SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN FOR GREENE COUNTY HIGHWAY DEPARTMENT CLIFTON AVE. OPERATIONS FACILITY



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Plan Date 8/31/15

CERTIFICATION INFORMATION

NAME OF FACILITY:Clifton Avenue FacilityTYPE OF FACILITY:Road and Fleet MaintenanceDATE OF INITIAL OPERATION:March 10, 1961LOCATION OF FACILITY:2065 N. Clifton AvenueSpringfield, MO 65803Springfield, MO 65803NAME AND ADDRESS OF OWNER:Greene County Commission
933 N. Robberson Ave.
Springfield, MO 65802
(417) 868-4112

DESIGNATED PERSON(S) RESPONSIBLE FOR OIL SPILL PREVENTION

Jeff Deckard Safety Officer

Tim Davis – Environmental Compliance Manager

OIL SPILL HISTORY: None

MANAGEMENT APPROVAL:

Full approval is extended by Management at a level with authority to commit the necessary resources.

SIGNATURE:

Rick Artman, Highway Administrator

MANAGEMENT REVIEW PAGE SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

In accordance with 40 CFR 112.5(b) a review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, Greene County will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of the review. The Environmental Compliance Manager, or designee, will review the plan for conformance with current SPCC regulations. Greene County will amend the SPCC plan within six months after a change in the facility design, construction, operation, or maintenance occur which materially affects the facility's potential for discharge of oil into or upon navigable waters of the United States or adjoining shorelines.

Original Date of Plan: August 31, 2015

I have completed the review and evaluation of the Clifton Avenue Operations Facility SPCC Plan on the following date and have indicated below whether or not the Plan will be amended as a result of the review.

SIGNATURES

	Review Dates	Amend Plan? (Y/N)	Environmental Compliance Manager	Highway Department Safety Officer	Highway Department Administrator
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1.0 INTRODUCTION
2.0 FACILITY DESCRIPTION52.1 Facility Operations52.2 Facility Oil Storage52.3 Drainage Pathway92.4 Spill Prediction9
3.0 DISCHARGE PREVENTION MEASURES103.1 Drainage Control, Diversionary Structures, and Containment113.2 Bulk Storage Tanks/Secondary Containment113.3 Inspections, Maintenance, and Records153.4 Personnel, Training, and Discharge Prevention Procedures173.5 Security173.6 Facility Tank Car and Tank Truck Loading/Unloading Rack173.7 Facility Transfer Operations18
4.0 DISCHARGE COUNTERMEASURES184.1 Notifications/Emergency Contacts194.2 Immediate Response Activities204.3 Clean Up Activities234.4 Waste Disposal244.5 Spill Report25
TABLESTable 1: Clifton Oil Storage6Table 2: Bulk Oil Storage Units7Table 3: Discharge Potential10Table 4: Bulk Oil Storage Construction Details12
FIGURES Figure 1: Facility Map
APPENDICESAppendix A – Monthly Inspection and Corrective Action LogAppendix B – Spill Response Supplies and Equipment30Appendix C – Remediation Contractors31Appendix D – Internal Notification Call Out List32Appendix E – Oil Spill Report Form33Appendix F – Special Waste Disposal Request35Appendix G – Certification of the Applicability of the Substantial Harm Criteria Checklist

TABLE OF CONTENTS

1.0 INTRODUCTION

This Spill Prevention, Control and Countermeasure (SPCC) Plan provides guidance on the prevention/control of, emergency response to, and remediation of oil spills at the Greene County Highway Department Clifton Avenue Operations facility (Clifton facility). This plan provides a written explanation of Greene County's compliance with the requirements of federal Clean Water Act regulations found at 40 CFR Part 112. It specifies the equipment, personnel, procedures, and steps to prevent, control and provide adequate countermeasures to an oil spill.

The format of this SPCC Plan follows the specified sequence presented in 40 CFR 112.7(a)(3). The regulatory citation immediately follows each section heading and each section includes a discussion of the facility's conformance with the requirements of the referenced citation.

The Oil Pollution Act also requires facilities that "could reasonably be expected to cause substantial harm to the environment by discharging into or on navigable waters" to prepare a facility specific response plan which greatly expands emergency response requirements and activities. Greene County has determined (using published federal guidelines) that the Clifton facility does not meet the criteria of a facility that poses substantial harm. Certification of this determination is included in Appendix G.

2.0 FACILITY DESCRIPTION -112.7(a)(3)

2.1 Facility Operations

Greene County's Clifton Avenue Operations facility located at 2065 North Clifton supports all road maintenance activities for unincorporated Greene County. The facility is comprised of two vehicle maintenance shops, materials and vehicle maintenance parts warehouse, sign shop, equipment storage sheds, and administrative offices. The majority of the facility is paved. The facility diagram in Figure 1 denotes the various oil storage locations. Table 1 lists oil storage locations and respective quantities.

The responsibility for implementation of this SPCC plan lies with the Greene County Highway Department.

2.2 Facility Oil Storage -112.7(a)(3)(i)

Bulk oil is stored at the Clifton facility for maintenance of fleet vehicles. Tables 1 and 2 detail the type, quantity, location, and storage containers for the oil storage areas which are depicted on the facility diagram (Figure 1).



Figure 1: Facility Map

Table 2: Bulk Oil Storage Units

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Location	Oil Type	Capacity (gal.)	Container Type
North Shop	Shell 15w40 T3 (diesel engine oil)	125	steel roller tote
North Shop			steel roller tote
North Shop			steel tank
North Shop	Shell 5w30 Motor Oil	250	steel tank
North Shop	Shell 5w20 formula motor oil	55	steel drum
North Shop	Citgo ATF +4 Transmission Fluid	55	steel drum
North Shop	Citgo AW 46 Hydraulic Oil	55	steel drum
North Shop	Autran SYN 295 Transmission Fluid	55	steel drum
North Shop	Caterpillar Transmission Fluid (x3)	165	55 gal. steel drums
North Shop	Transmission Fluid (x3)	165	55 gal. steel drums
North Shop			steel drum
North Shop JCB Transmission Fluid		55	steel drum
North Shop Automatic Transmission Fluid (x2)		110	55 gal. steel drums
West of North Shop	Used Oil	1,000	double walled steel tank
South Shop	Shell Spirax S4 (donax TDH hydraulic fluid)	125	steel roller tote
South Shop	Shell 5w20 formula motor oil	125	steel roller tote
South Shop	Shell 15w40 T3 (diesel engine oil)	55	steel drum
See Figure 1	Unleaded Gasoline	6,000	UST
See Figure 1	Unleaded Gasoline	20,000	UST
See Figure 1	Diesel Fuel	20,000	UST
See Figure 1	Diesel Fuel	20,000	UST
See Figure 1	Diesel Fuel	366	Cummins Generator
See Figure 1	Diesel Fuel	308	Cummins Generator
See Figure 1 Diesel Fuel		500	Cummins Generator
See Figure 1	Diesel Fuel	112	Cat. Generator
	Total Above Ground Capacity	4,111	
	Total Completely Buried Capacity	66,000	
	Total Facility Capacity	70,111	

2.2.1. Bulk Oil Storage Containers

North Shop

The north shop is the service bay for drivetrain and chassis maintenance activities on heavy vehicles. The shop replaces transmission fluid, hydraulic fluid, and engine oil for the fleet of dump trucks. The oil storage containers and capacities are detailed on Table 2 above. The oil stored in the shop is contained mostly in 55 gallon steel drums. The larger containers have hose connections that allow hydraulic fluid or transmission fluid to be pumped directly into the vehicle being serviced. The shop is completely enclosed and covered for protection from exposure to rainfall. The shop has an approximately 3' x 4.5' x 30 (405 cubic feet/3,029 gallons) sump in the floor for maintenance personnel. The steel-lined oil sump is directly plumbed into the 1,000 gallon steel holding tank. An air operated, double diaphragm pump in the holding tank pumps the oil directly from the heavy equipment bay to the 1,000 gallon waste oil tank.

South Shop

The south shop provides general maintenance for all vehicles in the county fleet. The shop changes oil on smaller passenger vehicles and conducts all other repairs on mechanical or electrical systems. Bulk oil containers are detailed in Table 2.

Used Oil Tank

Used oil is pumped from the north and south shops into a 1,000 gallon double-walled used oil tank manufactured by Agape Waste Oil Systems of San Diego, CA. The 1,000 gallon double-walled tank is located on the west side of the North Shop (see Figure 1). Used oil from vehicles is funneled into steel roller containers built specifically for the purpose of collecting used oil. Once full, the inflow valve is closed and a hose from the container drum is connected to the 1,000 gallon steel tank. The drum can then be pressurized with compressed air to pump the used oil into the 1,000 gallon holding tank. Used oil is collected by Heritage-Crystal Clean for recycling, usually once per month. Heritage-Crystal Clean is called when the used oil tank reaches 1/2-3/4 full (500-750 gallons)

Emergency Generators

Four (4) emergency generators are located at the Clifton Facility to provide back-up electrical power. See Figure 1 for locations of each generator. A Cummins DSHAC generator is located north of Building B and has a double walled fuel tank capacity of 366 gallons of diesel fuel. A Cummins DSGAA generator with a double-walled diesel fuel tank capacity of 308 gallons serves the administrative building. The North Shop, South Shop, and warehouse have a Cummins DQHAA generator with a double walled fuel tank capacity of 500 gallons of diesel fuel. Each of the Cummins generators are run on a weekly basis for approximately 20 minutes for emergency preparedness testing. The

Sign Shop is served by a Caterpillar D60-4 generator with a single-walled diesel tank capacity of 112 gallons.

Underground Storage Tanks

Two (2) 20,000-gallon underground fuel storage tanks containing diesel fuel are located in the central portion of the facility. Two (2) underground storage tanks contain unleaded gasoline. One (1) 20,000 gallon tank and one (1) 6,000 gallon tank combine for 26,000 gallons of underground unleaded gasoline storage capacity. See Figure 1 for the location of the four UST's. The underground storage tanks and piping are regulated by the UST regulations found at 40 CFR Part 268 and thus not subject to SPCC regulation. However, as further discussed in Section 3.6, the transfer of fuel to the tanks is regulated under the general secondary containment requirements found at 40 CFR 112.7(c).

2.3 Drainage Pathways

The Clifton facility is located within the Spring Branch watershed. The Spring Branch flows into the Little Sac River, then to Stockton Lake, and eventually to the Missouri River via Truman Lake and the Osage River. The Clifton facility is located only 300 feet from the watershed divide between the Missouri and Mississippi River basins. All runoff south of the Burlington Northern Railroad line flows into the Wilson's Creek watershed and then to the James River and on to the Mississippi through the White River system. Since the facility is so high in the watershed there is relatively little run-on to the site. The runoff from the site is generated almost entirely from the site itself.

Stormwater flow is predominantly from south to north. The fuel pump island is on a high point in the facility which breaks it into two sub-watersheds (see Figure 2). Runoff on the west side of the facility flows into a shallow detention basin on in the northwest corner. This basin discharges into a 30-inch reinforced concrete pipe which runs underneath W. High St. and discharges into an open channel that leads to Spring Branch. Runoff from the east side of the facility flows to a detention basin on the northeast corner of the property which discharges through an 18-inch pipe into the same open channel that leads to Spring Branch. The containment and countermeasures within this document are intended to intercept any spilled oil before it reaches these two discharge pipes.

2.4 Spill Prediction -112.7(b)

When experience indicates a reasonable potential for equipment failure, this plan must provide a prediction of direction, rate of flow, and total quantity of oil potentially discharged from the Clifton facility as a result of major equipment failure. To date, there have been no oil discharges from the facility. Either a discharge during a delivery of fuel to the underground tanks or a rupture of the used oil tank, especially when raining, seem to be the most probable worst-case scenario(s) for a spill. Table 3 presents the potential discharge quantity from each potential source.





Key	Bulk Container Type	Potential Discharge Scenario	Max. Potential Discharge Volume (Gallons)
1	Double Walled Steel Tank	Transfer to Collection Tanker	1000
2	Cummins DSHAC Generator	Overfilling/ Tank Weld Failure	366
3	Cummins DSGAA Generator	Overfilling/ Tank Weld Failure	308
4	Cummins DQHAA Generator	Overfilling/ Tank Weld Failure	500
5	Caterpillar D60-4 Generator	Overfilling/ Tank Weld Failure	112
6	Fuel Island	Transfer to vehicles	N.A.
7	North Shop	Faulty Hose connection	250
8	South Shop	Faulty Hose connection	125

Figure 2: Facility Drainage Paths

3.0 DISCHARGE PREVENTION MEASURES -112.7(a)(3)(ii)

This section presents those measures that have been and will be taken to prevent the discharge of oil to navigable waters as defined in 40 CFR 112.1. Discharge prevention measures are comprised of operational procedures/practices and structural type controls (e.g., secondary containment structures). For clarification, any activity performed to prevent the discharge of oil to navigable waters once oil has released from containers/equipment is not a discharge prevention measure, but a discharge countermeasure as discussed in Section 4. In this Section the following topics are discussed:

- Drainage Control Diversionary Structures and Containment
- Bulk Storage Tanks/Secondary Containment
- Maintenance/Inspections/Recordkeeping
- Site Security
- Personnel Training
- Facility Tank Car and Truck Loading/Unloading Operations
- Facility Transfer Operations

3.1 Drainage Control, Diversionary Structures, and Containment

With the exception of the 1,000 gallon waste oil tank, and generator fuel tanks, all aboveground petroleum product storage is indoors at the Clifton Facility. Should an oil product be released, the site drainage will direct the spilled oil to one of two small detention basins (at the northwest and northeast corners of the facility). These basins can contain petroleum products spilled during dry weather, but would be inadequate should a spill occur during wet weather. For purposes of this SPCC document we do not consider the detention basins to qualify as secondary containment. Greene County does not have any qualified oil-filled operational equipment as defined in 40 CFR 112.2 stored at the Clifton Facility.

3.2 Bulk Storage Tanks/Secondary Containment -112.7(d)

This section describes this plan's conformance with the requirements found in 112.7(d) and 112.8(c) that are specific to bulk storage containers. Each of the following requirements are addressed in turn:

- Container materials must be compatible with the material stored -112.8(c)(1)
- Adequate secondary containment volume -112.8(c)(2)
- Prevent uncontrolled discharges of storm water from diked areas -112.8(c)(3)
- Protect buried metallic USTs from corrosion and regularly leak test -112.8(c)(4)
- Corrosion protection for partially buried or bunkered tanks -112.8(c)(5)
- Integrity testing on regular schedule and when material repairs made -112.7(c)(6)
- Monitor for leakage through internal heating coils -112.8(c)(7)
- Equip containers with overfill prevention device -112.8(c)(8)
- Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge -112.8(c)(9)
- Promptly correct visible discharges -112.8(c)(10)
- Equip mobile or portable containers with secondary containment -112.8(c)(11)

As discussed in Section 2.1, Greene County Highway Department personnel operate and maintain the various bulk oil storage tanks and ancillary equipment at the Clifton facility. It is the responsibility of the Safety Officer to ensure that the tanks and ancillary equipment conform to local ordinances and applicable fire codes which may include but are not limited to, the National Fire Protection Association (NFPA) and International Fire Code Institute (IFCI) standards.

3.2.1 Material Compatibility -112.8(c)(1)

Table 4 presents construction information for the bulk storage containers, piping, valves, fittings, etc. at the Clifton facility.

Location	Capacity Construction (gal.) Type		Plumbing	Liquid Level Indicator	Manufacture date	
North Shop	125	steel roller tote	Threaded steel and flexible hose	Glass float gage	Unknown	
North Shop	125	steel roller tote	Threaded steel and flexible hose	Glass float gage	Unknown	
North Shop	250	steel tank	Threaded steel and flexible hose	Glass float gage	Unknown	
North Shop	250	steel tank	Threaded steel and flexible hose	Glass float gage	March, 2003	
West of North Shop	1,000	double walled steel tank	Threaded Steel	Glass float gage	Unknown	
South Shop	125	steel roller tote	Threaded steel and flexible hose	Glass float gage	Unknown	
South Shop	125	steel roller tote	Threaded steel and flexible hose	Glass float gage	Unknown	
See Figure 1	366	Cummins Generator	Threaded Steel	Dial gage	November, 2009	
See Figure 1	308	Cummins Generator	Threaded Steel	Dial gage	November, 2010	
See Figure 1	500	Cummins Generator	Threaded Steel	Dial gage	September, 2009	
See Figure 1	112	Cat. Generator	Threaded Steel	Dial gage	Unknown	

Table 4: Bulk Oil Storage Construction Details

3.2.2 Secondary Containment -112.8(c)(2)

North and South Shops

Because the bulk storage tanks in the north and south vehicle repair shops are all stored indoors, exposure to precipitation is not an issue. Current practice is to have enough booms and absorbent materials on hand to qualify as secondary containment as defined under 40 CFR 112.7 (c)(1). Greene County is in the process of purchasing commercially available polyethylene spill pallets and manufacturing custom containment units to further decrease the likelihood of an uncontrolled spill.

Waste Oil Storage Tank

The 1,000 gallon waste oil storage tank is a double walled tank providing secondary containment.

Diesel Powered Emergency Electric Generators

All the Cummins built generators are equipped with double walled fuel tanks in the base of the unit. The Caterpillar D60-4 has a single walled tank, but enough absorbent booms are kept on hand to contain the 112 gallon capacity of the generator tank.

3.2.3 Diked Area Drainage Controls -112.8(c)(3)

Greene County does not have any diked areas that qualify as secondary containment under CFR 112.8 (c)(3).

3.2.4 Buried Metallic Underground Storage Tanks -112.8(c)(4)

As shown on Figure 1 and described in Table 1, there are two 20,000-gallon steel underground storage tanks (UST) for diesel fuel in addition to a 20,000-gallon and a 6,000-gallon steel underground storage tank for unleaded fuel at the Clifton facility. These tanks are registered with and regulated by the Missouri Department of Natural Resources and as such, are exempt from SPCC regulation.

3.2.5 Corrosion Protection for Partially Buried or Bunkered Tanks -112.8(c)(5)

There are no partially buried or bunkered tanks at the Clifton facility, therefore, the requirements found at 40 CFR 112.8(c)(5) do not apply.

3.2.6 Integrity Testing -112.8(c)(6)

Bulk storage containers must be tested for integrity on a regular basis. "Integrity testing" is any means to measure the strength (structural soundness) of the container shell, bottom, and/or floor to contain oil and may include leak testing to determine whether the container will discharge oil. It includes, but is not limited to, testing foundations and supports of containers. Its scope includes both the inside and outside of the container. It also includes frequent observation of the outside of the container for signs of deterioration, leaks, or accumulation of oil inside diked areas.

EPA suggests following industry standards for integrity testing when applicable. The Steel Tank Institute (STI) Standard SP001, "Standard for Inspection of Aboveground Storage Tanks" is an industry standard that is referenced in the regulations and widely used by the regulated community. The periodic inspection requirements included in Section 3.3 are based on the inspection guidance included in STI Standard SP001.

Under the STI Standard SP001 (2011 revision) the Clifton tanks are considered "Category 1" tanks because they are elevated (i.e. raised above the ground surface) and they are equipped with secondary containment. Further, because all the tanks have capacities less than 5,000 gallons, they are only subject to periodic (monthly and annual) inspections. Personnel performing the inspections need not be certified, but they shall be knowledgeable about storage facility operations, the type of aboveground storage tank

(AST) and its associated components, and characteristics of the liquid stored. The inspector must also be familiar with pumping, piping and valve operations of the AST system.

1,000-Gallon Waste Oil Tank

Pressure testing is performed on the Waste Oil tank on an annual basis by pressurizing the interstitial space between the inner and outer tank walls to 3 pounds per square inch (PSI). This pressure must be held for at least one hour to verify the integrity of the tank walls. For all other ASTs, visual external inspections described in Section 3.3. are deemed sufficient for determining tank integrity.

3.2.7 Internal Heating Coils Leakage Monitoring -112.8(c)(7)

None of the bulk containers at Clifton are equipped with internal heating coils therefore the requirements found at 112.7(c)(7) do not apply.

3.2.8 Overfill Prevention -112.8(c)(8)

All storage tanks in the north and south shop greater than 55-gallons are equipped with float gauges to monitor liquid level. The 1,000-gallon waste oil tank and all generator fuel tanks are likewise equipped with float gauges on the top of the tanks. Highway Department personnel either perform, or are present to monitor the filling of all bulk containers.

3.2.9 Effluent Treatment Facility Inspections -112.8(c)(9)

This section applies to treatment facilities installed for the express purpose of treating oilcontaminated waters prior to discharge. This section is not applicable because there is no such treatment facility at the Clifton facility.

3.2.10 Visible Discharge Corrections -112.8(c)(10)

As specified in Section 4 of this plan, all visible discharges from containers will be promptly corrected.

3.2.11 Mobile and Portable Containers -112.8(c)(11)

The Clifton facility operates only one mobile refueler (as defined in 112.2) which is not required to have secondary storage capacity. Visual inspections are performed monthly to detect any possible leaks from the storage tank.

3.3 Inspections, Maintenance and Records -112.7(e)

Greene County Highway Department personnel conduct inspections and tests and maintain equipment/containers as specified below. Written procedures and records of inspections and tests, signed by the appropriate supervisor or inspector, will be kept for a period of at least three years.

3.3.1 Inspections

Greene County Highway Department personnel formally inspect all oil storage equipment and containers on a monthly basis or at the frequencies described below. Unusual circumstances or conditions (signs of deterioration, leaks, oil seepage, etc.) should be reported immediately to the Safety Officer or Operations Director. All monthly inspection findings are documented on the inspection log/checklist included in Appendix A.

Bulk Tanks in the North and South Shop areas

Monthly inspection items include:

- Visible signs of leakage from tank and components
 - Inspect tank shell, valves, and fittings for corroded or abraded areas, dents, distortions, defects in welds, and any other conditions, including leakage.
 - Inspect piping, valves, and gaskets for corroded areas, defects in welds, and other conditions, including leakage.
- Tank vents
 - Vents must be clear and unobstructed
- Bolts
 - Missing bolts, nuts, and fusible links or elements must be replaced, and loose bolts and nuts must be tightened.
- Liquid level floats
 - Ensure float is not stuck
- Secondary containment
 - Check containers for cracks, defects and cleanliness
- Spill response materials
 - Check spill kits and warehouse for adequate absorbent materials (see Appendix B) on hand

Mobile Refueling Tanker Truck

Greene County Highway Department personnel will inspect the double-walled tanker truck annually and ensure that documentation of the inspection is maintained. The following inspection items are taken from 49 CFR 180.407(d), applicable to visual inspection of specification cargo tanks. DOT certification of the inspector is not required. The external visual inspection will include as a minimum the following:

1. Inspect the tank shell and heads for corroded or abraded areas, dents, distortions, defects in welds, and any other conditions, including leakage, that might render the tank unsafe for transportation services.

2. Inspect piping, valves, and gaskets for corroded areas, defects in welds, and other conditions, including leakage that might render the tank unsafe for transportation service.

3. All devices for tightening manhole covers must be operative and there must be no evidence of leakage at manhole covers or gaskets.

4. All emergency devices and valves including self-closing stop valves, excess flow valves, and remote closure devices must be free from corrosion, distortion, erosion and any external damage that will prevent safe operation.

5. Missing bolts, nuts, and fusible links or elements must be replaced, and loose bolts and nuts must be tightened.

6. All major appurtenances and structural attachments on the cargo tank including, but not limited to, suspension system attachments, and connecting structures must be inspected for any corrosion damage which might prevent safe operation.

Oil-Drum Storage in North and South Shop Building

Monthly (Record on Log Sheet, Appendix A): Check condition of drums, bungs, and labels Check condition of secondary containments systems Check for proper arrangement of drums. Stacking barrels directly on top of each other is not allowed. Special racks have been fabricated for the vertical utilization of available space.

3.3.2 Tests/Maintenance

Periodic tests and preventive maintenance are integral components of spill prevention. Highway Department personnel test oil-storing equipment and containers according to applicable industry standards or manufacturers recommendations.

Annually, pressure testing is performed on the Waste Oil tank by pressurizing the interstitial space between the inner and outer tank walls to 3 pounds per square inch (PSI). This pressure must be held for at least one hour to verify the integrity of the tank walls. For all other ASTs, visual external inspections described in Section 3.3. are deemed sufficient for determining tank integrity.

3.3.3 Records

Maintenance of records required by this SPCC Plan is the direct responsibility of the Safety Officer and Environmental Compliance Manager. All records, reports, inspections, checklists, etc. specified in this SPCC Plan are to be kept on file and readily available for at least a period of three years. Records of inspections, testing, and maintenance activities required by this plan may be kept by using record keeping systems already in place.

3.4 Personnel, Training, and Discharge Prevention Procedures -112.7(f)

The Greene County Highway Department is responsible for properly instructing personnel in the operation and maintenance of equipment to prevent the discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the SPCC Plan.

The Safety Officer, in conjunction with the Environmental Compliance Manager, are responsible for ensuring that spill prevention briefings are conducted for their respective operating personnel at intervals frequent enough (at least once per year) to assure adequate understanding of this SPCC Plan. Such briefings highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures.

3.5 Security -112.7(g)

The Clifton facility is totally enclosed by fencing (kept in good repair). Access gates close after normal business hours (6 pm). The facility is adequately lighted at night for all nighttime operations conducted at the site, including discovery of discharges. Lighting, along with regular visits by sheriff's patrol vehicles is adequate to deter acts of vandalism.

3.6 Facility Tank Car and Tank Truck Loading/Unloading Rack -112.7(h)

The requirements found at 40 CFR 112.7(h) do not apply to the Clifton facility because there are no loading/unloading racks at the facility. However, the oil and fuel transfers described below are subject to the general secondary containment requirements found at 40 CFR 112.7(c).

Underground Fuel Storage Tanks

Secondary containment for releases of fuel is provided by the retention areas northeast and northwest of the underground fuel tanks (See Figure 2), as well as absorbent booms available to be deployed in the event of a product release.

Each of the four underground storage tanks are equipped with overfill and spill prevention devices as required by federal and state regulations. The overfill prevention

devices are intended to shut off the delivery of fuel to the tanks once they reach 95 percent capacity. Overfilling of the tanks should be prevented as long as the delivery truck driver makes the proper connections to the fill pipe.

Highway Department Warehouse personnel are responsible for scheduling and oversight of fuel deliveries. Prior to a delivery, warehouse personnel will determine the amount of fuel in the tank via the daily tank monitoring printout from the Franklin EVO leak monitoring system. The printout volume is entered into the Franklin Fueling System, online ordering database daily. The fuel use by each county vehicle is also monitored and automatically totaled as a secondary verification of the volume of the tank available to accept delivery. These checks are added protection against overfilling of the tanks.

Typically most releases that occur during fueling of vehicles are the result of human error (i.e., inattentiveness) resulting in the overfilling of a vehicle's fuel tank. All Greene County personnel that perform vehicle fueling should closely monitor the operation until it is complete. Emergency shutoff valves are located on the fuel pump island.

3.7 Facility Transfer Operations -112.8(d)

This section is not applicable to the Clifton facility as there are no facility transfer operations conducted. There are no above or below grade pipelines at Clifton used for oil transfer.

4.0 DISCHARGE COUNTERMEASURES -112.7(a)(3)(iv-vi)

This section, also known as the Oil Spill Contingency Plan (OSCP), presents the countermeasures that Greene County personnel (and/or response contractor) must take in the event of an oil release. Discovery, response and cleanup actions are included. In accordance with 112.7(a)(5), this portion of the Plan is organized in a way that will make procedures readily usable in an emergency. Supporting materials are included as appendices. The basic components of the OSCP are:

Spill Notification Immediate Response Activities Cleanup Activities Waste Disposal

It is not anticipated that an oil spill at the Clifton facility will require the assistance of an emergency response contractor. The Greene County warehouse facility maintains adequate spill response supplies/equipment (See Appendix B). It is the responsibility of the Safety Officer, Environmental Compliance Manager, or the Spill Response Coordinator to determine if outside assistance is required. Appendix C provides a listing of spill response contractors that could be procured if the need arises.

4.1 Notifications/Emergency Contacts

This section provides the emergency notification requirements in the event of an oil release. Notification must first be given internally to appropriate Greene County personnel and then externally to regulatory and other local governmental agencies. Any number of personnel may detect the release; therefore, it is essential that all employees be aware of this plan and understand they have a responsibility to report the release immediately.

4.1.1 Internal Notification

In all probability, a leak or spill will be detected by facility personnel during routine operations at the site. It is the responsibility of the employee who has discovered the leak to immediately notify their supervisor. The supervisor shall notify the Safety Officer who will in turn notify the Environmental Compliance Manager. The Environmental Compliance Manager will assume the role of Spill Response Coordinator (SRC). In the event the Environmental Compliance Manager is unavailable, the Safety Officer will be the designated SRC. The Safety Officer can be reached by calling 860-7707 or by calling the Environmental Compliance Manager at 834-3015. Names/phone numbers of those to be contacted are provided in Appendix D.

4.1.2 Notification of Regulatory Agencies

The SRC is responsible for ascertaining whether a particular spill event is reportable (based on information known to him/her) and for actually notifying the appropriate government agency. In ascertaining whether (and to whom) a spill is reportable, the SRC should use the following guidelines.

- 1. If the oil has the potential to reach navigable waters (creeks, streams, rivers, lakes) in sufficient quantity to cause visible sheen or bottom sludge, notify the National Response Center at 1-800-424-8802.
- 2. If an oil spill is in excess of 50 gallons, notify Missouri Department of Natural Resources (MDNR) by calling 573-634-2436. This is the MDNR Emergency Response Center, and the phone is manned 24 hours per day. Also call the Local Emergency Planning Commission (LEPC) by calling 417-869-6040.
- 3. If both conditions apply, notify both agencies.

The SRC shall be prepared to report the following information to the regulatory agency contacted:

- 1. Exact address and phone number of facility
- 2. Spill date and time
- 3. Type of material spilled
- 4. Estimates of total quantity spilled
- 5. Estimates of total quantity spilled into navigable water
- 6. Source of the spill
- 7. Description of affected medium
- 8. Cause of the spill
- 9. Damages or injuries caused by spill
- 10. Actions being used to mitigate effects of discharge
- 11. Whether an evacuation may be needed
- 12. Individuals/organizations who have been contacted

4.1.3 City and Fire Department Notification

It is the responsibility of the Safety Officer or Environmental Compliance Manager to notify the appropriate City agencies. Under the conditions described below, the Northwest Wastewater Treatment Plant and/or the Springfield Fire Department should be contacted.

If the potential exists or if oil has been discharged into the Springfield sanitary sewer system, immediate notification should be given to Bruce Hinkston, Plant Superintendent of the Northwest Clean Water Plant by calling 417-833-0697. If no one is available, call the Southwest Clean Water Plant at 417-891-1900. This number is staffed 24 hours per day. Additionally, the City of Springfield industrial pretreatment program should be notified by telephone at 864-1923 from the hours of 8:00 a.m. to 4:30 p.m.

While there is no requirement to notify the fire department in the event of an oil spill, they do have personnel and equipment to assist in the containment and cleanup activities, which could prove to be especially useful after normal working hours. If the spill is serious enough to be deemed an emergency and/or additional manpower is required, the fire department should be contacted by calling 864-1550 or 911. Large spills will be handled by the fire department's hazardous materials (HAZMAT) team.

4.2 Immediate Response Activities

Immediate response activities are performed from the time of spill detection (or if a release is suspected) to the time the leak is stopped (if possible) and the spill contained. Highway Department personnel are responsible for implementing immediate responses necessary to preclude entry of oil into the storm drains including the deployment of absorbent material, absorbent booms, containment berm construction, and diversions. The Safety Officer is in charge of implementing spill containment procedures. The Spill Response Coordinator will work with the Safety Officer by providing oversight and

guidance during the response activities. If required, the immediate services of a spill response contractor (see Appendix C) should be obtained.

To the extent practicable, all oil spills must be precluded from entering the storm water drainage system. Even small spills have the potential to trigger state, federal and local reporting requirements, and monetary penalties.

The outlet structures on the northwest and northeast detention basins (See Figure 2) are the last on-site point of the storm water drainage system depending on the location of the spill. An oil release which causes a visible sheen or bottom sludge in the storm water beyond this point is reportable, therefore a concerted effort should be made to prevent oil releases from migrating beyond this point.

The following sections present immediate response actions specific to the various oil storage locations at the site. These response actions are presented only to provide general guidance. At the discretion of the Safety Officer, or Environmental Compliance Manager, and depending on the specifics of the release, it may be necessary to perform additional or alternate actions.

North and South Shop Buildings

The location of a release within the North or South Shop Buildings will determine which part of the stormwater drainage system might be impacted. Since all oil is stored inside the buildings, any spill is most likely to be contained within the building and not impact the stormwater system at all. In the event of a spill any open doors will immediately be closed to contain the spill as much as possible. Any oil that escapes the building and is released on the east side of the buildings has the potential to flow north to the detention basin in the northeast corner of the facility (see Figure 2). Oil escaping the building on the west side will have the potential to migrate north to the detention area on the northwest or northeast side of the facility depending on if the flow splits or not. Immediate response actions should include:

- Immediately close all outer doors and line the door sill with absorbent booms to prevent escape of oil outside the building
- If possible, stop leakage from containers or equipment. If leakage cannot be stopped, investigate the potential of diverting release into temporary containment structure or pans, or into the sump in the north shop.
- Deploy absorbent mats, pillows, and/or booms perpendicular to the flow path in Figure 2 to intercept oil before it reaches the detention basin if oil has escaped the building.
- If oil has entered the detention basin(s), deploy booms at the inlet box on the southwest corner of N. Clifton and W. High Streets and/or the outlet pipes for the northwest detention basin.
- If oil has been discharged from the basin, also deploy booms in the concrete drainage channel north of W. High St. Permission will need to be obtained from

the owner of 2651 W. High St. or 2215 N. Ethyl Pl. to gain access to the drainage channel for boom deployment.

Waste Oil Tank

In the unlikely event of a breach in both walls of the used oil tank, oil will flow north and likely split between the northwest and northeast basins and some may flow directly into W. High St. if not immediately contained.

Immediate response actions should include:

- Deploy sandbags across the open side of the waste oil tank enclosure to contain oil in a confined area. For releases inside sand bag diked area, collect oil using standard absorbent materials or by transferring oil to drums. Spill supplies are located in the warehouse.
- Deploy absorbent mats, pillows, and/or booms perpendicular to the flow path in Figure 2 to intercept oil before it reaches the detention basin.
- If oil has entered the detention basin(s), deploy booms at the inlet box on the southwest corner of N. Clifton and W. High Streets and/or the outlet pipes for the northwest detention basin.
- If oil has been discharged from the basin, also deploy booms in the concrete drainage channel north of W. High St. Permission will need to be obtained from the owner of 2651 W. High St. <u>or</u> 2215 N. Ethyl Pl. to gain access to the drainage channel for boom deployment.

Underground Fuel Storage Tanks

Releases in the immediate area of the underground tanks have the potential to enter the northwest detention area. Releases at the fuel dispensers have the potential to flow to the northeast basin, northwest basin, or to W. High St. Immediate response activities include:

- Deploy absorbent mats, pillows, and/or booms perpendicular to the flow path in Figure 2 to intercept oil before it reaches the detention basin.
- Protect basin outlet by use of absorbent mats, pillows or booms.
- If oil has been discharged from the basin, also deploy booms in the concrete drainage channel north of W. High St. Permission will need to be obtained from the owner of 2651 W. High St. or 2215 N. Ethyl Pl. to gain access to the drainage channel for boom deployment.

4.3 Cleanup Activities

Cleanup activities begin immediately following spill containment and conclude with full site remediation.

Cleanup objectives include:

- · Removal of free product
- Removal of contaminated materials
- Removal of oil from storm drainage system and waterways

Expedite cleanup activities to minimize adverse environmental impacts caused by the release. Attempt to recover as much free product as possible thus minimizing the amount of infiltration of the oil into underlying soils. Oil can impair (soften) an asphalt surface if left in contact with it too long. Clean storm drainage systems thoroughly to prevent further migration of oil during subsequent rainfall events. A listing of equipment and supplies to utilize in the cleanup activities that are available at the Clifton facility can be found in Appendix B. Other equipment needed may be available from local equipment rental companies.

4.3.1 Removal of Free Product

Although not likely, removal of oil as a liquid may be required as part of cleanup efforts at the Clifton facility. Oil requiring removal may be in secondary containment units, diked areas, storm water drains, or atop water. Reuse of the oil (as opposed to treating as a waste) is a goal to keep in mind when selecting the method of removal/collection. Attempts should be made to minimize the amount of debris/water recovered with the oil.

For small volumes of oil recovered, closed-top, 55-gallon drums can be used to contain the recovered oil. Larger volumes may require obtaining a tanker for storage of the oil. Appendix C provides a listing of those companies that can supply tankers. Additionally, vacuum truck services are available from a few of the contractors identified.

Close attention should be paid to the filling operations to minimize any spillage that may occur. Oil absorbent booms and granules should be available to cleanup minor spills. This material should be immediately placed in open-top, 55-gallon drums or other suitable containers.

4.3.2 Removal of Contaminated Material

The Safety Officer, in cooperation with the Environmental Compliance Manager will determine the magnitude of the cleanup activities governed by current regulations. Remediation may involve the excavation of soils either manually or with the use of heavy equipment. Develop waste type and quantity estimates for obtaining proper disposal approvals (discussed in Section 4.4). Waste characterization sampling may be required. The SRC may coordinate water and/or soil sampling with an environmental contractor to verify that applicable cleanup standards have been met.

Oil contaminated materials (i.e., excavated soils, absorbent materials, etc.) should, depending on the volume generated, be either contained in drums or placed directly into plastic lined dump trucks. Avoid stockpiling of materials to minimize handling of the material. Storm water runoff from stockpiled materials could cause additional contamination. If stockpiling cannot be avoided, the area should first be lined with heavy visqueen and bermed around the edges. Once material has been deposited on the plastic, it should be covered with heavy visqueen and secured with sandbags or their equivalent.

Ensure that materials destined for disposal as solid waste are void of free liquids. If necessary, place drier soil and/or absorbent material into the drums/trucks to soak up any free liquids that may drain from saturated materials. If possible, mix the materials in the drums or truck to alleviate this situation. To preclude rainfall, dump trucks shall be immediately covered or parked under a roofed area after being filled. Dump trucks containing contaminated materials shall not be left uncovered overnight.

4.3.3 Removal of Oil from the Storm Water Drainage System and Waterways

Releasing oil into a waterway, defined as the open channels that receive discharge water from the two detention basins, in sufficient amounts to cause a visible sheen or bottom sludge is a violation of state and federal water quality standards. Remediation is not complete until all visible indications of oil have been removed. Oil booms can be used to contain oil on water surfaces. Small areas can be soaked up using oil absorbent mats. Large surface areas may require using an oil skimmer. Oil released into "dry" storm water drains should be removed so as to prevent the further migration and contamination of waterways. Monitor future storm water discharges for signs of oil.

4.4 Waste Disposal

Dispose of all oil-contaminated material in accordance with federal, state, and local regulations. Anticipated waste streams generated from the cleanup of an oil spill are pure oil, water contaminated oil, oily water, and oil contaminated solids (e.g., soils, gravel, absorbent materials, personal protective equipment) that do not contain free liquids. Oil which, after recovery, can no longer be used as originally intended will be disposed of as used oil under all current and applicable regulations.

Oil contaminated solids (i.e., soils, absorbent materials, clothing, etc.) which do not contain any free liquids will be disposed of at the Springfield Sanitary Landfill under special approval from the City's Solid Waste Division. The Environmental Division of the Resource Management Department is responsible for obtaining the necessary approvals from the City. A DNR Special Waste Disposal Request may be required to be submitted to the City (See Appendix F). This form can be obtained at http://dnr.mo.gov/forms/780-1166-f.pdf

4.5 Spill Reports

Submittal of a written follow-up report to Greene County's Environmental Division is the responsibility of the Safety Officer, or Environmental Compliance Manager involved in spill response activities. The Spill Report form shown in Appendix E must be used. If required, the Environmental Compliance Manager will submit written reports to regulatory agencies. A record of all spill reports shall be maintained with the SPCC Plan.

APPENDIX A MONTHLY INSPECTION AND CORRECTIVE ACTION LOG

MONTHLY INSPECTION LOG CLIFTON OIL AND FUEL BULK STORAGE CONTAINERS

Inspection Date:

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Date of Previous Inspection:		
Inspector's Signature:		
		Commente
SOUT	Y N H SHOP	Comments
125 Gal. Tote (Hydraulic Fluid)		
Floor is free of oil drips		
Hose connections are secure and clean		
Tank welds are in good condition		
125 Gal. Tote (5-W-20 Motor Oil)		
Floor is free of oil drips		
Hose connections are secure and clean		
Tank welds are in good condition		
55-Gallon Drums		
Spill pallets are in good condition		
No free oil in spill pallets		
Drums in good condition and properly arranged		
Adequate supplies in spill kit(s)		
	H SHOP	7
55-Gallon Drums		
Spill pallets are in good condition		
No free oil in spill pallets		
Drums in good condition and properly arranged		
125 Gal. Tote (Hydraulic Fluid)		
Floor is free of oil drips		
Hose connections are secure and clean		
Tank welds are in good condition		
125 Gal. Tote (15-W-30 T3 Diesel Engine Oil)		
Floor is free of oil drips		
Hose connections are secure and clean		
Tank welds are in good condition		
250 Gal. Tank (15-W-30 T3 Diesel Engine Oil)		
Containment unit is in good condition		
Hose connections are secure and clean		
Tank welds are in good condition		
Sight glass is readable and showing no overfill		
250 Gal. Tank (Hydraulic Fluid)		
Containment unit is in good condition		
Hose connections are secure and clean		
Tank welds are in good condition		
Sight glass is readable and showing no overfill		
Adequate supplies in spill kit(s)		
1,000 Gal. Used Oil Tank		
Passes interstitial pressure test		
Ground is free of visible oil leaks		
Tank welds are in good condition		
Hose connections are secure and clean		
Vent is clean and unobstructed		
Sight glass is readable and showing no overfill		
EMERGENCY	GENERATORS	
Generator #1 (Cummins, Building B)		
No visible diesel or oil leaks		67
Generator #2 (Cummins, Administrative Building)		
No visible diesel or oil leaks		
Generator #3 (Cummins, Warehouse and Shops)		
No visible diesel or oil leaks		
Generator #4 (Caterpillar, Sign and Paint Shop)		
No visible diesel or oil leaks		
INV VISIOLE VIESEL OF OIL IEGKS		

	Y	N	Comments
Fuel Dispensing	Equip	ment	
Fuel Hoses			
Hose connections are secure with no visible leaks			
Hose walls are in good condition with no visible leaks			
Tank welds are in good condition			
Fuel Pump Mechanical Systems (Remove Panel to Inspect)			
Floor of pump housing is dry and drip free			
No visible leaks from pipes and connections			
Adequate supplies in spill kit(s)			
Mobile Refueling Truck			
Hose connections are secure with no visible leaks			
Flanges, gaskets, and bolts are tight			
Tank welds are in good condition			

CORRECTIVE ACTION LOG CLIFTON OIL AND FUEL BULK STORAGE CONTAINERS

Date of Inspection Deficiency Noted:_____

Description of Deficiency:

Description of Corrective Action Needed:_____

Date Corrective Action Completed:_____

All inspection checklists and corrective action logs are to be kept on file for a period of no less than three years from the date of inspection.

APPENDIX B				
SPILL RESPONSE SUPPLIES & EQUIPMENT				

Material		Quantity	Location
	Absorbent Mat Roll	1 Each	South Shop
2 Spill Kits	Oil Absorbent Socks (5-inch diameter 10- foot length)	4 Each	South Shop
	55-Gallon Closed Top Drums	1 Each	South Shop
Oil Absorbent	Socks (5-inch diameter, 10-foot length)	24	Warehouse
Absorbent Ma	t Roll	5	Warehouse
Granular Mult	-Purpose Absorbent	1 Pallet (1,600 lbs.)	Warehouse
o	Absorbent Mat	2 Sheets	Warehouse
	Oil Absorbent Socks (5-inch diameter 10- foot length)	1	Warehouse
Spill Kit	Absorbent Pillow (Large)	1	Warehouse
	Oil Absorbent Socks (3-foot length)	2	Warehouse
	Absorbent Pillow (Small)	1	Warehouse
	Oil Absorbent Granules	1 Package	Warehouse

APPENDIX C REMEDIATION CONTRACTORS

SPILL CLEAN UP CONTRACTORS	VACUUM TRUCK SERVICES
Sunbelt Environmental Services	Sunbelt Environmental Services
621 N. Prince Lane	621 N. Prince Lane
Springfield, MO 65802	Springfield, MO 65802
417-831-5052	417-831-5052
831-6258 (fax)	831-6258 (fax)
1-800-333-5052 (24 hr. #)	1-800-333-5052 (24 hr. #)
Environmental Works	Safety Kleen
1455 E. Chestnut Expresway	734 N. West Bypass
Springfield, MO 65802	Springfield, MO 65802
417-890-9500	417-869-1179
417-823-9659 (fax)	
877-827-9500 (24 hr. #)	
USED OIL RECYCLING	TANKER SUPPLIERS
	Rex Smith Oil Co.
	2321 N. West Bypass
	Springfield, MO 65803
	417-866-1960
Safety Kleen	National Oil Co.
734 N. West Bypass	2345 W. Kearney
Springfield, MO 65802	Springfield, MO 65803
417-869-1179	417-866-6622
	1-800-678-6622 (24 hr. #)

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APPENDIX D INTERNAL NOTIFICATION CALL-OUT LIST

First call the on-call pager number. At any time the Highway Department supervisor who is on call can be reached by calling the duty pager number, 287-0098. If there is no response, call the Highway Department personnel in the order listed. The supervisor on duty will then call the Environmental Compliance Manager.

Greene County Highway Department

Jeff Deckard	Office: 829-6513
Safety Officer	Cell: 860-7707
Harry Stennett	Office: 829-6532
Operations Director	Cell: 838-1264
Jim Norgren	Office: 829-6518
Bridge/Culvert Maintenance Supervisor	Cell: 300-2614
Joe Polo	Office: 829-6531
West Side Supervisor	Cell: 838-7325
Kevin Bade	Office: 829-6042
East Side Supervisor	Cell: 4549-8598
Andrew Nelson	Office: 829-6514
Projects Manager	Cell: 234-4114
Adam Humphrey, P.E.	Office: 829-6536
Assistant Administrator	Cell: 860-9148
Rick Artman	Office: 829-6505
Administrator	Cell: 840-2402

Greene County Environmental Division

Tim Davis	Office: 868-4122
Environmental Compliance Manager	Cell: 834-3015

APPENDIX E OIL SPILL REPORT FORM

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OIL SPILL REPORT FORM

Date of Spill:
Cause of Spill:
Approximate Volume of Oil Spilled: gallons
Was Spill Reported to Regulatory Agency? Yes No
Describe Portion of Facility Affected:
Did Oil Reach Any Part of the Off-Site Stormwater System? Yes No
Countermeasures Taken (Include Dates, Attach Separate Sheet if Necessary):
Follow-Up Monitoring or Countermeasures Needed:
Highway Department Contact Person:
Report Entered By:
Date of Report:

APPENDIX F SPECIAL WASTE DISPOSAL REQUEST

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MISSOURI DEPARTMENT OF NATURAL RESOURCES SOLID WASTE MANAGEMENT PROGRAM SPECIAL WASTE DISPOSAL REQUEST

SECTION I GENERAL INFORMATION (TO BE COMPLET	ED BY THE GENERATOR AND LANDFILL OPERATOR)
DISPOSAL FACILITY	WASTE GENERATOR
NAME	
ADDRESS	
CITY, STATE, ZIP CODE	
TELEPHONE NUMBER WITH AREA CODE	
PCONT NO.	
PERMIT NO.	N/A
CONTACT PERSON	
SECTION II WASTE CHARACTERIZATION (TO BE COMP	LETED BY THE GENERATOR)
A NAME OF WASTE	
B. DESCRIPTION OF GENERATION PROCESS	
C. (CHECK ONE)	
	(3.) SLURRY (20% OR LESS SOLIDS)
(4.) LIQUID (5% OR LESS SOLIDS) (5.) OTHER – SPECIFY:	
(INDICATE) % SOLIDS BY WEIGHT:	
PUMPABLE: YES NO,	
D. WAS THE WASTE EVER CLASSIFIED OR LISTED HAZARDOUS?	PLASHPOINT
YES NO IFYES, SPECIFY THE EPA WASTE NUMBER:	
E. LIST BELOW THE CHEMICAL COMPOSITION (ATTACH ANY ADDITIONAL ANALYSI	161
E. EST BELOW THE CHEMICAL COMPOSITION (AT ACT ANT ADDITIONAL ANALTS)	
MAJOR COMPONENTS	% BY WEIGHT
1	
2	
3.	
A	<i>j</i>
F. SOURCE OF CHEMICAL DATA	
SECTION III GENERATION RATE/DISPOSAL FREQUENC	CYT ITO DE COMPLETER RY THE CENERATORY
A. AVERAGE GENERATION RATE (CUBIC YARDS PER WEEK, POUNDS PER MONTH	, EIC.)
B. DISPOSAL REQUEST [COMPLETE (1) OR (2)]	
(1) Continuel (or intermittent)	to the second second to the second
Indicate the quantity available for immediate disposal, if applicable	ty and frequency of disposal (cubic yards per week, pounds per month, etc.)
(2) One-time only	
If one-time only, indicate the total amount to be disposed of	
*NOTE: INDICATE APPROPRIATE UNITS (TONS, GALLON	NS. POUNDS, CUBIC YARDS, ETC.)
SECTION IV TRANSPORTATION (TO BE COMPLETED B	
A. CONTAINERS USED FOR TRANSPORTATION (CHECK ONE)	B. TYPE OF VEHICLE
(1) BULK (CUBIC YARDS)	(1) TRACTOR-TRAILER
(1) BOER CONCERNESS	(2) ROLL-OFF/LUGGER
(3) CASES, CARTONS (
(4) GALLONS (GALLONS)	(4) OTHER
(5) OTHER - SPECIFY	
AO 780-1166 (05-12)	Page 1 of 2

SECTION V DISPOSAL TECHNIQUES (TO BE COMPLETED BY LANDFILL OPERATOR)		
A. SEPARATE TRENCH BURIAL		
(1) LOCATION ON LANDFILL SITE		
(2) TRENCH DESIGN PREVIOUSLY APPROVED BY DNR?		
8. CO-DISPOSAL WITH MUNICIPAL WASTE ON ACTIVE FILL FACE		
(1) AVERAGE DAILY QUANTITY OF MUNICIPAL SOLID WASTE	(SPECIFY TONS OR CUBIC YARDS)	
(2) SPECIAL WASTE TO BE UNLOADED AT TOP OF WORKING FACE		
TOE OF SLOPE		
C. CONTRACTOR OF C		
SECTION VI HANDLING PROCEDURES (TO BE COMPLETED BY GENERATOR)		
Safety precautions during handling: Provide handling information supplied by product manufacturer, waste generator, or from other sources, describing the necessary measures that should be taken to protect personal safety, to control dusting, or to ensure fixed placement of waste. This should include a description of materials not compatible with this waste. Section VII CERTIFICATION (TO BE COMPLETED BY GENERATOR AND LANDFILL OPERATOR) I, the undersigned, submit this request to dispose of the named waste and certify that the information supplied herein is correct. I understand approval to dispose of the waste and certify that the information supplied herein is correct. I understand approval to dispose of the waste and certify that the information supplied herein is correct. I understand approval to dispose of the waste and certify that the information supplied herein is correct.		
SIGNATURE OF LANDFILL OPERATOR OR AUTHORIZED REPRESENTATIVE		
PRINT NAME/TITLE	DATE	
I, the undersigned, submit this request to dispose of the named waste and certify that the waste named herein, to the best of my knowledge, Management Law and rules, and that the information supplied herein is correct.	s not a hazardous waste as defined by the Missouri Waste	
Namagement Curron races, and units are information supplied referring Context		
PRINT NAME/TITLE	DATE	
	Contra Cont	
ADDITIONAL COMMENT	1	
MAIL THE COMPLETED FORM TO: PLEASE SEND TO THE REGIONAL OFFICE IN YOUR AREA. For address information visit: <u>http://dnr.mo.gov/regions/regions.htm</u>		
MO 780-1166 (05-12)	Page 2 of 2	
	rage 2 of 2	

APPENDIX G CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME:	Greene County Highway Department
FACILITY ADDRESS:	2065 North Clifton Avenue
	Springfield, Missouri 65803

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 <u>X</u>____

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

YES _____ NO X____

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

YES _____ NO X____

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

YES _____ NO X____

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

YES _____ NO X___

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.

<u>Timothy</u> R. Javi Name (type or print) Signature Environmental Compliance Manager

Title

Date