

Spill Prevention, Control and Countermeasure Plan

Pike Solar Facility
El Paso County, Colorado

PREPARED FOR:
JSI Construction Group LLC

November 2021

PREPARED BY:
Sunrise Engineering, Inc.



November 5, 2021

Mr. Mark Marion
JSI Construction Group LLC
1710 29th Street, Suite 1068
Boulder, CO 80301

Subject: Spill Prevention, Control, and Countermeasure Plan
Pike Solar Facility
El Paso County, Colorado

Mr. Marion:

Sunrise Engineering, Inc. (Sunrise) has completed a Spill Prevention, Control, and Countermeasure (SPCC) Plan for the Pike Solar project located in El Paso County, Colorado. The U.S. Environmental Protection Agency (EPA) SPCC Regulation, i.e., Title 40 of the Code of Federal Regulations Part 112 (40 CFR 112) requires certain facilities to prepare and implement an SPCC Plan. The SPCC regulations are applicable to this facility. The following is a summary of the general SPCC Plan requirements:

- Review the SPCC Plan every five years to ensure that the SPCC Plan is up-to-date and the facility's SPCC provisions are in place.
- Update the SPCC Plan to reflect changes to the facility within six months of the changes.
- Maintain a copy of the SPCC Plan onsite and provide it to EPA personnel upon request.
- Periodically train relevant personnel on applicable requirements of the SPCC Plan.
- Periodically inspect (monthly and annually) oil storage areas, secondary containment equipment, and containers.
- Promptly clean up oil leaks, drips, and spills.

Please review the SPCC Plan for required procedures and programs.

The SPCC Plan requires the approval of a manager with the authority necessary to implement the plan. Section 2.1 of the SPCC Plan contains a signature block for certifying management approval. To comply with the requirements of 40 CFR 112, the appropriate manager must sign and date the Management Approval and Certification block.

Sunrise determined that the facility would not be expected to cause "substantial harm" (40 CFR 112, Appendix B) to the environment by discharging oil into the navigable waters or onto adjoining shorelines. Appendix B of this SPCC Plan provides the "Certification of the Applicability of the Substantial



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Harm Criteria Checklist". To comply with the requirements of 40 CFR 112, the appropriate manager must also sign and date the checklist at the signature block of Appendix B.

The SPCC Plan was developed in general accordance with EPA's SPCC Regulation (40 CFR 112) and in accordance with generally accepted environmental practices in the vicinity of the project at the time it was prepared. The limitations of this SPCC Plan should be recognized as the Pike Solar Facility and formulates conclusions on spill control measures at that facility.

The development of the SPCC Plan relied primarily on readily available information and visual observations. Sunrise is not responsible for the implementation and upkeep of the SPCC Plan or for addressing potential concerns on-site. Sunrise does not warrant the work of third parties supplying information, which may have been used during the preparation of this report.

Sunrise accepts no responsibility or liability to any person or organization for any claim, for loss or damage (including attorney's fees) caused, or believed to be caused, directly or indirectly by: conditions revealed or not revealed by the SPCC Plan, fines levied by regulatory agencies, and releases or spills of oils. No warranties, either expressed or implied, are provided.

We appreciate the opportunity to be of service to you on this project. If there are any questions concerning this plan, or if we may be of further assistance, please contact us at (801) 523-0100.

Sincerely,

SUNRISE ENGINEERING, INC.

Prepared by:

A handwritten signature in black ink, appearing to read "Dao Yang".

Dao Yang
Project Manager/Hydrogeologist

Reviewed by:

A handwritten signature in blue ink, appearing to read "Robert Worley".
Robert Worley, P.E.
Vice President

JSI CONSTRUCTION GROUP LLC

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

PIKE SOLAR FACILITY, EL PASO COUNTY, COLORADO

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	PURPOSE	1
1.2	GENERAL APPLICABILITY	1
2	MANAGEMENT APPROVAL AND CERTIFICATION.....	3
2.1	MANAGEMENT APPROVAL (40 CFR 112.7).....	3
2.2	DESIGNATED PERSON (40 CFR 112.7)	4
3	PROFESSIONAL ENGINEER CERTIFICATION (40 CFR 112.3(D)).....	5
4	PLAN MAINTENANCE [§112.3, §112.5 AND §112.7]	6
4.1	REQUIREMENT TO PREPARE [§112.3].....	6
4.2	PLAN REVIEW AND AMENDMENTS [§112.5]	6
4.2.1	<i>Changes in Facility Configuration [§112.5(a)]</i>	<i>6</i>
4.2.1.1	Non-Technical Amendments.....	6
4.2.2	<i>Schedule Plan Reviews [§112.5(b)]</i>	<i>7</i>
4.3	GENERAL REQUIREMENTS [§112.7]	7
4.4	FULLY OPERATIONAL EQUIPMENT [§112.7].....	8
4.5	DEVIATION AND EQUIVALENT ENVIRONMENTAL PROTECTION [§112.7(A)(2)].....	8
4.5.1	<i>Deviations from Integrity Testing</i>	<i>8</i>
5	FACILITY DESCRIPTION GENERAL [§112.7(A)(3)].....	9
5.1	GENERAL FACILITY INFORMATION.....	9
5.2	GENERAL FACILITY DESCRIPTION	9
5.3	OIL STORAGE	10
5.4	DISTANCE TO NAVIGABLE WATERS AND ADJOINING SHORELINES AND FLOW PATHS.....	11
5.5	DISCHARGE PREVENTION AND ROUTINE HANDLING PROCEDURES.....	11
6	RELEASE RESPONSE [§112.7(A)(3-5)]	13
6.1	RELEASE RESPONSE PROCEDURES.....	13
6.2	RECOVERED MATERIAL DISPOSAL.....	14
6.3	INCIDENTAL RELEASES.....	14
7	RELEASE NOTIFICATION [§112.7(A)(4)]	15
7.1	GENERAL PROCEDURES FOR ALL SPILLS.....	15
7.2	COLORADO SPILL REPORTING REQUIREMENTS.....	16
7.3	VERBAL NOTIFICATIONS TO FEDERAL AGENCIES.....	16
7.4	INFORMATION TO PROVIDE DURING VERBAL NOTIFICATIONS.....	16
7.5	WRITTEN NOTIFICATIONS TO GOVERNMENT AGENCIES	17

7.6	WRITTEN NOTIFICATIONS TO FEDERAL AGENCIES.....	17
7.7	INCIDENT TERMINATION.....	18
8	EVALUATION OF DISCHARGE POTENTIAL [§112.7(B), (C) & (D)]	19
8.1	POTENTIAL DISCHARGE VOLUMES	19
8.2	DIRECTION OF FLOW [§112.7(B)].....	19
8.2.1	Off-Site.....	19
8.2.2	On-Site.....	19
8.3	DISCHARGE CONTAINMENT [§112.7(c)]	19
8.3.1	Containment and Diversionary Structures.....	19
8.3.2	Spill Response Equipment.....	20
8.4	PRACTICABILITY OF SECONDARY CONTAINMENT [§112.7(d)].....	20
8.5	ALTERNATIVE REQUIREMENTS TO GENERAL SECONDARY CONTAINMENT FOR QUALIFIED OIL-FILLED EQUIPMENT [§112.7(d)]	20
9	INSPECTION, TESTS, AND RECORDS [§112.7(E)]	21
9.1	DAILY INSPECTIONS	21
9.2	MONTHLY INSPECTIONS	21
9.3	QUARTERLY INSPECTIONS	22
9.3.1	Certified Inspections.....	23
9.4	RECORDKEEPING.....	23
10	EMPLOYEE TRAINING [§112.7(F)]	24
10.1	SAFETY MEETINGS	24
11	SECURITY [§112.7(G)]	26
11.1	FENCING.....	26
11.2	SITE INSPECTION.....	26
11.3	VALVES.....	26
11.4	PIPELINE CONNECTIONS	26
11.5	LIGHTING	26
12	LOADING AND UNLOADING RACKS [§112.7(H)]	27
13	BRITTLE FRACTURE EVALUATION [§112.7(I)]	28
14	CONFORMANCE WITH REGULATIONS [§112.7(J)].....	29
15	FACILITY DRAINAGE [§112.8(B)]	30
16	BULK STORAGE CONTAINERS [§112.8(C)]	31
17	PORTABLE OIL STORAGE CONTAINERS [§112.8(C)(11)]	32
18	FACILITY TRANSFER OPERATIONS [§112.8(D)]	33

LIST OF FIGURES

Figure 1	Site Vicinity Map
Figure 2	Site Layout Map
Figure 3	Site Map – Areas 1 & 2
Figure 4	Site Map – Areas 3, 4, 5 & 8
Figure 5	Site Map – Areas 7 & 8

LIST OF TABLES

TABLE 2-1: CONTACT INFORMATION FOR DESIGNATED PERSON AND OTHERS.....	4
TABLE 4-1: OIL-FILLED EQUIPMENT.....	8
TABLE 5-1: SPILL CONTAINMENT AND CLEANUP EQUIPMENT	11

LIST OF APPENDICES

Appendix A	Regulatory Requirement Cross-Reference Table
Appendix B	Certification of Substantial Harm Determination
Appendix C	SPCC Plan Review Log
Appendix D	Oil-Filled Equipment Inventory
Appendix E	Spill Reporting Matrix, Contact List and Spill Log
Appendix F	Inspection Form and Checklist
Appendix G	Tank Filling Procedures

1 INTRODUCTION

1.1 Purpose

This Spill Prevention, Control, and Countermeasure (SPCC) Plan is prepared in accordance with Title 40 Code of Federal Regulations Part 112 (40 CFR 112). The purpose of this SPCC Plan is to describe the procedures followed by JSI Construction LLC to prevent, control, and mitigate releases of oil and petroleum products to navigable waters at the Pike solar facility located in El Paso County, Colorado. Navigable waters are waters of the United States, as defined by the Clean Water Act, and include, but are not limited to, rivers, streams, ephemeral washes, and wetlands. This SPCC Plan is required because greater than 1,320 gallons of FR3 biodegradable soybean oil and inhibited mineral oil type II are stored above ground at the solar facility.

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 (EPA) 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 SPCC plans.

On July 17, 2002, EPA published modifications to the SPCC requirements in the Federal Register (Volume 67, No. 137, pages 47041-47152). In December 2006, EPA signed a final rule amending 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. In addition, these revisions require that the owner or operator must combine visual inspections with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic testing, or other system of nondestructive shell testing. This SPCC Plan has been prepared in accordance with these revised regulations.

Appendix A provides a cross-reference table for the applicable requirements of 40 CFR Part 112. Appendix A provides the exact wording of the federal rule and the corresponding sections in this SPCC Plan where the requirements are addressed. The substantive requirements (§112.7 and §112.8) are addressed in the SPCC Plan. Additional information and diagrams are included as appendices and figures attached to the SPCC Plan. The format of this SPCC Plan is intended to be an efficient presentation of pertinent information for use at the solar facility.

1.2 General Applicability

The Oil Pollution Prevention Regulations (40 CFR Part 112) require preparation of an SPCC 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 an SPCC Plan

to be developed for a facility where the aggregate storage capacity of oil is greater than 1,320 gallons (including containers with thresholds of 55 gallons or greater) and which, due to its location, could reasonably be expected to discharge oil in quantities that may be harmful. Oil is defined as including petroleum, fuel oil, transformer oil, greases, synthetic oils, mineral oils, vegetable oil, oil refuse, 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, oil in equipment, tote tanks, and 55-gallon drums.

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, could be required to develop a Facility Response Plan (FRP) under §112.20. The certified checklist demonstrating that these requirements are not applicable to the facility included in this SPCC Plan is provided in Appendix B.

The purpose of this SPCC 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 SPCC Plan also establishes the activities required to mitigate such discharges if they occur. Discharge of oil is specifically prohibited by law if it affects water quality; causes a film, sheen, or discoloration of the water surface or upon water or adjoining shorelines; or causes a sludge or emulsion to be deposited beneath the surface of the adjoining shorelines. Discharge includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil, but excludes discharges in compliance with applicable federal, state, and local regulations.

2 MANAGEMENT APPROVAL AND CERTIFICATION

2.1 Management Approval (40 CFR 112.7)

JSI Construction Group LLC is committed to the prevention of discharges of oil or oily wastewater to navigable waters and the environment. JSI Construction Group LLC maintains the highest standards for spill prevention through regular review, updating, and implementation of this SPCC Plan for the Pike Solar facility. JSI Construction Group LLC hereby commits the required equipment, material, and human resources to expeditiously control and remove discharges of oil in harmful quantities.

"I have personally reviewed the contents of this SPCC Plan and, to the best of my knowledge, find it to be accurate and representative of actual conditions of operation, I further attest that the SPCC Plan has my approval, and that, in my current management capacity, I have the commensurate authority to commit the necessary resources and manpower to implement and comply with the provisions of the SPCC Plan."

Construction

Authorized Facility Representative: Brian Vickers

Signature: _____

Title: Project Manager

Date: 11/5/2021

Operations

Authorized Facility Representative: Sisay Dibabu

Signature: _____

Title: Director, Operations

Date: 11/5/2021

This certification shall in no way relieve JSI Construction Group LLC of the responsibility to prepare and fully implement this SPCC Plan in accordance with 40 CFR Part 112.

2.2 Designated Person (40 CFR 112.7)

Brian Vickers, Project Manager, is the Designated Person accountable for oil spill prevention at the facility during construction and has the authority to commit the necessary resources to implement the SPCC Plan.

Sisay Dibabu, Director, Operations, is the Designated Person accountable for oil spill prevention at the facility during operations and has the authority to commit the necessary resources to implement the SPCC Plan.

The other individuals, as listed in Table 2-1, may also be contacted in the event the Designated Person is not available.

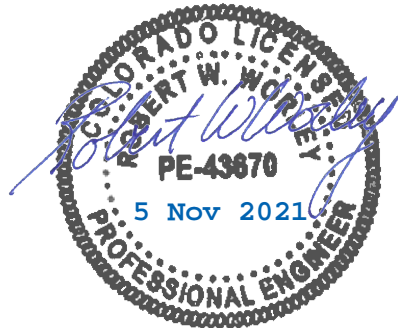
Table 2-1: Contact Information for Designated Person and Others

Name	Title	Telephone Number
Sisay Dibabu	Director, Operations	720-838-2339
Brian Vickers	Project Manager	720-838-2302

3 PROFESSIONAL ENGINEER CERTIFICATION (40 CFR 112.3(D))

The undersigned registered professional engineer is familiar with the requirements of 40 CFR 112 and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned professional engineer attests that this SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR 112, that procedures for required inspections and testing have been established, and that this SPCC Plan is adequate for the facility.

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112. This SPCC Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in the SPCC Plan.



Engineer: Robert Worley, P.E.
Registration Number: 43670

Professional Engineer certification is required for the original SPCC Plan, and SPCC Plan reviews and amendments that include a physical change that materially affects the oil spill potential. Non-physical changes (e.g., personnel names, titles and telephone numbers) do not require professional certification.

4 PLAN MAINTENANCE [§112.3, §112.5 AND §112.7]

4.1 Requirement to Prepare [§112.3]

In accordance with §112.3(a), this SPCC Plan was completed and fully implemented as of the date noted by facility management in Section 2.0. The Pike Solar facility will maintain a complete copy of this SPCC Plan (either electronic or hard copy) onsite. In addition, the SPCC Plan will be available to authorized representatives of local, state, or federal governing agencies for onsite review and a copy will be submitted if requested.

4.2 Plan Review and Amendments [§112.5]

4.2.1 *Changes in Facility Configuration [§112.5(a)]*

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, JSI Construction Group LLC will amend this SPCC Plan within 6 months of the change and implement the amended Plan within 6 months of its completion. These changes may include, but are not limited to:

- Commissioning or decommissioning of bulk storage containers,
- Replacement, reconstruction or movement of bulk storage containers,
- Construction or demolition that might alter secondary containment structures, or
- Changes of products or services, revisions to standard operation, medication of test/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Technical amendments to the SPCC Plan must be certified by a registered Professional Engineer or owner/operator, depending on the level of required changes. Decommissioning or removing containers or replacing a container with a similar type of container, may not necessarily constitute a technical amendment to the SPCC Plan that requires recertification by a registered Professional Engineer if the change does not materially affect the facility's potential for a discharge. This determination will be made using best professional judgment of the SPCC Plan Coordinator on a case-by-case basis.

Amendments to the SPCC Plan will be fully implemented at the facility as soon as possible, but no later than six months after the date of the amendments.

4.2.1.1 Non-Technical Amendments

Minor changes (e.g., non-technical amendments) can be made by the SPCC Plan Coordinator and do not require certification by a registered Professional Engineer. These amendments may include, but not be limited to:

- Change in the name or contact information of individuals responsible for the implementation of this SPCC Plan,
- Change in the name or contact information of spill response or cleanup contractors, or
- Changes in text, tables, figures, forms or other information in the main body and appendices of this SPCC Plan that do not materially affect the facility's potential for a discharge.

4.2.2 Schedule Plan Reviews [§112.5(b)]

In addition to the requirement to make changes to the SPCC Plan whenever there are certain changes in facility design, construction, operation, or maintenance, this SPCC Plan will be reviewed and evaluated at least once every five years by the SPCC Plan Coordinator. As a result of this review and evaluation, the SPCC Plan Coordinator will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge of oil in quantities that are harmful. Amendments to the Plan will be fully implemented at the facility as soon as possible, but no later than six months after the date of the amendments. Technical amendments to the SPCC Plan must be certified by a registered Professional Engineer or owner/operator.

This SPCC Plan will be reviewed and initiated when the construction of the facility is complete. The next SPCC Plan review is scheduled to take place on or prior to 5-years after the completion of the facility.

The SPCC Plan Coordinator is responsible for initiating and coordinating scheduled SPCC Plan reviews and amendments. Completion of each scheduled SPCC Plan review and evaluation will be documented in the log of SPCC Plan reviews and amendments found in Appendix C. The documentation will include a signed statement as to whether the SPCC Plan will be amended as a result of the scheduled review and evaluation. The statement will include the following words:

"I have completed review and evaluation of the SPCC Plan for the Pike Solar facility on [INSERT DATE] and will (or will not) amend the Plan as a result."

Facilities subject to the SPCC requirements are required by §112.5(c) to have technical changes made to their plans certified by a Professional Engineer or owner/operator.

4.3 General Requirements [§112.7]

As previously indicated, this SPCC Plan has been prepared in accordance with sound engineering practice, with management approval at a level with authority to commit necessary resources for full implementation, and with a table (Appendix A) that cross-references the location of requirements listed in §112.7 and their location within the SPCC Plan.

4.4 Fully Operational Equipment [§112.7]

JSI Construction Group LLC currently anticipates the following bulk storage containers, oil-filled equipment, and secondary containment regulated by 40 CFR 112 as listed in Table 4-1.

Table 4-1: Oil-Filled Equipment

Chemical	Use	Storage Location/Type	State	Storage Quantity
FR3 biodegradable soybean oil	Electrical Equipment	Transformers among panels	Liquid	Forty-five (45) 892-gallon transformers
Inhibited mineral oil type II	Electrical equipment	Transformer at substation	Liquid	One (1) 11,979-gallon transformer
Inhibited mineral oil type II	Battery energy storage system (BESS)	Transformers at BESS	Liquid	Twenty (20) transformers each with <10,000 gallons of oil
Gasoline/Diesel	Construction vehicles	Portable ventilated tanks in staging areas	Liquid	Two double-walled tanks with <1,000-gallon total capacity

4.5 Deviation and Equivalent Environmental Protection [§112.7(a)(2)]

4.5.1 *Deviations from Integrity Testing*

EPA's SPCC Guidance for Regional Inspectors, Version 1.1, states that in lieu of integrity testing, environmental equivalence can be achieved via monthly inspections for elevated drums and elevated shop-built containers with a capacity of less than 30,000 gallons, where all sides of the container are visible. In addition, the guidance states that EPA recognizes that industry standards typically only require visual inspection for single-use bulk storage containers; therefore, containers that meet these criteria will not be integrity tested.

The preamble to the SPCC Rule revisions issued by EPA on July 17, 2002 lists the Steel Tank Institute (STI) Standard SP001 as an industry standard that may be used to assist with the integrity testing guidelines required by 40 CFR 112.8(c)(6). STI's Standard SP001 does not require integrity testing for certain aboveground storage tank configurations that are inspected on a regular basis. Furthermore, EPA's SPCC Guidance for Regional Inspectors also notes that certain tank sizes and configurations may only require frequent visual inspection, in lieu of integrity testing. Therefore, regular inspections will be considered equivalent environmental protection for certain bulk storage containers that meet the STI Standard SP001 criteria.

5 FACILITY DESCRIPTION GENERAL [§112.7(A)(3)]

5.1 General Facility Information

Name of Facility: Pike Solar Facility
Location of Facility: El Paso County, Colorado.

Name and Address of Owner:

Name: JSI Construction Group LLC
Address: 1710 29th Street, Suite 1068
Boulder, Colorado 80301

Designated Person accountable for oil spill prevention at facility:

Name and Title: Brian Vickers, Project Manager (construction)
Sisay Dibabu, Director, Operations (operations)

5.2 General Facility Description

The Pike Solar facility consists of eight areas (Areas 1 through 8) and is a single-axis tracking photovoltaic (PV) solar energy generation facility to be constructed during 2021 through 2023. The 175-megawatt (MW) facility will deliver electricity directly to the Colorado Springs Utilities' distribution system. The facility will also have a 75-MW, 200-MWh battery energy storage system. This renewable energy facility includes low-profile, rammed-post racking (up to 5-foot high) to which the PV modules are affixed, skid-mounted equipment, internal gravel access drives and a utility shed. The facility is located in a portion of Sections 7, 18, 19, 30 and 31, Township 16 South, Range 64 West, and a portion of Sections 11, 12, 13, 14, 23, 25, 26, 35 and 36, Township 16 South, Range 65 West, 6th P.M. in El Paso County, Colorado. The location of the facility is shown in Figure 1.

The general layout and diagram of the facility with the onsite locations of regulated oil use are presented in Figures 2 through 5. Discharges of any spilled or released regulated oil are expected to follow storm water runoff flow directions presented in Figures 3 through 5 and as described in Appendix D.

The facility includes the following main elements (Figures 2 through 5):

- PV solar modules
- Single-axis tracking systems mounted on low-profile, rammed-post racking
- Power inverters
- Forty-five (45) small three-phase skid-mounted transformers (or power stations)
- One (1) three-phase pad mounted main power transformer (substation)
- Interior gravel maintenance roads

- One (1) 75-MW BESS where 20 transformers will be located on concrete pads
- Utility shed to accommodate the operation and maintenance (O&M) of the facility
- Construction staging areas where two (2) temporary portable double-walled gasoline/diesel tanks with a total capacity of less than 1,000 gallons will be stored. These tanks will be removed from the site once the construction work is completed.
- Perimeter fence

Each of the 45 transformers contains approximately 892 gallons of insulating oil (FR3 biodegradable soybean oil) and is mounted on a steel skid. The main power transformer at the Pike Solar substation contains approximately 11,979 gallons of inhibited mineral oil type II and is located on a concrete pad. The site is relatively flat (average surface slope ranges from 0.01 to 0.07 in varying directions, as shown in Figures 3 through 5). Onsite stormwater improvements have been designed to maintain pre- vs. post development runoff conditions.

5.3 Oil Storage

The following is a description of the oil storage at the Pike Solar facility. Oil storage occurs in the following oil-filled equipment:

- Forty-five (45) small transformers filled with 892 gallons of insulating oil (FR3 biodegradable soybean oil) throughout the site, as shown in Figures 3 through 5.
- One (1) main power transformer filled with 11,979 gallons of inhibited mineral oil type II at the Pike Solar substation, as shown in Figures 2 and 5.
- Two (2) temporary portable gasoline/diesel tanks in staging areas with a total capacity of less than 1,000 gallons.
- Twenty (20) transformers with unknown volume of mineral oil in the BESS (Figures 2 and 5).
- The Pike Solar facility does not contain any transfer stations or connecting pipes.

The containers and equipment storing regulated oil applicable to this SPCC Plan are listed in Appendix D.

In the event that bulk storage containers go out-of-service, they will remain in the SPCC Plan inventory and will require periodic inspections per Section 9.1 until they are “permanently closed” or removed from the site. “Permanently closed” is defined by SPCC regulations as a container for which:

- All liquid and sludge has been removed from the container and connecting lines;
- All connecting lines and piping have been disconnected and blanked off;
- All valves (except ventilation valves) have been closed and locked; and
- Conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.

The SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) will be informed of any “permanent closure” activities at the facility so that the SPCC Plan may be updated accordingly.

5.4 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

Figures 3 through 5 indicate that the site has elevations ranging from approximately 5,380 feet to 5,595 feet above mean sea level (msl). The site is located in a relatively flat area. The ground surface generally slopes gently towards varying directions, as shown in Figures 3 through 5. Williams Creek and its unnamed tributaries runs through the area. The flow paths are assumed to follow the topographic slope, as shown in Figures 3 through 5. The shortest distance from the edge of the site to the creek is about 500 feet.

5.5 Discharge Prevention and Routine Handling Procedures

Discharge prevention measures that shall be used at the Pike Solar facility include the following:

- Implementation of best management practices (BMPs) to prevent spills and releases (e.g., closed containers, supervised operations) during the handling of oil and during loading or unloading operations,
- Readily available equipment and supplies for spill containment and cleanup,
- Discharge prevention training for applicable operations and maintenance personnel, and
- Visual inspections of containers, and equipment conducted during the course of normal site visits and operational activities.

Equipment and supplies for spill containment and cleanup are provided at the facility and consist of the supplies listed in Table 5-1.

Table 5-1: Spill Containment and Cleanup Equipment

Item	Location
Various absorbents: pads, socks, "Oil-dry", etc.	Site-wide
Spill Containment Kits in 20-gallon plastic garbage cans with lids containing: Personal Protective Equipment (PPE) (disposable gloves, boots, coveralls), absorbents, brooms, shovels, dust pans, plastic bags, and tape	SPCC area and various areas throughout project and/or utility shed

This material is sufficient to respond to most minor discharges occurring at the facility and to initially contain a major discharge while waiting for additional material or support from outside contractors. The inventory is verified during the scheduled site inspection by designated personnel and is replenished as needed. Additionally, during construction, loaders and other heavy equipment are available onsite and may also be dispatched as needed for spill cleanup.

Pike Solar personnel having key responsibilities under this SPCC Plan for spill prevention and response are trained annually to respond to spills, as described in Section 6.1. During training, they will learn how to contain a particular spill and how to properly dispose of material once the discharge has been stopped. Oil spill containment/cleanup supplies are available at the Pike Solar facility to allow for a quick response time and thus a quicker containment time once the discharge has been detected.

Pike Solar personnel responsible for oil handling are trained in visual inspection procedures during the annual SPCC training. There are no onsite containers that hold petroleum products. Containers holding oil shall be visually inspected following any oil transfer operations.

6 RELEASE RESPONSE [§112.7(A)(3-5)]

6.1 Release Response Procedures

The following release response procedures were developed in accordance with EPA standards. These procedures were created to assist Pike Solar employees in responding to releases in an efficient manner, while providing for the protection of employees, facilities, and the surrounding environment. No employee is required to respond to any type of release if conditions are unsafe. A complete list of contact names and phone numbers is provided in Appendix E.

Response procedures are listed below:

1. Identify the character, source, amount, and extent of the release. *Do not enter* a hazardous area until hazards have been assessed and controlled. *Stay upwind/uphill* of any release.
2. Turn off nearby sources of ignition (*if this can be done safely*). Report release to the Site Manager or next in command if the Site Manager is unavailable.
3. The Site Manager on duty shall evaluate the release and determine if it qualifies as a small release or if the Emergency Response Plan should be activated.
4. Immediately notify SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) for any of the following discharges of petroleum products:
 - Discharge of any quantity that poses an imminent danger or involves injured personnel;
 - Discharge of any quantity that reaches a river or wash;
 - Discharge of any quantity that is not contained by a secondary containment basin or diversionary structure; and/or
 - Any discharge greater than five (5) gallons, even if captured within the secondary containment.
5. If you have not been trained to respond to releases, take no further action and wait for emergency responders.
6. If you have been trained to respond to releases, take active measures to contain the release *without undue risk of personal injury*. Make sure that proper personal protective equipment (PPE) is worn to provide skin and respiratory protection from the hazards involved with spill containment, cleanup and disposal. PPE may include hard hat, boots, safety glasses, gloves, and respirators (as necessary).
7. Attempt to extinguish any incipient stage fires.
8. Utilize valve line ups or other operational measures to stop or slow the release if material is still being released.
9. For releases in a containment area, make sure any valves in the containment wall are closed.
10. For large releases in undiked areas, develop a security perimeter around the impacted area, construct makeshift dikes of materials from the spill kits such as: absorbent materials, pigs, mats or other available materials around the release.

11. Ensure that the spill has been contained and do whatever is necessary to stop it from entering a waterway.
12. For small releases in undiked areas, place absorbent materials directly on the spilled oil.
13. Never clear the spill away with water.

A flow chart outlining release response procedures is included in Appendix E.

6.2 Recovered Material Disposal

Materials recovered during a spill event will be appropriately containerized. Used absorbent material and recovered petroleum-contaminated articles from releases will be placed in roll-off bins.

For spills on gravel or porous earthen material, as much free liquid as possible will be collected with absorptive material or removed prior to excavating the material. All petroleum-contaminated soil must be removed, placed on plastic, and stored in a designated container. The Pike Solar facility will manage the container in a designated area. The spill location will be examined by the Supervisor within 24 hours to verify affected soil has been excavated. All equipment used to excavate affected soil shall be cleaned. The SPCC Coordinator will arrange for petroleum-contaminated soil to be removed from the site in a timely manner.

For large releases that cannot be contained by on-site personnel, the facility will contact a local emergency response contractor. The SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) will contact a disposal company for hazardous material recovery and removal. Recovered materials will be labeled, characterized, and disposed/recycled in accordance with applicable federal, state, and local regulations. JSI Construction Group LLC, subcontractor, or Pike Solar employees may not transport waste away from the facility or on a public road.

6.3 Incidental Releases

Incidental releases resulting from transfer operations are to be cleaned up by JSI Construction Group LLC, subcontractor, or Pike Solar employees using an appropriate absorbent at the time of the release. For the purposes of this SPCC Plan, an incidental release is defined as a small release of oil which can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area. Absorbent materials are located at the facility for this purpose. Notification is not required for incidental releases. Releases completely within a secondary containment structure are considered incidental releases.

Any release that poses an imminent danger, involves injured personnel, reaches a wash, creek, or stream; or is not contained by a secondary containment basin or diversionary structure, *regardless of quantity*, is not considered an incidental release and must be reported to the SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations).

7 RELEASE NOTIFICATION [§112.7(A)(4)]

This section discusses the reporting procedures for spills of oils at the facility. The personnel and organizations that are notified vary depending on the quantity and frequency of the spill and whether it reaches navigable waters or adjoining shorelines. A spill notification contact list is provided in Appendix E.

A spill event is defined as a discharge of a reportable quantity of oil that violates applicable water quality standards, causes a sheen on the water, or causes a sludge or emission to be deposited beneath the surface of the water or upon adjoining shorelines. A spill is further defined as 25 gallons or more, per the Basic Information for Handling Hazardous Wastes, Colorado Department of Public Health and Environmental (CDPHE), Division of Hazardous Materials and Waste Management (CDHMWM), or 42 gallons or more in two discharges within a 12-month period, per EPA directive (40 CFR 112.4(a)), that escapes secondary containment.

7.1 General Procedures for All Spills

The facility Site Manager is directly charged with reporting all oil spills that result from facility operations as follows:

- Secure the area to protect all personnel and public from any immediate danger.
- Attempt to contain the spill with equipment from the appropriate spill kit (if it is safe to do so).
- Call the Colorado Environmental Release and Incident 24-Hour Reporting Line at (877) 518-5608.
- Contact your manager.
- Immediately contact the SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) and report the situation and status.
- Continue to secure the area until all danger has been removed.
- Call Local Spill Response Contractor, such as Cardno, Inc. in Denver, at (720) 257-5800.

Remember:

The SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) is not a replacement for calling the Colorado Environmental Release and Incident 24-Hour Reporting Line at (877) 518-5608.

An employee should always call (877) 518-5608 or Cardno, Inc at (720) 257-5800 if a spill:

1. Threatens human health or safety; and/or
2. Cannot be controlled, is continuous, spreading, or has reached water.

An employee should use his judgment in calling (877) 518-5608. If in doubt, call (877) 518-5608.

7.2 Colorado Spill Reporting Requirements

A spill is defined as 25 gallons or more per CDHMWM. Any suspected release of an unknown quantity is a reportable quantity unless it can be shown conclusively that the release was less than the reportable quantity. Spills should be reported to Colorado Department of Labor and Employment (CDLE) Division of Oil and Public Safety (CDOPS) within 24 hours of an event via telephone or facsimile. If outside normal working hours or on a weekend or holiday and emergency assistance is needed, the release can be reported to the Colorado Environmental Release and Incident Reporting Line (or Colorado 24-Hour Environmental Spill Reporting Line) at CDPHE. The Site Manager is responsible for determining if a spill is to be reported to a regulatory agency.

Release reporting numbers are listed below:

- CDOPS's 24-Hour Reporting Telephone Number: 303-318-8547
- CDOPS's 24-Hour Reporting Facsimile Number: 303-318-8546
- Colorado Environmental Release and Incident
24-Hour Reporting Line 877-518-5608

7.3 Verbal Notifications to Federal Agencies

The National Response Center (NRC) will be verbally notified following a discharge of oil *of any quantity* that meets *any* of the following conditions:

- Violates applicable water quality standards,
- Causes a film or sheen upon or discoloration of the surface of navigable waters. (e.g., a wash, creek, or stream) or adjoining shorelines, or
- Causes a sludge or emulsion to be deposited beneath the surface of navigable waters or upon adjoining shorelines.
- Notifications are to be made as soon as possible, but no later than 24 hours after a reportable release is identified.

The telephone number for NRC notifications is 800-424-8802.

7.4 Information to Provide during Verbal Notifications

When notifying a government agency of a release, the following information should be gathered as soon as possible and provided:

1. Name and location of the facility.
2. Specific location where the oil discharge occurred.
3. Your name, position, and telephone number.

4. Date and time of the oil discharge.
5. Information on the oil discharge:
 - Type of material discharged (e.g., insulating oil),
 - Source of discharge (e.g., transformer),
 - Estimated total quantity discharged, including the estimated total quantity of oil discharged to navigable waters or adjoining shorelines,
 - Cause of discharge,
 - Affected media (e.g., soil, surface water),
 - Damages or injuries caused by the discharge,
 - Response actions being used to stop, contain, or clean-up the discharge,
 - Whether the discharge has been stopped, and
 - Whether an evacuation may be needed.
6. Names of other individuals or agencies that were contacted.

Record the following information when making a notification:

- Name and position of person contacted.
- Agency contacted.
- Date and time of notification.
- Information provided to agency.

7.5 Written Notifications to Government Agencies

In addition to verbal notifications, written follow-up reports may need to be submitted to the State, and Federal agencies.

7.6 Written Notifications to Federal Agencies

A spill report will be submitted to the EPA Region 8 Administrator if either of the following conditions are met:

- A single discharge of more than 1,000 gallons of oil which could reasonably be expected to discharge into or upon *navigable waters or adjoining shorelines* in a single event.
- A discharge of more than 42 gallons of oil in each of two events within any 12-month period which could reasonably be expected to discharge into or upon *navigable waters or adjoining shorelines*.

The spill report to EPA must be submitted *within 60 days of the release* and contain the following information:

- Name of the facility.
- Name of the owner/operator of the facility.
- Location of the facility.
- Maximum storage or handling capacity of the facility and normal daily throughput.
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements.
- An adequate description of the facility, including maps, flow diagrams, and topographic maps, as necessary.
- The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred.
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence.
- Such other information as the EPA Regional Administrator may reasonably require pertinent to the SPCC Plan or discharge.

7.7 Incident Termination

Once a release has been contained and cleaned-up, and any required verbal notifications have been made, the SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) will take the following actions:

1. If the spill was a reportable release, complete the spill report form in Appendix E and file it with the SPCC Plan in the General Office.
2. Verify that spill response equipment has been re-stocked.
3. Verify that the used oil is properly containerized, labeled, and stored for disposal.
4. Review the cause of and response to the release with supervisors, witnesses, and contractors, if appropriate. Determine additional requirements necessary to prevent recurrence of the incident. Amend the SPCC Plan, if necessary (refer to Section 4.2).

8 EVALUATION OF DISCHARGE POTENTIAL [§112.7(B), (C) & (D)]

8.1 Potential Discharge Volumes

For potential releases due to containment failure, it is conservatively assumed that the worst-case scenario would result in the entire contents of a container being released within one hour. Container contents, volumes, secondary containment systems, as well as the resultant flow direction, are discussed in Section 8.2 and/or listed in Appendix D.

8.2 Direction of Flow [§112.7(b)]

Predictions of the direction of flow from a release are shown in Figures 3 through 5, and described below:

8.2.1 Off-Site

Generally, not much off-site drainage enters the solar facility. All Areas (1 through 8) are located at a local high spot and no surface runoff enters into the site. Runoff from the site all drains to Williams Creek and its unnamed tributaries or washes near the solar site.

8.2.2 On-Site

The ground surface within the site slopes gently towards varying directions, as shown in Figures 3 through 5. There are no surface water bodies present within the site. However, Williams Creek and its unnamed tributaries are located near the solar site.

8.3 Discharge Containment [§112.7(c)]

Methods of spill containment at this facility include a combination of control structures and land-based spill response equipment to prevent oil from reaching navigable waters.

8.3.1 Containment and Diversionary Structures

Secondary containment and diversionary structures for the Pike Solar facility include:

- Spill pallets
- Sorbent materials
- Drip pans
- Concrete pads with surrounding containment through grading

8.3.2 *Spill Response Equipment*

Spill response equipment available to the facility includes:

- PPE (gloves, boots, coveralls)
- Shovels and brooms
- Dust pans
- Trash bags
- Tape
- Barrel
- Absorbent materials (Oily-Dry, socks, pads, rags, etc)

8.4 Practicability of Secondary Containment [§112.7(d)]

As described in Section 5.3, only two double-walled aboveground storage tanks with a combined total capacity of up to 1,000 gallons will be used during the construction phase of the facility. These two double-walled tanks will be removed from the site at the end of construction. All permanent oil-containing storages are operational oil-filled transformers. These transformers will be installed on concrete pads with surrounding containment through grading. In addition, the facility will adhere to the written procedures identifying measures described in Section 6.1. The facility'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 2.0 of this SPCC Plan.

8.5 Alternative Requirements to General Secondary Containment for Qualified Oil-Filled Equipment [§112.7(d)]

Oil-filled equipment at the facility has met the general secondary containment requirements of §112.7(c) through the implementation of active containment controls such as using sorbent materials during spill response activities to prevent the material from reaching a navigable waterway.

9 INSPECTION, TESTS, AND RECORDS [§112.7(E)]

External visual inspections of oil storage containers, spill kits, and general housekeeping are generally conducted on a monthly schedule. However, the inspection schedule frequency may vary based on the potential for a release from an oil-filled equipment to reach navigable waters, frequency of potential interaction between storm water and petroleum products, and the frequency of oil-filled equipment usage.

The inspection schedule and inspection checklists are in Appendix F and will be maintained for a minimum of 3 years by the SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations). If deficiencies in equipment or in procedures are discovered during the inspections, they will be recorded on the checklist and relayed to the appropriate Supervisor. Signed and dated inspection checklists are maintained with the SPCC Plan. The SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) is responsible for ensuring that deficiencies noted on the checklist are addressed and that corrective actions are noted. The storage container inspection frequency for the facility is described in the following sections.

9.1 Daily Inspections

Pike Solar personnel will perform daily inspections of their work area on each shift, if the area is operational. This daily visual inspection will include:

- Tank/piping/valve damage or leakage,
- Stained or discolored soils or concrete containment areas,
- Excessive accumulation of water or solution in containment areas, and
- Spill containment supplies (in the event that supplies are used)

The daily inspections will not include written inspection reports; however, if releases or potential release hazards are observed, the SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) will be contacted.

Daily inspections may only apply to the construction phase of the project. After construction is complete, the two temporary fuel tanks will be removed from the site.

Following construction, during normal operations of the facility, generally no employees will be onsite. Daily inspections will not be necessary at the facility.

9.2 Monthly Inspections

Monthly visual inspections will be conducted for bulk oil storage containers (e.g., tanks) during the construction phase of the project and are necessary to serve as the environmental equivalence of

integrity testing (refer to Section 16.6) for qualifying containers until the two temporary tanks are removed from the site. Containers inspected monthly include all bulk oil storage containers at the Pike Solar facility, identified in Appendix D.

The following is a description of items that will be monitored during the inspection.

Spill Containment Areas

- Integrity of the containment/diked areas has not been compromised through the presence of cracks, erosion, or other similar problems
- Evidence of oil
- Debris and vegetation
- Standing water
- Leaks in valves or other piping
- Structural integrity of bulk containers
- Spill containment equipment nearby bulk containers

In addition to visual inspections of bulk containers, employees are trained to look for potential oil-related problems on a day-to-day basis in their respective work areas and to report these to their Supervisor or the SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations).

Following construction, during normal operations of the facility, generally no employees will be onsite. Monthly inspections will not be necessary at the facility.

9.3 Quarterly Inspections

Visual inspections will be performed on a quarterly basis for operational-use containers, which include the oil-filled transformers and security provisions. The following is a description of items that will be monitored during inspections.

Oil-Filled Equipment

- The outside of each piece of oil-containing equipment for signs of rust or deterioration
- Supports and foundations for evidence of deterioration
- Spill control equipment is stored in designated locations

Security

- Fences and gates are secured

The SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) or Operations Manager will accompany the Pike Solar personnel responsible for oil-filled equipment routine inspections on an annual basis.

9.3.1 Certified Inspections

Certified Inspections are not required at the Pike Solar facility because there are no field erected steel tanks with a storage capacity greater than 50,000 gallons that could potentially discharge to navigable waters.

9.4 Recordkeeping

Inspection records and other documentation related to oil release prevention, such as training records, corrective actions, spill reports, and maintenance records are maintained with the SPCC Plan. The SPCC Coordinator (Brian Vickers during construction, and Sisay Dibabu during operations) is responsible for ensuring that records are properly filed and retained for at least three years.

10 EMPLOYEE TRAINING [§112.7(F)]

Oil handling personnel are trained at least annually in the operation and maintenance of equipment to prevent discharges of oil. In addition, informal briefings are held annually throughout the year to update employees on changes in the regulations, laws, or in-house procedures. At a minimum, an annual refresher/discharge prevention briefing will be held and documented. New hires that work in areas covered by the SPCC Plan are provided SPCC training during new employee orientation.

The Pike Solar facility has complementary training programs that address the proper handling of oil, hazardous materials, and waste that are present at the facility. The training programs meet the employee training requirements of federal and state regulations as they apply to the contingency plan and emergency response training.

Common topics covered in applicable training programs may include:

- Identification of hazards,
- Identification of reportable quantities,
- Emergency response measures,
- Release notification procedures,
- Disposal procedures for spilled materials,
- Housekeeping and materials management,
- Hazard communication,
- Awareness training for physical hazards in the workplace, including health effects of chemicals,
- Routine, daily operations in the handling and storage of oil and hazardous materials to prevent discharges (spills),
- Environmental rules, laws, regulations, and codes affecting the facility with respect to the storage and handling of oil and hazardous materials, and
- Contents of this SPCC Plan.

On-the-job update training is provided to facility personnel handling petroleum whenever there is a change in equipment or procedures relating to any element of this SPCC Plan, or an incident resulting in the release of oil.

10.1 Safety Meetings

The ongoing training program serves to update as well as reinforce the importance of proper operation, maintenance, cleanup, and safety procedures. Ongoing safety and operations training are to be provided through regular meetings. These meetings are mandatory for all personnel involved in facility operations that involve the use of oil and petroleum products.

The safety meeting must highlight and describe known discharges or failures, equipment malfunctions, and any recently developed precautionary measures implemented. Additional topics should be provided by management and supplemented with suggestions from operations and maintenance personnel.

Meetings are held periodically (e.g., monthly during construction and annually during operation or every time before major maintenance work) to instruct the employees in operation techniques and known safety hazards in order to maintain a high level of safety awareness. Records of meeting attendance and the topics covered/discussed are kept at the facility.

Training records are maintained for a minimum of 5 years. Sign-in sheets and topics of discussion at each briefing are maintained for documentation.

11 SECURITY [§112.7(G)]

Visiting personnel are not allowed into the facility unless accompanied by an authorized JSI Construction Group LLC or Pike Solar employee. Only authorized, trained personnel are allowed into areas where chemicals are stored. Similarly, only authorized, trained personnel are allowed to handle materials during material transfers.

11.1 Fencing

The facility is surrounded by a 6-foot high chain link perimeter fence with fabric and high-visibility wire extending 1-foot from the top of the fence.

11.2 Site Inspection

During normal operations, the facility will be visited periodically by O&M personnel.

11.3 Valves

Master flow, drain and any other valves that permit flow of oil out of oil-filled equipment are kept locked in the closed position when in a non-operating, non-standby mode. All outward flow control valves associated with oil-filled equipment are within a secure area (i.e., restricted public access) and are accessible only by authorized personnel.

11.4 Pipeline Connections

There are no pipeline connections associated with the majority of bulk storage tanks at the facility. The gasoline and diesel tanks will be equipped with a fill pipe that remains capped and closed except when being filled and fill nozzles that will be regularly inspected to prevent vapors and fumes from escaping as well as liquid product.

11.5 Lighting

Permanent lighting will be installed at each power station, the utility shed and within the substation. The lighting consists of motion-activated and switch-activated flood lights. Outside lighting is on poles within the O&M area. Lighting is designed to provide minimum illumination needed to achieve objectives and not emit excessive light to the night sky by focusing desired light in a downward direction. Lighting will not be erected within the solar array field; however, truck-mounted lights may be used at night for maintenance or to provide security measures when needed. Adequate lighting will be provided, as needed, at oil-filled equipment locations if oil management is required during non-daylight hours.

12 LOADING AND UNLOADING RACKS [§112.7(H)]

There are no tank car and/or tank truck loading/unloading racks at the facility; therefore, the requirements of §112.7(h) do not apply.

13 BRITTLE FRACTURE EVALUATION [§112.7(l)]

There are no field-erected aboveground containers at the facility; therefore, the requirements of §112.7(i) do not apply.

14 CONFORMANCE WITH REGULATIONS [§112.7(J)]

This SPCC Plan was prepared and implemented in compliance with the Oil Pollution Prevention regulations set forth in 40 CFR 112 using sound engineering practices, including applicable industrial standards.

15 FACILITY DRAINAGE [§112.8(B)]

Bulk storage containers are located where a release would be contained within berm-like structures to limit releases.

16 BULK STORAGE CONTAINERS [§112.8(C)]

After the construction of the project is complete, the Pike facility will have only oil-filled transformers. There are no bulk storage containers. Therefore, the requirements of §112.8(c) do not apply.

However, during the construction phase, two portable double-walled gasoline/diesel tanks with a total capacity of less than 1,000 gallons will be used in the project staging areas. These tanks will be removed from the solar site following construction. The tanks will be used temporarily and have a small total capacity; moreover, daily/monthly inspections of the two tanks will be performed; and the release response procedures as described in Section 6 will be implemented. Therefore, these two tanks can be waived from the requirements of this section.

17 PORTABLE OIL STORAGE CONTAINERS [§112.8(C)(11)]

After the construction of the project is complete, there will be no portable oil storage containers in use at the Pike Solar facility; therefore, the requirements of §112.8(c)(11) do not apply.

However, two portable gasoline/diesel tanks with a total capacity of less than 1,000 gallons will be in use in project staging areas. The double-walled tanks will be provided with a sufficient means of secondary containment.

18 FACILITY TRANSFER OPERATIONS [§112.8(D)]

After the construction of the project is complete, there will be no transfer operations at the Pike Solar facility; therefore, the requirements of §112.8(d) do not apply.

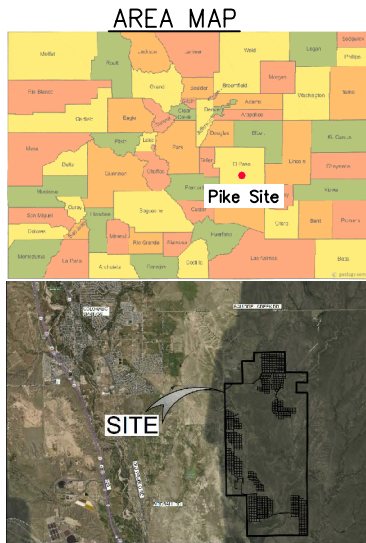
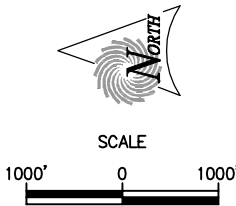
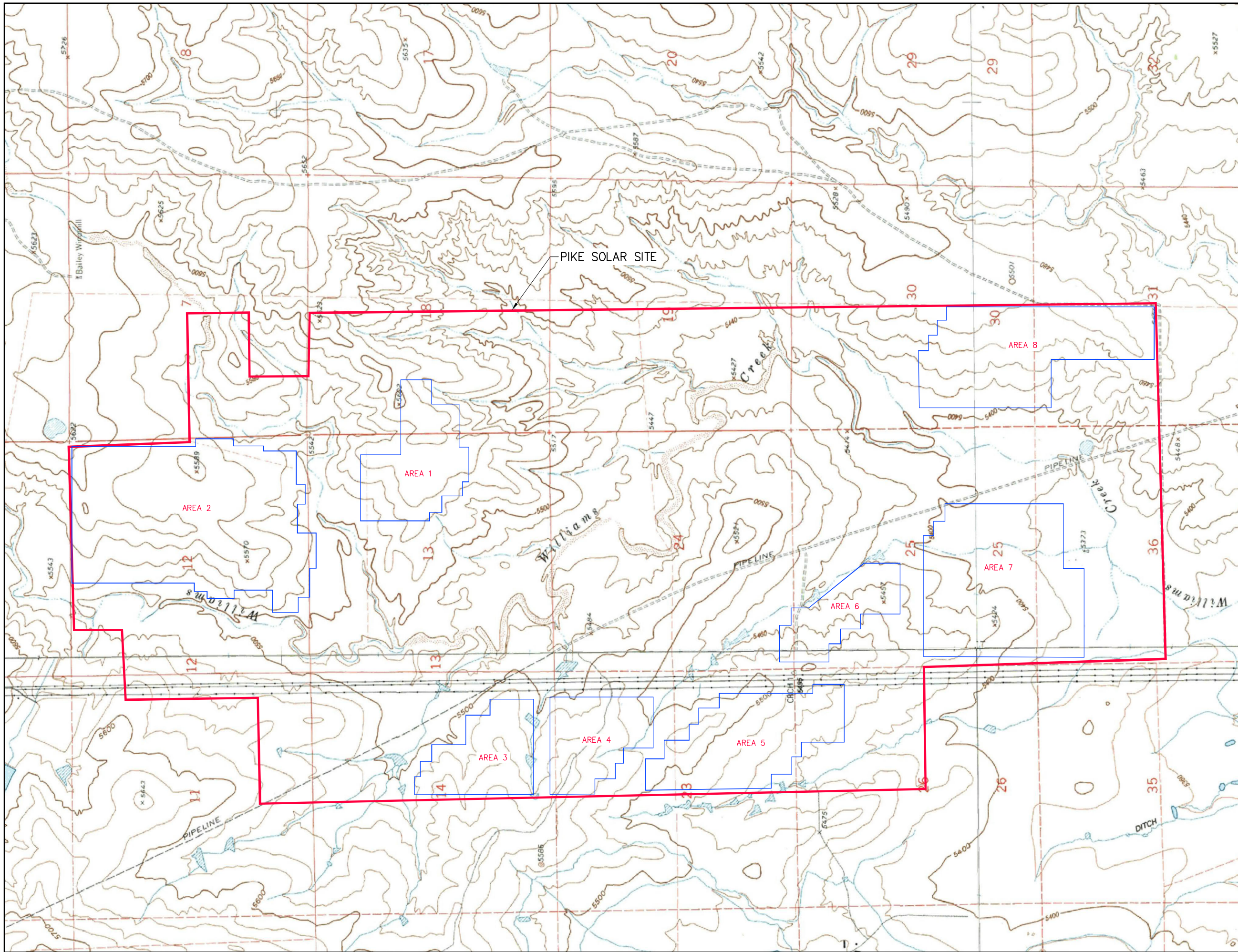
However, during the construction phase, two portable tanks will be used in the staging areas. The total capacity of the two tanks will be less than 1000 gallons. Generally, the only aboveground piping at the Pike Solar facility will be associated with the fuel unloading operations conducted adjacent to the bulk storage containers. Any spill resulting from product transfer or equipment failure would remain within the immediate area through the employment of appropriate absorbent materials or temporary containment.

Petroleum products will be delivered to the site via tanker trucks. The tanker truck driver and the JSI Construction Group LLC or contractor's responsible person will be outside during the entire transfer operation. Loading/unloading operations will be manually executed via shut off valves requiring continuous operator attention. All drains and outlets of the tanker truck will be visually inspected by drivers prior to filling and departure from the loading or unloading areas. Any minor drips and/or spills will be immediately cleaned up. All petroleum products delivered to tanks will follow the Tank Filling Procedure in Appendix G.

If an uncontrolled spill occurs from uncontained tanks, loading/unloading operations, or from other areas that escape containment, JSI Construction Group LLC personnel or contractor's responsible person will immediately begin mitigation measures to expeditiously control and remove any harmful quantity of oil discharge in accordance with procedures described in Section 6.1. As appropriate, absorbent materials or temporary containment berm secondary containment systems will be utilized to retain an uncontrolled spill onsite.

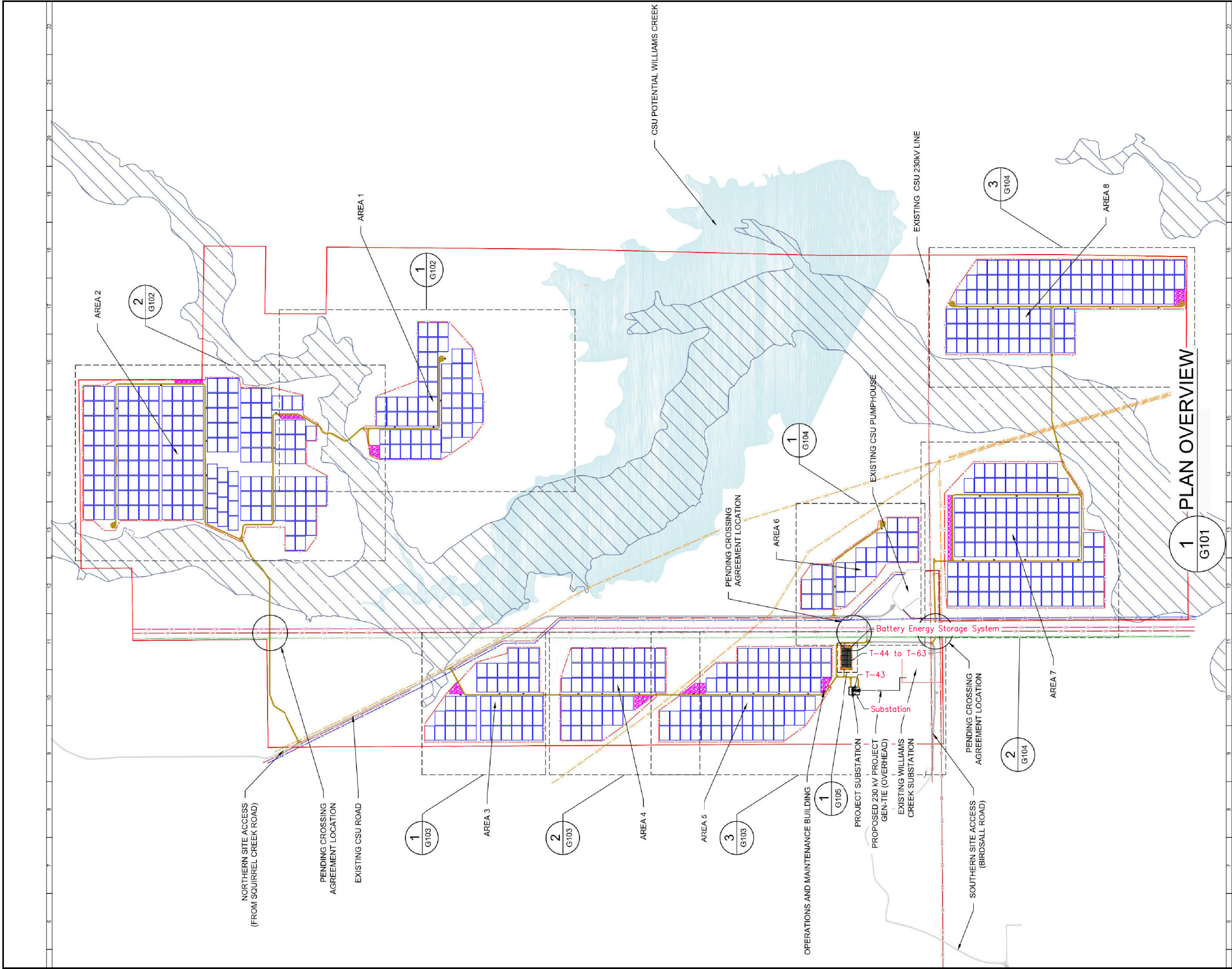
As applicable, all aboveground valves, piping, and appurtenances will be regularly inspected along with the containers as described in Section 9.1 of this SPCC Plan.

Figures



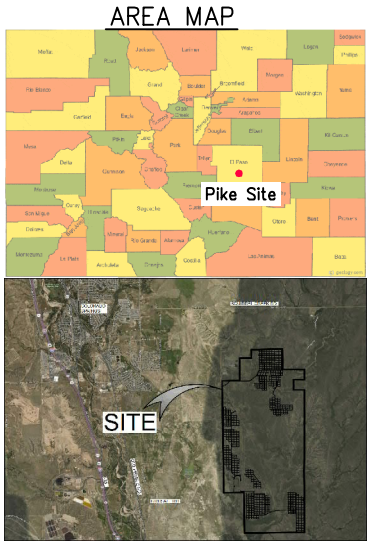
REV. NO.	COMMENT	DATE
<div><div>FOR REVIEW ONLY NOT FOR CONSTRUCTION DATE</div><div>SUNRISE ENGINEERING 6875 SOUTH 900 EAST SALT LAKE CITY, UTAH 84047 TEL 801.523.0100 FAX 801.523.0990 www.sunrise-eng.com</div></div>		
JSI CONSTRUCTION GROUP LLC		
PIKE SOLAR SPCC PLAN SITE VICINITY MAP		
SEI NO. 07849	DESIGNED DQY	DRAWN DQY
CHECKED DSA	SHEET NO. 01 of 05	FIG. 1

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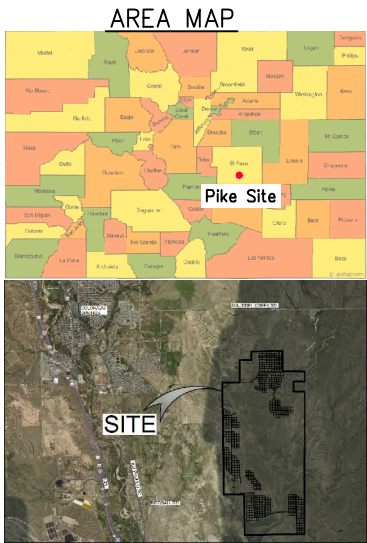
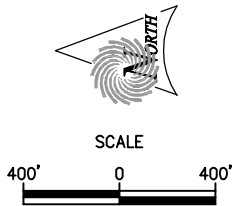
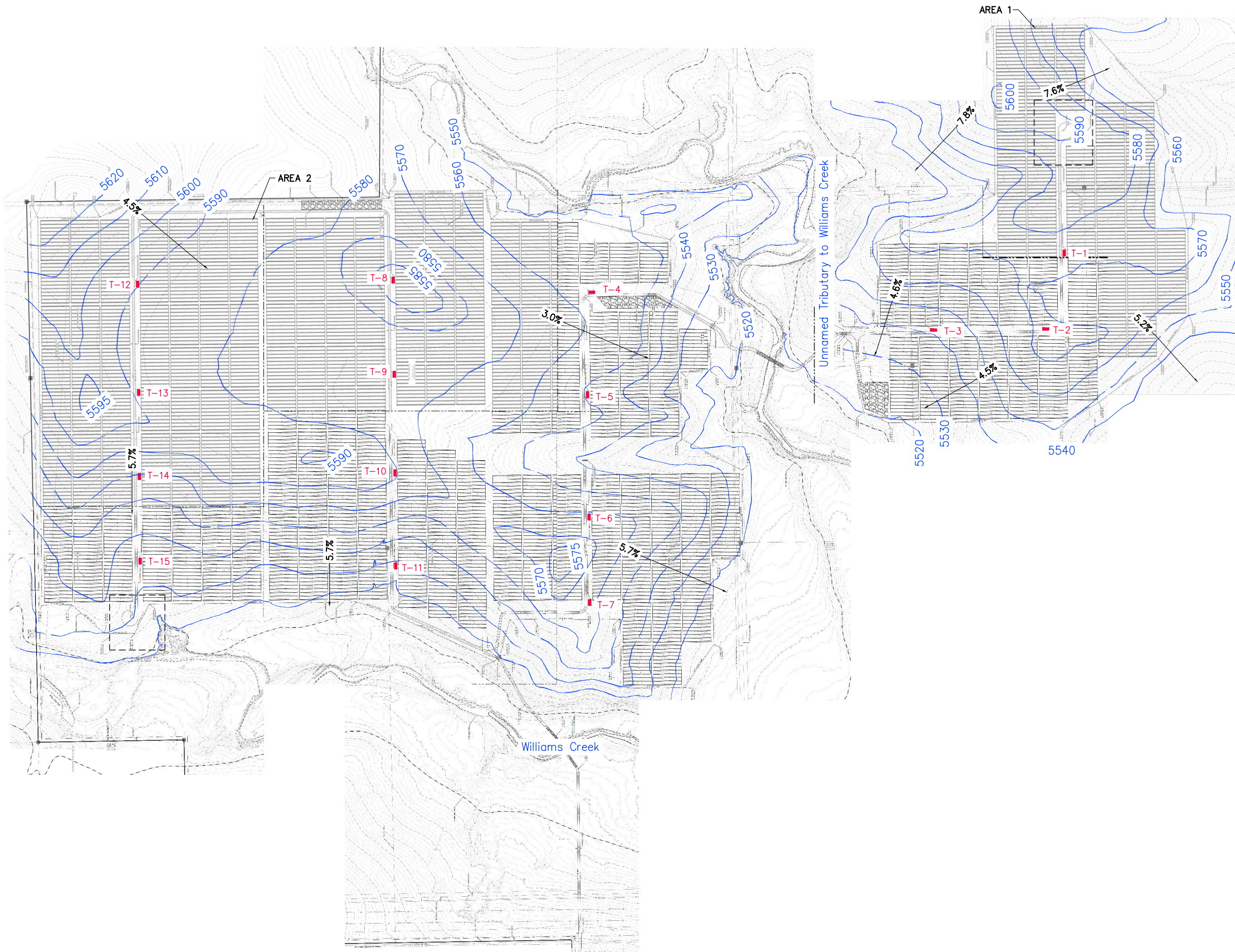
GENERAL NOTES	
1	COORDINATES ARE IN NAD83 COLORADO STATE PLANE, CENTRAL ZONE, US FT.
2	PROPERTY DESCRIPTION: 1162 ACRES INSIDE PROJECT FENCE, SECTIONS 6, 7, 18, 30 AND 31 T16S, R64W, AND SECTIONS 1, 11-14, 23-26, 35 AND 36 T16S, R65W
3	NORTH ARROW CORRESPONDS TO TRUE NORTH AT SITE, NOT SURVEY NORTH


LEGEND	
	CSU PARCEL BOUNDARY
	PROJECT FENCE
	SITE ACCESS ROAD (TYP 16' WIDE)
	EXISTING CSU ROAD
	GENERAL LAYDOWN AREA
	TRACKER ARRAY OUTLINE
	EXISTING OH TRANSMISSION LINE - 115KV
	EXISTING OH TRANSMISSION LINE - 230KV
	EXISTING OH TRANSMISSION LINE - 345 KV
	EXISTING UG FIBER OPTIC LINE
	EXISTING UG WATER LINE
	EXISTING NATURAL GAS LINE
	PROPOSED OH GEN-TIE LINE - 230KV
	POWER STATION
	FEMA FLOOD ZONE
	TRACKING ARRAY BLOCK



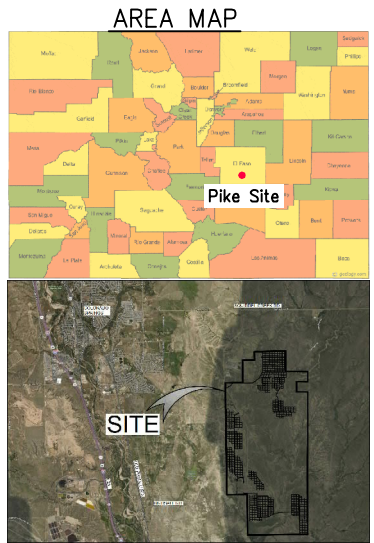
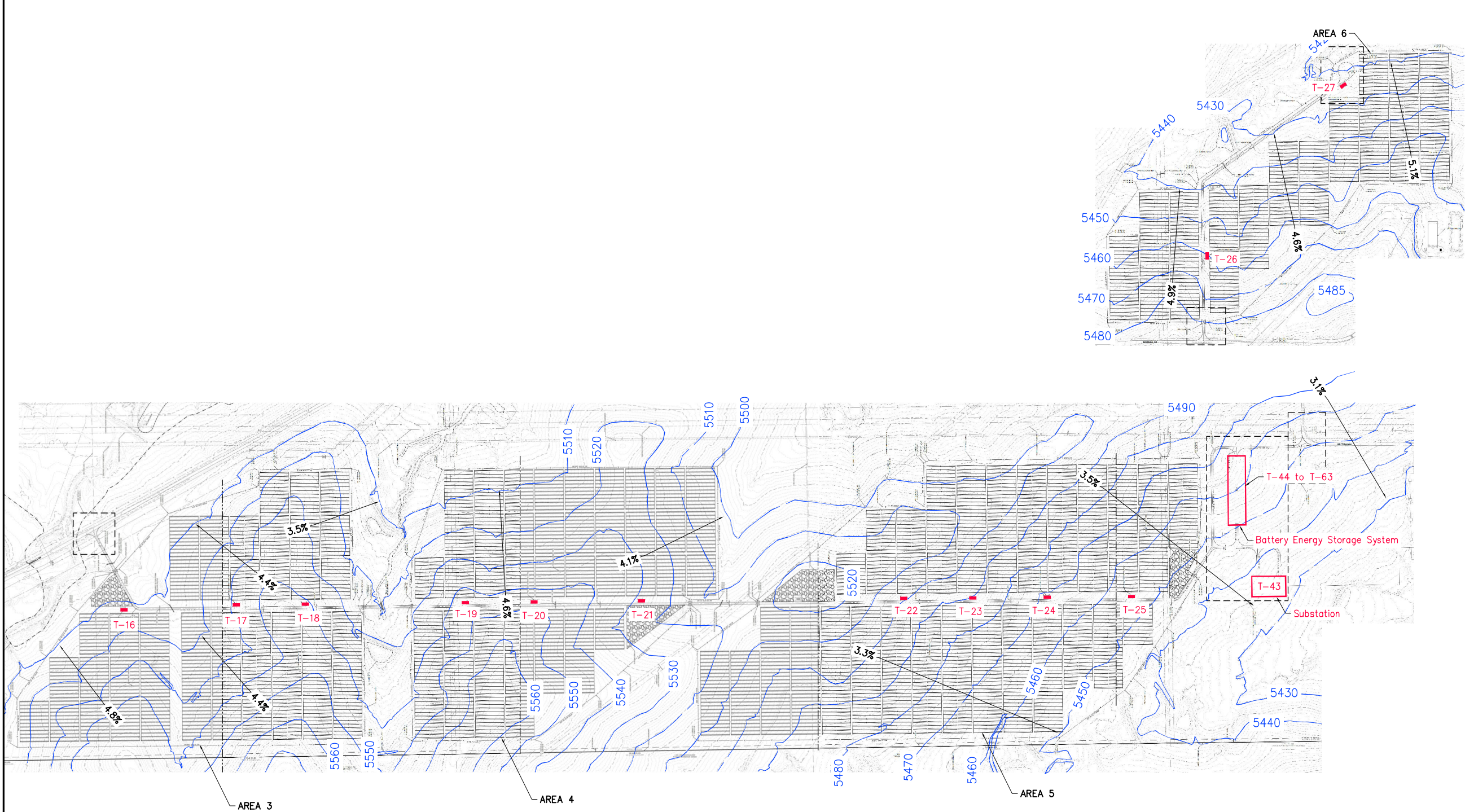
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JSI CONSTRUCTION GROUP LLC		
PIKE SOLAR SPCC PLAN SITE PALN		
SEI NO. 07849	DESIGNED DQY	DRAWN DQY
CHECKED DSA	SHEET NO. 02 of 05	FIG. 2


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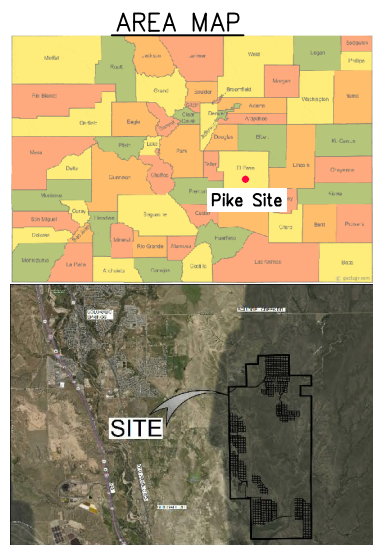
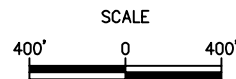
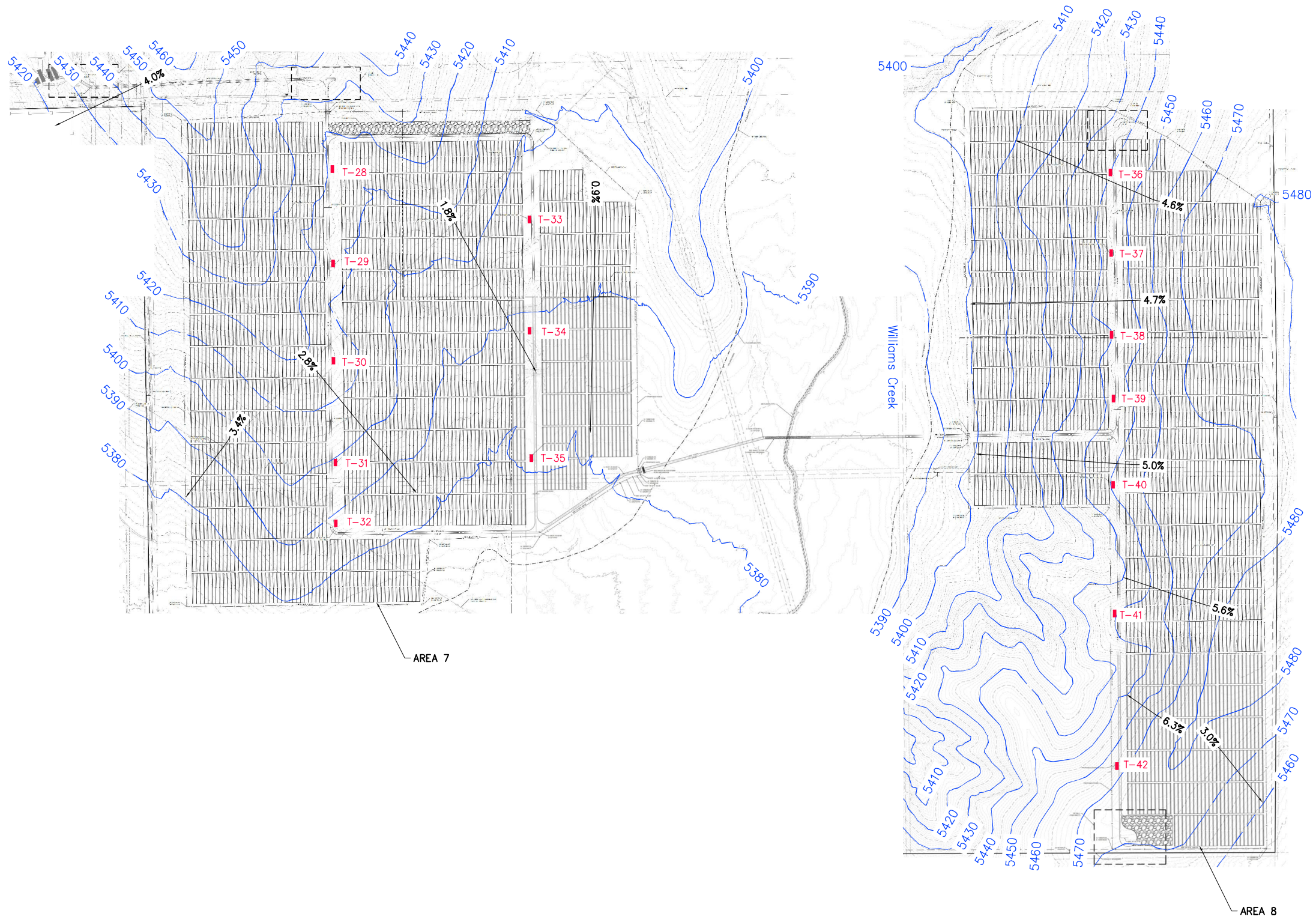
REV. NO.	COMMENT	DATE
<div><div>FOR REVIEW ONLY NOT FOR CONSTRUCTION DATE</div><div>SUNRISE ENGINEERING 6875 SOUTH 900 EAST SALT LAKE CITY, UTAH 84047 TEL 801.523.0100 FAX 801.523.0990 www.sunrise-eng.com</div></div>		
JSI CONSTRUCTION GROUP LLC		
PIKE SOLAR SPCC PLAN SITE MAP - AREAS 1 & 2		
SEI NO. 07849	DESIGNED DQY	DRAWN DQY
CHECKED DSA	SHEET NO. 03 of 05	FIG. 3


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REV. NO.	COMMENT	DATE
<div><div>FOR REVIEW ONLY NOT FOR CONSTRUCTION DATE</div><div>SUNRISE ENGINEERING 6875 SOUTH 900 EAST SALT LAKE CITY, UTAH 84047 TEL 801.523.0100 FAX 801.523.0990 www.sunrise-eng.com</div></div>		
JSI CONSTRUCTION GROUP LLC		
PIKE SOLAR SPCC PLAN SITE MAP - AREAS 3, 4, 5 & 6		
SEI NO. 07849	DESIGNED DQY	DRAWN DSA
CHECKED DSA	SHEET NO. 04 of 05	FIG. 4

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REV. NO.		COMMENT			DATE
<div>FOR REVIEW ONLY NOT FOR CONSTRUCTION DATE</div>		 SUNRISE ENGINEERING			
		6875 SOUTH 900 EAST SALT LAKE CITY, UTAH 84047 TEL 801.523.0100 FAX 801.523.0990 www.sunrise-eng.com			
JSI CONSTRUCTION GROUP LLC					
PIKE SOLAR SPCC PLAN SITE MAP - AREAS 7 & 8					
SEI NO. 07849	DESIGNED DQY	DRAWN DQY	CHECKED DSA	SHEET NO. 05 of 05	FIG. 5

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Appendix A

Regulatory Requirement Cross-Reference Table

SPCC Regulation Cross-Reference Table
Spill Prevention, Control and Countermeasure Plan
Pike Site, El Paso County, Colorado

Requirement	SPCC Reference Section	NA
<u>§112.3 Requirement to prepare and implement a Spill Prevention, Control and Countermeasure Plan</u>		
(a)(1) Except as otherwise provided in this section, if your facility, or mobile or portable facility, was in operation on or before August 16, 2002 you must maintain your Plan, but must amend it, if necessary, to ensure compliance with this part and implement the amended Plan no later than November 10, 2011. If such a facility becomes operational after August 16, 2002 through November 10, 2011 and could reasonably be expected to have a discharge as described in §112.1(b), you must prepare and implement a Plan on or before November 10, 2011. If such a facility (excluding oil production facilities) becomes operational after November 20, 2011 and could reasonably be expected to have a discharge as described in §112.1(b) you must prepare and implement a Plan before you begin operations. You are not required to prepare a new Plan each time you move a mobile or portable facility to a new site; the Plan may be general. When you move the mobile or portable facility you must locate and install it using the discharge prevention practices outlined in the Plan for the facility. The Plan is applicable only while the mobile or portable facility is in a fixed (non-transportation) operating mode.	Section 1.1	
(2) If your drilling, production or work-over facility, including a mobile or portable facility, is offshore or has an offshore component; or your onshore facility is required to have and submit a Facility Response Plan pursuant to 40 CFR 112.20(a) and was in operation on or before August 16, 2002, you must maintain your Plan but must amend it, if necessary, to ensure compliance with this part and implement the amended Plan no later than November 10, 2010. If such a facility becomes operational after August 16, 2002 through November 10, 2010, and could reasonably be expected to have a discharge as described in §112.1(b), you must prepare and implement a Plan on or before November 10, 2010. If such a facility (excluding oil production facilities) becomes operational after November 10, 2010 and could reasonably be expected to have a discharge as described in §112.1(b) you must prepare and implement a Plan before you begin operations. You are not required to prepare a new Plan each time you move a mobile or portable facility to a new site; the Plan may be general. When you move the mobile or portable facility you must locate and install it using the discharge prevention practices outlined in the Plan for the facility. The Plan is applicable only while the mobile or portable facility is in a fixed (non-transportation) operating mode.		X
(3) If your farm, as defined in §112.2, was in operation on or before August 16, 2002, you must maintain your Plan, but must amend it, if necessary to ensure compliance with this part, and implement the amended Plan on or before May 10, 2013. If your farm becomes operational after August 16, 2002, through May 10, 2013, and could reasonably be expected to have a discharge as described in §112.1(b), you must prepare and implement a Plan on or before May 10, 2013. If your farm becomes operational after May 10, 2013, and could		X

Requirement	SPCC Reference Section	NA
reasonably be expected to have a discharge as described in §112.1(b), you must prepare and implement a Plan before you begin operations.		
(b) If your oil production facility, as described in paragraph (a)(1) of this section, becomes operational after November 10, 2011, or as described in paragraph (a)(2) of this section, becomes operational after November 10, 2010 and could reasonably be expected to have a discharge as described in §112.1(b), you must prepare and implement a Plan within six (6) months after you begin operations.		X
(d) Except as provided in §112.6, a licensed Professional Engineer must review and certify a Plan for it to be effective to satisfy the requirements of this part. (2) Such certification shall, in no way, relieve the owner or operator of a facility of his duty to prepare and fully implement such Plan in accordance with the requirements of this part.	Section 3	
(e) If you are the owner or operator of a facility for which a Plan is required under this section you must: (1) Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day or at the nearest field office if the facility is not so attended, and (2) Have the Plan available to the Regional Administrator for on-site review during normal working hours.	Section 4	
(f) Extension of time (1) The Regional Administrator may authorize an extension of time for the preparation and full implementation of a Plan or any amendment thereto. (2) If you are an owner or operator seeking an extension of time under paragraph (f)(1) of this section you may submit a written extension request to the Regional Administrator.		X
(g) Qualified Facilities. The owner or operator of a qualified facility, as defined in this subparagraph, may self-certify his facility's Plan as provided in §112.6. A qualified facility is one that meets the following Tier I or Tier II qualified facility criteria: (1) A Tier I qualified facility meets the qualification criteria in paragraph (g)(2) of this section and has no individual aboveground oil storage container with a capacity greater than 5,000 U.S. gallons. (2) A Tier II qualified facility is one that has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons or no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve (12) month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to this part, if the facility has been in operation in for less than three years (other than discharges as described in §112.1(b) that are the result of natural disasters, acts of war or terrorism) and has an aggregate aboveground oil storage capacity of 10,000 U.S. gallons or less.		X
<u>§112.4 Amendment of Spill Prevention, Control and Countermeasure Plan by Regional Administrator.</u>		
(a) Notwithstanding compliance with §112.3; whenever your facility has discharged more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b) or discharged more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b), occurring within any twelve month	Section 7	

Requirement	SPCC Reference Section	NA
period, submit the following information to the Regional Administrator within 60 days from the time the facility becomes subject to this section. (1) Name of the facility; (2) Your name; (3) Location of the facility; (4) Maximum storage or handling capacity of the facility and normal daily throughput; (5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements; (6) An adequate description of the facility, including maps, flow diagrams and topographical maps, as necessary; (7) The cause of such discharge as described in §112.1(b), including failure analysis of the system or subsystem in which the failure occurred; (8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and (9) Such other information as the Regional Administrator may reasonably require.		
(c) Send to the appropriate agency, or agencies in charge of oil pollution control activities in the State in which the facility is located, a complete copy of all information you provided to the Regional Administrator.	Section 7	
(d & e) Regional Administrator requirements for SPCC Plan amendment		X
(f) Appeal of amendment by facility <u>§112.5 Amendment of Spill Preventions, Control and Countermeasure Plan by Owners and Operators</u>		X
(a) Amend the SPCC Plan for your facility when there is a change in the facility design, construction, operation or maintenance that materially affects its potential for a discharge.	Section 4.2.1	
(b) Complete a review and evaluation of the SPCC Plan at least once every five years. As a result of this review and evaluation you must amend your SPCC Plan within six months of the review.	Section 4.2.2	
(c) Except as provided in §112.6, have a Professional Engineer certify any technical amendments to your Plan.	Sections 4.2.1 and 4.2.2	
<u>§112.6 Qualified Facility Plan Requirements</u>		X
<u>§112.7 General Requirements for Spill Prevention, Control and Countermeasure Plans.</u>		
(First Paragraph):		
- Full approval of management with authority to commit resources`	Section 2	
- Discuss additional facilities or procedures, methods or equipment not yet fully operational.	Section 4.4	
- Plan follows sequence of §112.7, or is supplemented with a section cross-referencing the location of requirements.	Section 1 and Appendix A	
(a)		
(1) Include a discussion of your facility's conformance with the requirements listed in this part.	Section 1	
(2) Except as provided in §112.6, your plan may deviate from the requirements in paragraphs (g), (h)(2) and (3) and (i) of this section and the requirements in	Section 4.3	

Requirement	SPCC Reference Section	NA
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), 112.9(d)(3), 112.10(c), 112.12(c)(2) and 112.12(c)(11), 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 you must state the reasons for nonconformance in your Plan and describe, in detail, alternate methods and how you will achieve equivalent environmental protection.		
(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 fixed oil storage container and the storage area where mobile or portable containers are located. The facility diagram must identify the location of, and mark as “exempt” underground 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, including intra-facility gathering lines that are otherwise exempted from the requirements of this part under §112.1©(11).	Section 5.1, 5.2 and Figures 1, 2 and 3	
(i) The type of oil in each container and its storage capacity. For mobile or portable containers either provide the type of oil and storage capacity for each container or provide an estimate of the potential number of mobile or portable containers, the types of oil and anticipated storage capacities;	Section 5.3; Appendix D	
(ii) Discharge prevention measures including procedures for routine handling of products (loading, unloading and facility transfers, etc.);	Section 5.4	
(iii) Discharge or drainage controls such as secondary containment around containers and other structures, equipment and procedures for the control of a discharge;	Appendix D	
(iv) Countermeasures for discharge discovery, response and cleanup (both the facility’s capability and those that might be required of a contractor);	Section 6.0; Appendix E	
(v) Methods of disposal of recovered materials in accordance with applicable legal requirements;	Section 6.2	
(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.	Section 7; Appendix E	
(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 to relate the required information.	Section 7.2	
(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.	Section 6; Appendix E	
(b) Where experience indicates a reasonable potential for equipment failure, 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.	Section 8.1; Section 8.2; Appendix D	

Requirement	SPCC Reference Section	NA
(c) Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b), except as provided in paragraph (k) of this section for qualified oil-filled operational equipment and except as provided in §112.9(d)(3) for flowlines and intra-facility gathering lines at an oil production facility. 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, will not escape the containment system before cleanup occurs. In determining the method design and capacity for secondary equipment you need only to address the typical failure mode and the most likely quantity of oil that would be discharged. Secondary containment may be either active or passive in design. At a minimum, you must use one of the following prevention systems or its equivalent:	Section 8.3	
(1) For onshore facilities		X
(i) Dikes, berms or retaining walls sufficiently impervious to contain oil;		
(ii) Curbing or drip pans;		
(iii) Sumps and collection systems;		
(iv) Culverting, gutters or other drainage systems;		
(v) Weirs, booms or other drainage systems;		
(vi) Spill diversion ponds;		
(vii) Retention ponds; or		
(viii) Sorbent materials		
(2) For offshore facilities:		
(i) Curbing or drip pans;		X
(ii) Sumps and collection systems;		X
(d) Provided your Plan is certified by a licensed Professional Engineer (...), if you determine that the installation of any of the structures or pieces of equipment to prevent a discharge is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers conduct both periodic integrity testing of the valves and piping; and, unless you have submitted a response plan under §112.20, provide in your Plan the following:	Section 8.5	
(1) An oil spill contingency plan following the provisions in part 109 of this chapter		X
(2) A written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.		X
(e) 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 SPCC Plan for a period of three years.	Section 9; Appendix E	
(f) Personnel, training and discharge prevention procedures.	Section 10	
(1) At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure	Section 10	

Requirement	SPCC Reference Section	NA
protocols; applicable pollution control laws, rules and regulations; general facility operations and the contents of the facility SPCC Plan.		
(2) Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.	Section 10	
(3) Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility.	Section 10	
(g) Security (excluding oil production facilities). Describe in your Plan how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.	Section 11.1, 11.2, 11.3 and 11.5	
(h) Facility tank car and tank truck loading/unloading rack (excluding offshore facilities).		X
(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 containment of a tank car or tank truck loaded or unloaded at the facility.		X
(2) Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks or vehicle break interlock system in the area adjacent a loading/unloading rack to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.	Section 12	
(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.	Section 12	
(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 and, as necessary, take appropriate action.	Section 13	
(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 14	
(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.		X

Requirement	SPCC Reference Section	NA
<u>§112.8 Spill Prevention, Control and Countermeasure Plan Requirements for Onshore Facilities (excluding production facilities).</u>		
(a) Meet the general requirements for the Plan listed under §112.7 and the specific discharge preventions and containment procedures listed in this section.	<i>See individual requirements</i>	
(b) Facility drainage requirements.	Section 15	
(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.	Section 15	
(2) Use valves of manual, open-and-closed design for the drainage of diked areas.	Section 15	
(3) Design facility drainage systems from undiked areas with a potential for a discharge to flow into ponds, lagoons or catchment basins designed to retain oil or return it to the facility.	Section 15	
(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.		X
(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.		X
(c) Bulk storage containers.		
(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.	Section 16	
(2) Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) 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.	Section 16	
(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).	Section 16	
(iii) Open the bypass valve and reseal it following discharge under responsible supervision; and		
(iv) Keep adequate records of such events; for example, any records required under permits issued in accordance with §§112.41(j)(2) and 122.41(m)(3) of this chapter.		
(4) Protect any completely buried metallic storage installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible	Section 16	

Requirement	SPCC Reference Section	NA
with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.		
(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.	Section 16	
(6) Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections which take into account container size, configuration and design (such as containers that are shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled or partially buried). Examples of these integrity tests include, but are not limited to; visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing or other systems of non-destructive 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 satisfy the recordkeeping requirements of this paragraph.	Section 16; Appendix F	
(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.	Section 16	
(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:	Section 5.1	
(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.		
(9) Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).	Section 16	
(10) Promptly correct visible discharges which result in a loss of oil from the container including, but not limited to; seams, gaskets, piping, pumps,	Section 16	

Requirement	SPCC Reference Section	NA
valves, rivets and bolts. You must promptly remove any accumulations of oil in diked areas.		
(11) Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers and other non-transportation-related tank trucks 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.	Section 17	
(d) Facility transfer operations, pumping and facility process.		
(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.	Section 18	
(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.	Section 18	
(3) Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.	Section 18	
(4) Regularly inspect all aboveground valves, piping and appurtenances. During the inspection you must assess the general conditions 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.	Section 18; Section 9; Appendix F	
(5) Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.	Section 18	

Appendix B

Certification of Substantial Harm Determination

**CERTIFICATION OF THE APPLICABILITY OF
THE SUBSTANTIAL HARM CRITERIA CHECKLIST
Pike Solar, El Paso County, Colorado**

Facility Name: Pike Solar, El Paso County, Colorado Facility

Address: El Paso County, Colorado.

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 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 formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) 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 Appendix I, II and III to the DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.

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 formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility would shut down a drinking water intake²?

YES _____

NO __X__

5. Does the facility has 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 12,000 gallons within the last 5 years?

YES _____

NO __X__

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this 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

Title

Name (Please type or print)

Date

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

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

Appendix C

SPCC Plan Review Log

SPCC Plan Review Log
Pike Solar, El Paso County, Colorado

Plan Reviews

[illegible]

By signing this review log, the SPCC Plan reviewer certifies that the following statement is true on the date that it is signed:
 “I have completed a review and evaluation of the SPCC Plan for the Pike Solar, El Paso County, Colorado, and will (or will not) amend the plan as a result.”

Plan Revisions

[illegible]

Appendix D

Petroleum Storage Tanks, Containers and Oil-Filled Equipment Inventory

Bulk Container and Oil-Filled Equipment Inventory

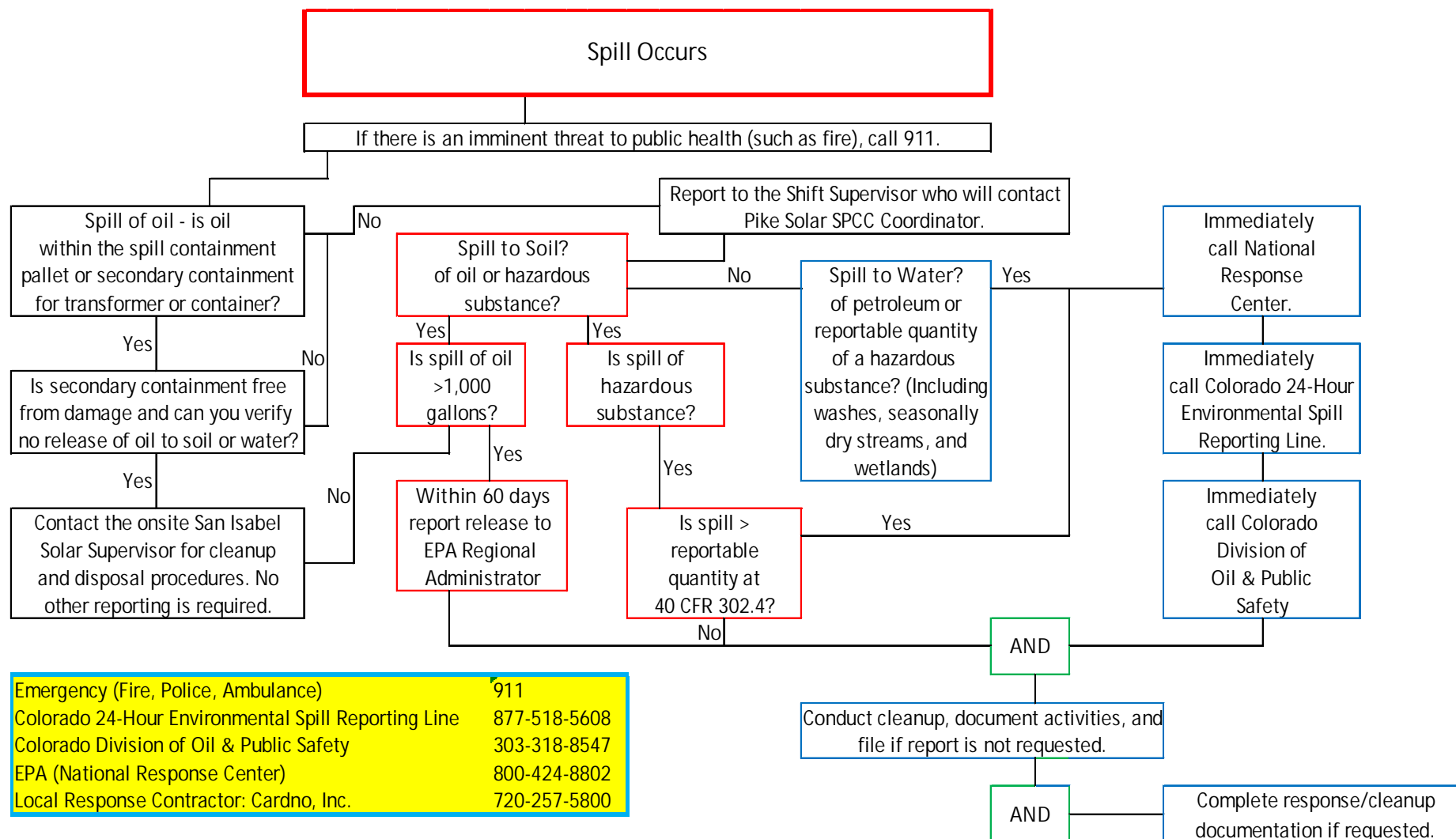
Pike Solar, El Paso County, Colorado

SPCC ID	Facility Area	Contents	Nominal Capacity (Gallons)	In Use? (Y/N)	Material of Container	Comments
T-1	Among Panels	Insulating Oil	892	Y/N	Steel	
T-2	Among Panels	Insulating Oil	892	Y/N	Steel	
T-3	Among Panels	Insulating Oil	892	Y/N	Steel	
T-4	Among Panels	Insulating Oil	892	Y/N	Steel	
T-5	Among Panels	Insulating Oil	892	Y/N	Steel	
T-6	Among Panels	Insulating Oil	892	Y/N	Steel	
T-7	Among Panels	Insulating Oil	892	Y/N	Steel	
T-8	Among Panels	Insulating Oil	892	Y/N	Steel	
T-9	Among Panels	Insulating Oil	892	Y/N	Steel	
T-10	Among Panels	Insulating Oil	892	Y/N	Steel	
T-11	Among Panels	Insulating Oil	892	Y/N	Steel	
T-12	Among Panels	Insulating Oil	892	Y/N	Steel	
T-13	Among Panels	Insulating Oil	892	Y/N	Steel	
T-14	Among Panels	Insulating Oil	892	Y/N	Steel	
T-15	Among Panels	Insulating Oil	892	Y/N	Steel	
T-16	Among Panels	Insulating Oil	892	Y/N	Steel	
T-17	Among Panels	Insulating Oil	892	Y/N	Steel	
T-18	Among Panels	Insulating Oil	892	Y/N	Steel	
T-19	Among Panels	Insulating Oil	892	Y/N	Steel	
T-20	Among Panels	Insulating Oil	892	Y/N	Steel	
T-21	Among Panels	Insulating Oil	892	Y/N	Steel	
T-22	Among Panels	Insulating Oil	892	Y/N	Steel	
T-23	Among Panels	Insulating Oil	892	Y/N	Steel	
T-24	Among Panels	Insulating Oil	892	Y/N	Steel	
T-25	Among Panels	Insulating Oil	892	Y/N	Steel	
T-26	Among Panels	Insulating Oil	892	Y/N	Steel	
T-27	Among Panels	Insulating Oil	892	Y/N	Steel	
T-28	Among Panels	Insulating Oil	892	Y/N	Steel	
T-29	Among Panels	Insulating Oil	892	Y/N	Steel	
T-30	Among Panels	Insulating Oil	892	Y/N	Steel	
T-31	Among Panels	Insulating Oil	892	Y/N	Steel	
T-32	Among Panels	Insulating Oil	892	Y/N	Steel	
T-33	Among Panels	Insulating Oil	892	Y/N	Steel	
T-34	Among Panels	Insulating Oil	892	Y/N	Steel	
T-35	Among Panels	Insulating Oil	892	Y/N	Steel	
T-36	Among Panels	Insulating Oil	892	Y/N	Steel	
T-37	Among Panels	Insulating Oil	892	Y/N	Steel	
T-38	Among Panels	Insulating Oil	892	Y/N	Steel	
T-39	Among Panels	Insulating Oil	892	Y/N	Steel	
T-40	Among Panels	Insulating Oil	892	Y/N	Steel	
T-41	Among Panels	Insulating Oil	892	Y/N	Steel	
T-42	Among Panels	Insulating Oil	892	Y/N	Steel	
T-43	Among Panels	Insulating Oil	892	Y/N	Steel	
T-44	Among Panels	Insulating Oil	892	Y/N	Steel	
T-45	Among Panels	Insulating Oil	892	Y/N	Steel	
T-46	Substation	Insulating Oil	11979	Y/N	Steel	
T-47	Battery Energy Storage System	Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-48		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-49		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-50		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-51		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-52		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-53		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-54		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-55		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-56		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-57		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-58		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-59		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-60		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-61		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-62		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-63		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-64		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-65		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-66		Insulating Oil	Unknown	Y/N	Steel	Anticipated <10000 gallons
T-67	Staging Areas (not shown in figures)	Diesel	Unknown	Y/N	Steel	Two portable tanks'
T-68		Gasoline	Unknown	Y/N	Steel	capacity <1000 gallons

Appendix E

Spill Reporting Matrix, Contact List and Spill Log

Spill Reporting Matrix and Contact List Pike Solar, El Paso County, Colorado



Spill Log
Pike Solar LLC

Discharge/Discovery Date:		Time:	
Facility Name:	Pike Solar Facility		
Facility Location:	El Paso County, Colorado		
Individual Name of Reporting:		Telephone Number:	
Type of Material Discharged:		Estimated Quantity:	
Source of Discharge:		Material Affected:	Soil
			Water
			Other
Actions Taken:			
Damage or Injuries	No Yes	Evaluation Needed:	No Yes
Organization and Individuals Contacted: (include dates and times)	National Response Center		
	Colorado 24-Hour Environmental Spill Reporting Line		
	Colorado Division of Oil & Public Safety		
	Facility Personnel		
	Local Contractor		
	Other		

Notes:

Complete all sections of this form. If section is not applicable, indicate so with "NA".

For spills of greater than 1,000 gallons of oil into navigable waters of the U.S. see Section 7.3.3 for additional EPA reporting obligations.

For 2 spills of 42 gallons or more into navigable waters of the U.S. within a 12-month period, see Section 7.3.3.

Appendix F

Inspection Form and Checklist

Inspection and Testing Frequency
Pike Solar, El Paso County, Colorado

SPCC ID	Facility Area	Contents	Nominal Capacity (Gallons)	Inspection Frequency	Integrity Testing Frequency	Last Integrity Testing Date
Transformer T-1 to T-45	Among Panels	Insulating Oil	892 each	Quarterly	N/A-Operational	N/A
Transformer T-46	Substation	Insulating Oil	11,979	Quarterly	N/A-Operational	N/A

Appendix G

Tank Filling Procedures

Tank Filling Procedures

Bulk tanks that may be vendor filled include the bulk gasoline and diesel tanks in the staging areas during the construction phase. Refueling will occur when contractor's responsible person or JSI Construction Group LLC personnel are present.

1. Vendors will sign in at guard gate and verify order to unload fuel.
2. Verify that tank has adequate volume to receive product.
3. Chock wheels or set parking brake.
4. Turn off engine unless engine is required for refueling tank.
5. Remove Cap and connect refueling lines
6. Open master flow control valve.
7. During refueling the operator is required to stay within sight of refueling starter control and be accompanied by JSI Construction Group LLC personnel or contractor's responsible person. In the event of a spill immediately stop refueling and report to JSI Construction Group LLC personnel. JSI Construction Group LLC personnel will follow spill response measures and utilize nearby spill response equipment to contain any spill within the immediate area.
8. Do not add fuel in excess of tank capacity.
9. Turn off master flow control valve before disconnecting lines.
10. Secure cap on refueling pipeline.