
- Danger or threat posed by the release or spill
- Number and types of injuries (if any)
- Weather conditions at the incident location

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

Twin must provide telephone notification and send written notification describing the release and associated emergency response as described below.

- Releases to Surface or Storm Water – A release of any chemical, oil, petroleum product, sewage, etc., **which may enter waters of the State of Colorado** (which include surface water, ground water and dry gullies or storm sewers leading to surface water) must be reported to CDPHE immediately (25-8-601 CRS). Written notification to CDPHE must follow within five (5) days (5 CCR 1002-61, Section 61.8(5)(d)). Any accidental discharge to the sanitary sewer system must be reported immediately to the local sewer authority and the affected wastewater treatment plant.

- Releases of petroleum products and certain hazardous substances listed under the Federal Clean Water Act (40 CFR Part 116) must be reported to the National Response Center as well as to CDPHE as required under the Clean Water Act and the Oil Pollution Act.

- Releases from Storage Tanks – Petroleum releases of 25 gallons or more (or that cause a sheen on nearby surface waters) from regulated aboveground and underground fuel storage tanks must be reported to the State Oil Inspector within 24 hours (after-hours contact CDPHE Emergency Spill Reporting Line). This includes spills from fuel pumps. Spills or releases of hazardous substances from regulated storage tanks in excess of the reportable quantity referenced above (40 CFR Part 302.6) must be reported to the National Response Center and the local fire authority immediately and to the State Oil Inspector within 24 hours. (8-20.5-208 CRS and 7 CCR 1101-14 Article 4). Owners/operators of regulated storage tanks must contain and immediately clean up a spill or overfill of less than 25 gallons of petroleum and a spill or overfill of a hazardous substance that is less than the reportable quantity. If cleanup cannot be accomplished within 24 hours, the State Inspector of Oils must be notified immediately (7 CCR 1101-14 Article 4-4). CDPHE should also be notified in the case of hazardous substance releases because cleanup activities may be covered by state solid or hazardous waste requirements (6 CCR 1007-2, 6 CCR 1007-3). Any release that has or may impact waters of the state (which include surface water, ground water and dry gullies or storm sewers leading to surface water), no matter how small, must be reported immediately to CDPHE (25-8-601 CRS).

Telephone numbers for relevant agencies are provided in Section 1.1, above.

4.16 Spill Response Procedures: §112.7(a)(4)

(a)(5)Unless you have submitted a response plan under §112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.

Facility personnel will respond to all uncontained petroleum, oil, and lubricant (POL) releases, regardless of whether such releases have the potential to reach a waterway. Response actions will be in accordance with Twin's existing written procedures. This SPCC plan is a companion document to the existing spill response and stormwater procedures. Appendix B contains general response and reporting procedures, Section 1.1 provides emergency contacts.

Adequate spill response equipment is available for use at or in close proximity to all regulated POL storage locations. In general, spill absorbent pads, gloves, shovels, and floor absorbent (vermiculite) are available for use as needed. Empty containers (i.e., 55-gallon drums) and plastic bags are also available for use as needed. Select facility pickup trucks also contain spill kits with PEE and sorb materials, readily available to support spill response at areas outside the Shop.

The facility has two options for immediate management of a POL release. When a release is confined to a small area, spill response supplies may be used to contain the release and recover the spilled materials. This method would be sufficient to address spills of containers, drums and materials stored in mobile tanks or equipment. The use of spill response supplies to contain and recover released materials is also suitable for spills or releases from pumps connected to ASTs.

Larger releases from ASTs would be contained by use of heavy equipment on-site for spill control (e.g., construction of earthen containment berms) as necessary to contain larger releases from reaching a manmade storm water pond or offsite waterway. Any releases would then be subsequently reported, recovered and managed.

Reportable spills should be recorded and reported in accordance with Section 4.15. Twin shall maintain a log of all spills at the site. The spill history should include the following information:

- Date and time of spill
- Location, type and amount of POL released
- Waterway affected
- Cause of release
- Cleanup actions, and
- Actions taken to prevent recurrence.

A review of the previous 5-year spill documentation indicates no spills above reporting limits. A form for recording and reporting of spills that may occur in the future and a summary of measures to be taken in the event of a spill is provided in Appendix B.

4.17 Discharge Analysis: §112.7(b)

> *(b)Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.*

Predictions of the direction of a release from potential sources can be made by evaluating the local topography. The nearest drainage is Milner Spring Creek, which is a tributary to the Yampa River. While there are manmade storm water collection basins that would intercept any spill from the facility, this assessment assumes that a spill occurs during a rain event or another time where the basin would be at capacity. Additionally, there is some evidence of subsurface connection of the storm water basin to Milner Spring Creek. Milner Spiring Creek is approximately 840 feet from the closest potential source (fuel island), and it drains approximately 2,280 feet prior to discharge to the Yampa River. The stormwater basin is approximately 275 feet (map distance not topographical distance) from the fuel island, which is the closest potential source.

Relative rate of flow total quantity of substances that could be discharged from the facility storage areas are presented in Tables 1 and 2. Please note that on Table 1, the potential discharge rate was assumed to be 100% of the largest container located in each storage area to represent catastrophic failure or other instantaneous release of a single tank.

Based on the materials stored and used at the facility, spill mitigation procedures and response guidelines address the following scenarios:

- Drum/pail puncture/leak;
- Failure of equipment hoses;
- Tank overfill/failure; and/or
- Explosion and/or fire.

The following scenarios were evaluated for discharge potential and substance amount:

Discharge Scenario	Material	Planning Volumes
Small	Oil	5 gallons
Medium	Diesel	2,000 gallons

Large	Oily Water	20,000 gallons

The following operations have been evaluated considering spill history, chain reaction failure probability, and proximity to property limits in relation to flow direction in selecting small, medium, and large volume discharge scenarios:

Operation	Discharge Scenario
Spill or release of oil from 55-gallon drum at a shop during use.	Small
Hose failure in mobile equipment	Small
Loading/Unloading of Tanker Trucks/Fuel Trucks	Medium
Oily-water tank rupture and berm breach or overtop	Large/Worst Case

The chance of catastrophic failure of the storage tanks is relatively remote. Stored materials are diesel, gasoline, oily-water, and waste oil all of which are noncorrosive materials. Failure of the oil-water tank would also require the bermed area to breach or already be full of water to allow for a release. While unlikely, this scenario was analyzed.

A discharge during loading or unloading of tanker trucks/fuel trucks is determined to be more likely to occur, however in a fully-manned operation. A spill from a 55-gallon drum during use or due to a hose failure from mobile equipment during use seems most likely to occur, resulting in a small spill that should be easily managed.

4.18 Spill Containment: §112.7(c)

(c)Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b).The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following prevention systems or its equivalent:

(1)For onshore facilities: (i)Dikes, berms, or retaining walls sufficiently impervious to contain oil; (ii)Curbing; (iii)Culverting, gutters, or other drainage systems; (iv)Weirs, booms, or other barriers; (v)Spill diversion ponds; (vi)Retention ponds; or (vii)Absorbent materials.

(2)For offshore facilities: (i) Curbing or drip pans; or (ii) Sumps and collection systems.

The site storage tanks are listed in Table 1. Table 1 also lists the type of containment for each tank. Table 2 contains similar information for SPCC-regulated mobile equipment. These are grouped below for discussion of containment existing and adequacy for meeting the intent of this rule.

Fuel Island

The fuel island is comprised of four above ground storage tanks. Each of the metal ASTs sits within an open-top metal secondary containment box, with volume adequate to contain 100% of the tank volume. Each tank is also equipped with a level gauge as well as sample port for use of a dip stick to manually measure level of liquid within the tank. Each tank has accessory fuel hoses that sit within or sometimes exterior of the secondary containment. These hoses are controlled by a valve at the tank, are only used during filling or fueling operations, and if severed when not in use, would not siphon the tank due to the control valve.

Fueling and filling operations are always manned. Filling operations are completed by a 3rd party who transports fuel from offsite to replenish the onsite tanks. The 3rd party vendor fuel vehicles are equipped with spill pans and sorbs, and filling operations are documented by onsite staff. Tank volume is verified either via gauge or dip stick prior to initiation of filling. The 3rd party vendor shall stay with the filling operation for its duration to ensure connections are not leaking and that overfilling does not occur.

Fueling operations are conducted by onsite staff appropriately task trained and trained on this SPCC. Fueling operations shall be continuously manned to avoid overfilling. The fuel island is in a highly visible portion of the site where activities are ongoing during the workdays. Spills would be ready observed and managed.

Bermed Tank

The 20,000-gallon oily-water tanks sit within a below-grade containment structure capable of holding well over 100% of the volume of one tank. The containment is lined and constructed of a combination compacted site soils (low permeability) and fly ash. Filling operations occur within the limits of the containment and are manned to manage any leaks or spills that may occur during liquids transfer. Should a significant spill occur within the containment, soil would need to be removed and sampled to confirm the limits of the oily water were fully removed as part of spill management. These tanks are located near the shop building and visible during the workday.

Shop

The entire shop building floor is sloped to the centra drain system, which gravity drains to the concrete vault located outside of the shop. The vault provides secondary containment for the shop regulated materials and is three times the volume of the largest container within the shop, providing sufficient containment volume. Additionally, some drums and pails are also stored on containment pallets within the shop. Water is infrequently used in the shop;

therefore, the containment vault is normally dry. Staff are generally in the shop during the workday such that any spills or leaks would be readily observed and managed.

Mobile Equipment

Oil-filled mobile equipment is generally parked within the limits of the landfill. Heavy equipment does operate over the entire site. Containment outside of working hours is provided by parking within the landfill limits, making any spill cleanup easy to mitigate without potential for offsite flow paths. Equipment is inspected at the start of each day and/or shift and any leaks are noted, managed, and repaired.

4.19 Spill Containment Practicability: §112.7(d)

Twin intends to provide practical spill containment as noted in Section 4.14 above. In addition, the Twin facility adheres to the written procedures identifying measures to be taken in the event of a spill as described in Section 4.12, Appendix B and other facility documents. Twin's written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Section 2.2 of this SPCC.

4.20 Inspections, Tests, and Records: §112.7(e)

> *(e)Inspections, tests, and records. Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.*

ASTs, containers, and mobile fueling tanks and mobile equipment are visually inspected routinely by the Operator as a matter of daily facility operations including fueling of mobile equipment, use of mobile equipment, and daily operations within the Shop. Additionally, tanks are formally inspected as part of the quarterly stormwater monitoring inspection. Any deficiencies are reported to a supervisor or the Compliance Manager and subsequently corrected. Quarterly inspections document items for corrective action that cannot otherwise be immediately rectified.

Inspections are documented by using the SPCC Inspection Record provided in Appendix C, or a similar form.

Maintenance records are kept of all integrity testing as well as other major work on the tanks and equipment for a period of not less than 3 years at the facility. No major repairs nor 3rd part testing has been completed within the past 3 years at the Facility.

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

> *(f)Personnel, training, and discharge prevention procedures.*
>
> *(1)At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility Plan.*
>
> *(2)Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.*
>
> *(3)Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b)or failures, malfunctioning components, and any recently developed precautionary measures.*

The personnel operating mobile heavy equipment and those working in the shop are instructed on job responsibilities and duties. Oil handling personnel are trained at least annually in the operation and maintenance of equipment to prevent discharges of oil and facility procedures for spill response and reporting. Training on this SPCC is included as part of the annual Stormwater training.

In New hires that work in areas covered by the SPCC Plan are required to have spill prevention training, which may be part of the annual training or part of on-the-job training based on work duties.

An Employee Training Documentation Form is in Appendix E to document initial and annual training. Training records will be maintained at the site for 3 years.

4.22 Security: §112.7(g)

> *(g)Security (excluding oil production facilities).*
>
> *(1)Fully fence each facility handling, processing, or storing oil, and lock and/or guard entrance gates when the facility is not in production or is unattended.*
>
> *(2)Ensure that the master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or non-standby status.*
>
> *(3)Lock the starter control on each oil pump in the "off" position and locate it at a site accessible only to authorized personnel when the pump is in a non-operating or non-standby status.*
>
> *(4)Securely cap or blank-flange the loading/unloading connections of oil pipelines or facility piping when not in service or when in standby service for an extended time. This security practice also applies to piping that is emptied of liquid content either by draining or by inert gas pressure.*
>
> *(5)Provide facility lighting commensurate with the type and location of the facility that will assist in the: (i)Discovery of discharges occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.); and (ii)Prevention of discharges occurring through acts of vandalism.*

Security is provided at the facility during operational hours via a scale house attendant. ASTs are not readily accessible to the general public accessing the landfill due to their location

outside of the working face and usual publicly accessible areas. The facility is currently operational 6-days a week. Outside of working hours the facility maintains a 6-foot high, 2x4 welded wire mesh fence surrounding the landfill facility to deter unauthorized access.

(h)Facility tank car and tank truck loading/unloading rack (excluding offshore facilities).

(1)Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.

(2)Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.

(3)Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

As indicated in Section 4.18 above, Fueling and filling operations are always manned, and each tank within the fuel island has secondary containment adequate to contain 100% of the tank volume. The oily-water tanks are contained within a below-grade structure capable of holding over 100% of the volume of one tank. Liquids transfer is a manned operation.

All filling and transfer trucks, as well as onsite equipment being refueled shall have wheel chocks placed prior to the start of filling, fueling or transfer operations. These operations will always be manned and documented. Spill supplies will be readily available at the site of the filling, fueling and/or transfer and shall include at a minimum sorb materials, a shovel, gloves, safety goggles or shield, and a spill pan. Levels of tanks shall be monitored to prevent overflow. Any spills during operations, including from fittings or valves, shall be managed, and the cause repaired as soon as practical. Wheel chocks shall be removed only when the fill/fuel/transfer is complete, and lines have been disconnected and replaced. This will aid in preventing accidental “drive-off” of the involved equipment. Staff shall be trained in location and operation of shut of valves associated with filling, fueling and liquids transfer operations.

All 3rd party vendors providing fuel to the facility are required to meet the minimum requirements and regulations established by the Colorado Department of Transportation. All vendors are required to inspect their truck, outlets, and drains prior to filling and again prior to departure from the site. Fuel vendors are also required to carry appropriate spill response equipment on-board fueling trucks. If a leak or spill occurred during the loading process, activities would be stopped immediately, and appropriate response actions taken.

4.23 Brittle Fracture Analysis: §112.7(i)

> *(i)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 failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.*

There are no field-constructed aboveground containers at the facility that are used to store oil or oil products; therefore, the requirements of §112.7(i) do not apply.

> *(j)In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.*

Section 5 of this Plan provides further detailed discussions of conformance with the applicable federal and state requirements and other effective discharge prevention used at the facility. Complimentary facility plans also address discharge prevention procedures meeting Local and State requirements.

4.24 Qualified Oil-filled Operational Equipment: §112.7(k)

k) Qualified Oil-filled Operational Equipment.
The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section.

(1) Qualification Criteria-Reportable Discharge History: The owner or operator of a facility that has had no single discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the Plan certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war or terrorism); and

(2) Alternative Requirements to General Secondary Containment. If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:
(i) Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and
(ii) Unless you have submitted a response plan under §112.20, provide in your Plan the following:
(A) An oil spill contingency plan following the provisions of part 109 of this chapter.
(B) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

The SPCC regulated oil-filled equipment located at this facility has been identified in Table 2. The general non-working storage location associated with each piece of SPCC-regulated equipment are also identified in Table 2. Heavy equipment is mobile and is not self-equipped with secondary containment. A mobile fueling vehicle also qualifies as oil-filled operational equipment due to the onboard fueling tank. During use of mobile operational equipment, spill response kits will be made available to respond to a minor spill from this equipment. When not in use, heavy equipment is stored either within the landfill waste boundaries, or outside of the shop and are visible by general staff. Equipment is also visually inspected at the start of each shift and workday, providing an additional means of identifying and managing any leaks at that time. The mobile fueling truck is generally parked outside the shop near the fuel island when not in use and is visible to general staff working in the area. Filling, fueling and liquids transfer operations will follow procedures outlined in previous sections of this SPCC, and the procedures include inspections of mobile equipment as well as regular inspections.

Based on visibility, inspections, and storage locations, mobile equipment leaks are considered low risk and easily managed using the site spill response plan and equipment and manpower committed to spill response and recovery, thereby meeting the intent of this section of the Rule.

5 REQUIREMENTS FOR ONSHORE FACILITIES (EXCLUDING PRODUCTION FACILITIES): §112.8

This SPCC Plan conforms with, and does not deviate from, the requirements of 40 CFR §112.7. This Section presents facility-specific details associated with the requirements for onshore non-production facilities outlined in §112.8.

5.1 Facility Drainage: §112.8(b)

> *(b)(1)Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.*
> *(b)(2)Use valves of manual, open-and- closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment facility, you must inspect and may drain uncontaminated retained stormwater, as provided in paragraphs (c)(3)(ii),(iii),and (iv)of this section.*

Four of the ASTs are located outdoors where the secondary containment is exposed to precipitation events. These containment areas are inspected regularly following precipitation events and water is removed as necessary using a vacuum truck and the contents are subsequently taken to the wastewater treatment plant for management. While vacuum truck methods are typical, the facility may also drain the water locally if a visual assessment for evidence of a sheen or odor related to a leak within the tank is conducted. If the visual assessment shows no evidence of a leak, the water may be directly released from the containment. If evidence of a leak or spill exists, the water within the containment should be containerized and removed for offsite treatment or disposal. Additionally, staff should investigate the source of the sheen/odor and ensure the tank itself is not leaking prior to continued use. The tank should be taken out of service if the integrity is compromised or suspected to be compromised. Accumulated water should be evaluated and managed following significant rain events and at least monthly to maintain appropriate spill containment volume for these tanks.

The 20,000 oily contaminated water sits within a large lined earthen bermed area. The bermed area does not have a drain valve. Water that might accumulate within the bermed area typically evaporates prior to requiring management. In the case of water or snow management, facility personal assess the standing precipitation for evidence of a spill including a sheen or strong odor. If there is no evidence of oil-type fluids, the water may be pumped directly from the bermed area, and snow may be plowed out, as necessary, taking care to not damage the containment area nor the tanks. If a sheen is present, the water will

be removed via vacuum truck and taken offsite treatment. An inspection of the tanks and valves should follow if any visible sheen is noted on standing water.

(b)(3)Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.

The fuel island tanks has associated piping that may be outside of the secondary containment. The hoses, when outside of containment, are not deemed a significant source for spill potential as they are controlled by a pump on the tank. Rupture of a hose would release less than 5 gallons, while not in operation, only the volume possibly within the line itself. The hoses and pumps/valves are set in a fail-safe mode, only activating during active operations. During operation when the lines are outside of containment, the fueling procedures described previously in this SPCC shall be followed and include being manned operations.

In the case of an unlikely scenario of tank overturn and rupture, the fuel would flow generally northeasterly. If this occurred during dry weather, the spilled material would likely infiltrate into the ground before reaching onsite drainage features. The spill would be managed in the vicinity of the discharge. If this rupture with overturn occurred during a rain event, the spilled materials could potentially discharge to an onsite man-made stormwater basin. While there is potential for subsurface connectively of the basin to Milner Spring Creek, the facility would be able to manage the water in the basin and limit or prevent further discharge. Spilled materials would also float within the basin, allowing for cleanup prior to subsurface discharge.

(b)(4)If facility drainage is not engineered as in paragraph (b)(3)of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.

Equipment necessary to quickly construct berms and other diversionary structures – including heavy equipment - to retain any released oil on-site is readily-available at the facility.

(b)(5)Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two ''lift '' pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in §112.1(b)in case there is an equipment failure or human error at the facility.

This section is not applicable.

(c)(1)Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.

Bulk storage containers used for oil storage at the facility that qualify as bulk storage containers are limited to the tanks and containers listed in Table 1 that store 55 gallons or more of POLs. Therefore, the following discussion pertaining to the requirements of §112.8(c) is limited to these tanks and containers.

(c)(2)Construct all bulk storage container installations so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.

All bulk storage tanks, associated piping and valves, and other appurtenances are constructed of materials compatible with the products in contact.

(c)(3)Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i)Normally keep the bypass valve sealed closed. (ii)Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b). (iii)Open the bypass valve and reseal it following drainage under responsible supervision; and (iv)Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2)and 122.41(m)(3)of this chapter.

Secondary containment open to the air and precipitation remains in the containment until physically pumped or otherwise removed by site personnel. None of the containment areas "free-drain".

(c)(4)Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.

There are no USTs associated with the facility. This section is not applicable.

(c)(5)Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.

This section is not applicable.

(c)(6)Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design (such as floating roof, skid- mounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non- destructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

When necessary, based on visual inspection or monitoring results, tanks would be drained, cleaned, inspected, repaired, and/or painted. Testing may involve pressure or hydrostatic testing of single walled tanks, or of the interstitial space of dual-walled tank, or other means as described by the manufacturer. Testing will be completed by a qualified person and records maintained for three years. Testing shall be completed every 8-years (or when modifications are made) for tanks where the exterior is fully visible for visual inspections as they are low-risk for unseen integrity issues. Tanks not fully visible should be tested every 3-years to ensure competency.

(c)(7)Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

There are no internal heating coils associated with the tanks at the facility; therefore, the requirements of §112.8(c)(7) do not apply.

(c)(8)Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices: (i)High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice. (ii)High liquid level pump cutoff devices set to stop flow at a predetermined container content level. (iii)Direct audible or code signal communication between the container gauger and the pumping station. (iv)A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers. (v)You must regularly test liquid level sensing devices to ensure proper operation.

ASTs are manned and monitored by direct vision during filling operations to prevent overfilling.

(c)(9)Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).

This section is not applicable.

(c)(10)Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.

Visible oil discharges are reported upon observation so they can be controlled and immediately corrected. Measures are taken to minimize and mitigate the spill or leak, and the source of the discharge is repaired or otherwise corrected. Accumulations of oil are promptly removed by responding personnel.

(c)(11)Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b).You must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

The only containers considered mobile or portable with oil storage are located within the shop and in areas with floor drains that discharge to a containment vault. Mobile refuelers are excepted from this section.

5.3 Facility Transfer Operations, Pumping, and In-Facility Process: §112.8(d)

(d)(1) Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.

No pipeline POL transfer operation occurs from ASTs. All aboveground piping and valves and piping are subjected to regular examinations by operating personnel. Buried pipelines are not present at the facility.

(d)(2)Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.

This section is not applicable.

(d)(3)Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.

Pipe supports are not present at this facility.

(d)(5)Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.

Transfer operations are manned, therefore vehicles in the area will be managed to keep clear during such operations.

(d)(4)Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.

Aboveground valves and piping are inspected on a regular basis by site personnel. Daily inspections are visual and conducted simultaneously with tank observations. Formal visual inspections of piping associated with aboveground storage tanks are conducted and documented on an annual basis.

6 REQUIREMENTS FOR ONSHORE OIL PRODUCTION FACILITIES: §112.9

This section is not applicable.

7 OTHER REQUIREMENTS OF PART 112 SUBPART B

Other requirements of Part 112 Subpart B are not applicable.

8 REQUIREMENTS OF PART 112 SUBPART C

The requirements of Part 112 Subpart C are not applicable.

Appendix A

Certification of Substantial Harm Determination

APPENDIX A

Certification of Substantial Harm Determination

Facility Name: Twin Enviro Services, Milner Landfill

Facility Address: 20650 County Road 205 Steamboat Springs, CO 80487

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

   Yes: _____ No: X

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

   Yes: _____ No: X

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

   Yes: _____ No: X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR 112, Appendix A to this or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake?[2]

   Yes: _____ No: X

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

   Yes: _____ No: X

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

[2] For the purposes of 40 CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

CERTIFICATION

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

_____

Signature

_____

Name

_____

Title

Appendix B

Spill Response Actions and Spill Release Documentation Form

Twin Enviro Miler Landfill
Measures to Be Taken In The Event Of A Spill

A. Protect	• Protect yourself from chemical hazards. • Use disposable gloves, Tyvek Coveralls, and boot covers to protect yourself and your clothing from potential exposure to oil and to minimize spread of contamination. • Do not drive a vehicle or walk through a spill area. • Use law enforcement to divert traffic around oil spills on roadways.
B. Contain	• Construct a temporary earthen berm or diversion structure to contain spilled or released oil as appropriate. • Plug, drain, or turn upright a leaking container or equipment, as appropriate. • Use sorbent pads and materials to contain the spill in the smallest area possible. • Use sorbent pads and materials to block all storm drain inlets and pathways to water bodies. • Use plastic sheeting to cover oil spills on soil and dig diversion ditches to prevent oil from being discharged to water bodies by storm water runoff. • Use barricade tape or an equivalent means to prevent Steamboat Ski & Resort personnel or the public from coming into contact with spilled oil.
C. First responder Identify	• Time • Location • Type and amount of POL spill • Any people affected? Injured? Other Dangers? • Waterway affected if any • Cause of release • Immediate containment actions taken
D. Reporting **§ 112.7(a)(4)**	• Immediately notify one of the following individuals & provide info from C. above: – Marlin Mullet – Rebecca Lindeman (303.517.8189) • Management will determine if it is a reportable spill and if necessary call: – 911 and/or Colorado State Patrol Haz Mat Unit 303-239-4565 – National Response Center 800-424-8802 – USEPA Region 8 303-312-6312 – CDPHE 303-692-3020 or 1-877-518-5608 – CO Dept of Labor/Employment/Oil/Public Safety 303-318-8500 or 877-518-5608 • REPORT: – Your name, location, organization, and telephone number – Name and address of the party responsible for the incident – Date and time of the incident – Location of the incident – Source and cause of the release or spill – Types of material(s) released or spilled – Quantity of materials released or spilled – Danger or threat posed by the release or spill – Number and types of injuries (if any) – Weather conditions at the incident location – Any other information that may help emergency personnel respond to the incident.
E. Cleanup	• Implement Discharge Countermeasures specified in Sections 6.8 and 6.9 of this SPCC Plan.
F. Document	• Provide written follow-up of the incident as described in Section 4.16 of this SPCC Plan. • Document the spill using the Spill Documentation form provided below, or equivalent.

SPILL DOCUMENTATION FORM

IMMEDIATE ACTIONS

Current Date and Time:

_____

Reporter Name and Telephone number:_____

Material released:_____

Quantity released:_____ Projected total release quantity:_____

Date of release:_____ Time of release:_____ Duration of release:_____

Facility: Steamboat Ski Resort

Work area within facility:_____

_____

Nature of Incident:_____

_____

_____

Release Description:

Media impacted (soil, air, water, concrete, etc):_____

Describe vapor cloud if any: Direction:_____ Height:_____

Color:_____ Odor:_____

Estimated wind speed and direction:_____

Was surface water impacted? No____ Yes____ If YES describe:_____

Did release travel off-site? No____ Yes____ If YES describe:_____

Was release contained indoors?_____

Cause of release:_____

_____

Description of Injuries:_____

_____

Response actions taken:

_____

_____

_____

Appendix C

Inspection Forms

Twin Enviro Services, Milner Landfill

SPCC INSPECTION RECORD

(Required at least annually)

Note major observations relating to the implementation of the SPCC Plan and inspection criteria. Also note corrective actions required for proper handling, recycling, and disposal of oil. Use space below for corrective actions and attach additional sheets and/or photographs as necessary.

Inspector Name & Signature: _____ Date: _____

SPCC Potential Pollutant Source	General Condition of Tank (note any deformations, corrosion, staining etc.)	General Condition of Secondary Containment (note any cracks, drain valve closed/locked etc.)	Foundation/Tank Base (note any staining, spills, water against base, etc.)	Condition of hoses and fittings (note cracks, splits, staining, etc.)	General Housekeeping Condition	Major Observations / Corrective Action Requirements
ASTs						
Offroad diesel						
Gasoline						
Methanol						
Road diesel						
Oily-water #1						
Oily-water #2						
Shop						
Used oil						
PowerDrive fluid 10W						

SPCC Potential Pollutant Source	General Condition of Tank (note any deformations, corrosion, staining etc.)	General Condition of Secondary Containment (note any cracks, drain valve closed/locked etc.)	Foundation/Tank Base (note any staining, spills, water against base, etc.)	Condition of hoses and fittings (note cracks, splits, staining, etc.)	General Housekeeping Condition	Major Observations / Corrective Action Requirements
PowerDrive 30						
Engine Oil 15W40						
PowerDrive 50						
Diesel exhaust fluid						
used oil						
used antifreeze						
Various 55 gallon drums						
Exterior vault used as secondary containment for shop						

(1) Documentation of inspections may be retained on alternative records.
(2) If observations require corrective action, record the details of these requirements below or attach.

Corrective Actions:

Mobile Equipment:
(note housekeeping and any maintenance or storage issues)

Spill Kits:

Spill Kit Location	Kit Available and Contents Complete (Y/N)	Kit Restocked With:

Spill Kit Location	Kit Available and Contents Complete (Y/N)	Kit Restocked With:

Additional Notes:

Appendix D

Employee Training Log

SPCC EMPLOYEE TRAINING LOG

Topic	SPCC Awareness	**Meeting Date:**	
Facilitator:		**Place/Room:**	Twin Enviro, Milner

Note: New employees shall receive initial training in the contents and implementation of this SPCC plan upon start of their employment. All employees shall receive annual refresher training in the contents and implementation of this SPCC plan.

Name	Job Duty	Initial or Annual?

Tables & Figures

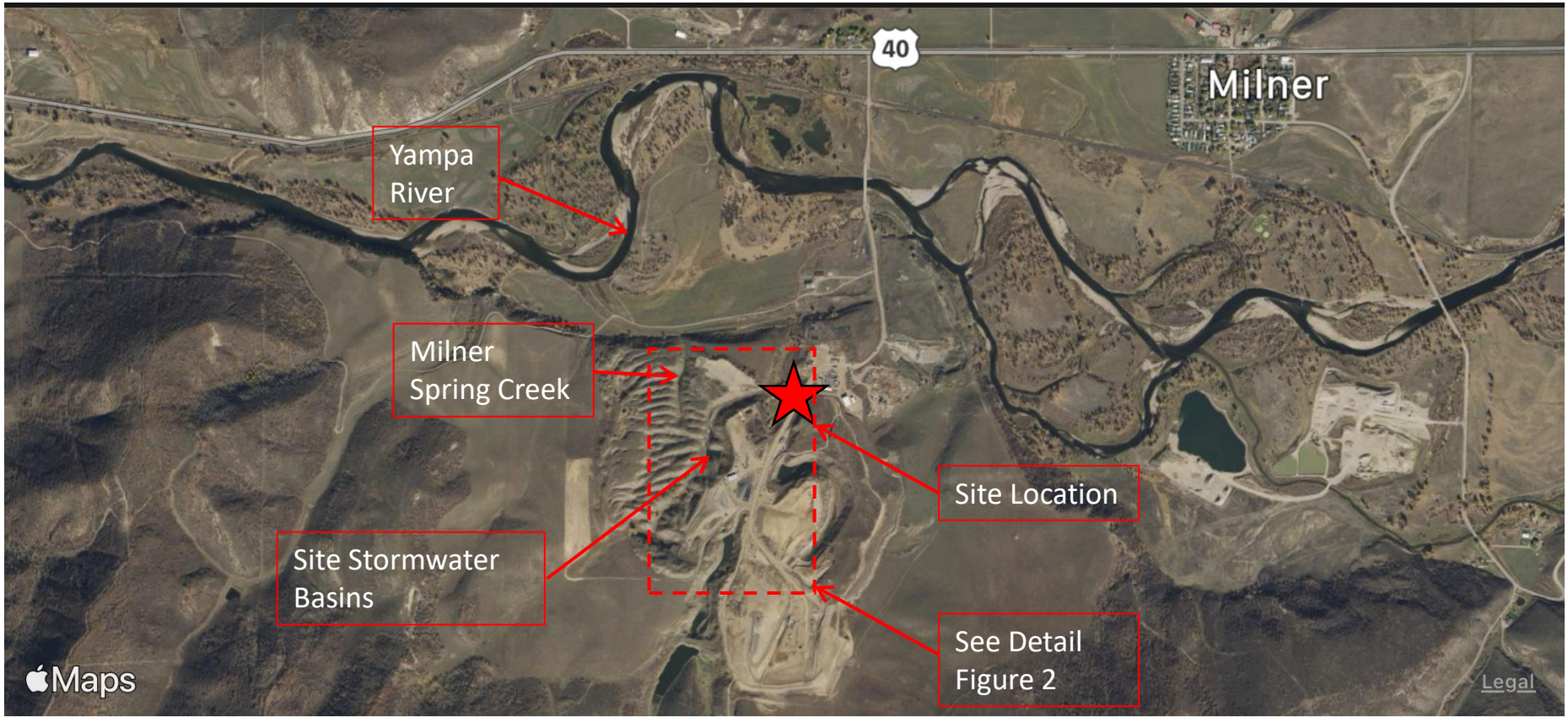
Table 1 - Tank Inventory
Twin Enviro Services
Milner Landfill
July 2021

Quantity	Tank Contents	Tank Capacity (gallons)	Location	Containment Type	Effective Containment Volume	Tank Material	Failure Rate (gpm)	Failure flow direction
1	Offroad diesel	2,000	fuel island at shop	Tank inside steel box	>100%	steel	2,000	N to onsite stormwater basin; subsurface connectivity to Milner Spring Creek
1	Gasoline	500	fuel island at shop	Tank inside steel box	>100%	steel	500	N to onsite stormwater basin; subsurface connectivity to Milner Spring Creek
1	Methanol	1,000	fuel island at shop	Tank inside steel box	>100%	steel	1,000	N to onsite stormwater basin; subsurface connectivity to Milner Spring Creek
1	Road diesel	2,000	fuel island at shop	Tank inside steel box	>100%	steel	2,000	N to onsite stormwater basin; subsurface connectivity to Milner Spring Creek
1	Road diesel	4,000	fuel island at shop	Tank inside steel box	>100%	Steel	4,000	N to onsite stormwater basin; subsurface connectivity to Milner Spring Creek
1	Used oil	1,000	Shop	dual walled	>100%	steel in concrete	1,000	Shop floor drain; see containment vault below
1	PowerDrive fluid 10W	300	shop	shop floor drain	100%	steel	300	Shop floor drain; see containment vault below
1	PowerDrive 30	145	shop	shop floor drain	100%	steel	145	Shop floor drain; see containment vault below
1	Engine Oil 15W40	145	shop	shop floor drain	100%	steel	145	Shop floor drain; see containment vault below
1	PowerDrive 50	125	shop	shop floor drain	100%	steel	125	Shop floor drain; see containment vault below
1	Diesel exhaust fluid	250	shop	shop floor drain	100%	poly	250	Shop floor drain; see containment vault below
5	misc.	55	shop	shop floor drain	100%	steel	55	Shop floor drain; see containment vault below
1	Windshield washer	55	shop	shop floor drain	100%	poly	55	Shop floor drain; see containment vault below
1	used oil	250	shop	shop floor drain	100%	steel	250	Shop floor drain; see containment vault below
1	used antifreeze	250	outside shop	none	0%	poly	250	Move to inside shop
1	oily contaminated water	20,000	Southeast of Shop	bermed	>100%	steel	20,000	N-NE; to onsite stromwater channels; subsurface connectivity to Milner Spring Creek
1	Vault servicing shop floor	1,000	North of shop	Acts as secondary containment for shop	NA	concrete	NA	N-NW, underground to onsite stormwater basin; subsurface connectivity to Milner Spring Creek

Total Volume	**33,075**

Table 2 - Mobile Equipment Inventory
Twin Enviro Services
Milner Landfill
May 2021

Equipment	Fuel Capacity (gal)	Hydraulic Oil Capacity (gal)	Typical Parked Location
Cat D8R, 1998	165.2		Near working face
Cat Loader 950G, 2000	78		Near working face
Cat Loader 950M, 2017	72.6		Near working face
Volvo RO, 2001, ol red			Near working face
Cat Excavator 325CL, 2004	132.1	81.9	Near working face or borrow area
Cat Haul Truck 730, 2006	95.2		Near working face or borrow area
Cat Haul Truck 730, 2006	95.2		Near working face or borrow area
Cat Excavator 330DL, 2007	163.8	108.3	Near working face or borrow area
Cat D6 N LGP,	79		Near working face
Cat FE Loader 950M, 2017	72.6		Near working face
John Deere Skid steer for MRF 318E stock#	20.1		Near working face
Peterson 4710 Horizontal Grinder	300	95	Near Shop
CAT 826H, 2014	177.6		Near working face
Fuel Truck	300		Near Shop and Fuel Island



N

SPCC Plan, Twin Enviro Milner Landfill

Figure 1
Site Location

Jardon
Engineering & Inspections LLC

N

General Spill Flow Direction

SPCC Plan, Twin Enviro Milner Landfill

Figure 2
Inventory Locations

Jardon
Engineering & Inspections LLC