

STATE OF ALASKA

Department of Military and Veterans Affairs
Division of Administrative Services



Spill Prevention, Control, and Countermeasure (SPCC)

Plan Services

RFP No. 240000013

Amendment #001

April 1, 2024

The date of receipt of proposals has been extended from April 5th, 2024 @ 2:00PM AKST to April 15th, 2024 @2:00PM AKST.

This amendment is being issued to *answer questions and supply attachments from vendors.*

Important Note to Offerors: You must sign and return this page of the amendment document with your proposal. Failure to do so may result in the rejection of your proposal. Only the RFP terms and conditions referenced in this amendment are being changed. All other terms and conditions of the RFP remain the same.

Procurement Officer:
Brandy L. Halverson
Phone: (907) 428.7221
Email: MvaDasProcurement@alaska.gov

COMPANY SUBMITTING PROPOSAL

AUTHORIZED SIGNATURE

DATE

Questions submitted by potential offerors and answers from the state:

Question 1: Is there a site list where site visits and SPCC Plan updates are listed that will be included in the contract? Section 2.01 of the RFP states that *DOs and TOs will most likely be for the sites listed in Attachment A.*

Answer: Attachment A attached hereafter.

Question 2: The RFP indicates that a cost proposal is required. If a list of sites that must be visited and SPCC updates will be prepared for is not provided, it will be difficult to provide a cost proposal. Is a cost proposal required to be submitted with the proposal?

Answer: Yes, the cost proposal will be used for potential cost negotiations.

Question 3: Can Final Documents including photographs, and word and PDF versions or SPCC Plans be provided on USB thumb drive instead of Compact Disc? Many computers no longer have CD drives.

Answer: Yes

Question 4: Section 3.01.03 of the RFP states that the desired format is listed in Attachment B of the document, but there is no Attachment B.

Answer: Attachment B attached hereafter.

Question 5: Attachment 8 Bidder's Checklist states under item A.1 that "A completed Page 1 of this ITB" is required as part of the bidder submittal package. Is page 1 of the ITB the Submittal Form A – Offeror Information?

Answer: Yes, that was an administrative error.

Question 6: Sec 3.01.01 Scheduling and Site Research: In the first paragraph, the text indicates a detailed Project Schedule be submitted within 15 calendar days of the Notice to Proceed (NTP). In the third paragraph, the text indicates site visits and schedule shall be projected by the contractor within five days of receipt of the NTP. Please clarify the Project Schedule submittal timeline.

Answer: The Project Schedule must be submitted within 15 calendar days not 5 calendar days.

Question 7: Although it will not be evaluated, the RFP requires a Cost Proposal – Submittal Form F: Based on the information in Section 4.09 the cost identified on Cost Proposal - Submittal Form F will be used to establish a contract. Insufficient information is provided in the RFP to develop the requested cost proposal. Will an addendum

be published providing the location of each location of each AKARNG facility that will require a site visit and the status of the existing SPCC Plan?

Answer: Attachment A list our running tracker of active sites right now that have a SPCC in place.

Question 8: Will the Proposal Due Date be extended to allow sufficient time to develop the requested cost proposal after receipt of pertinent information?

Answer: Yes, the proposal deadline is hereby extended.

Question 9: It is not clear how the Cost Proposal – Submittal Form F will apply to project cost for Delivery Orders and accompanying Task Orders under the Master Agreement.

Answer: The Cost Proposal should include labor rates (Managers, Professionals, Technicians, GSI Technician, Spill Response Team, Safety, Crew are some examples). Other indirect cost may include airfare, vehicle rental, gas, binding printing, and reproduction.

Question 10: Provide an example of SPCC in the desired plan format as noted in Section 3.01.

Answer: Please see attached SPCC.

Question 11: Assuming attachment A has list of SPCCs and renewal dates, would you like a firm fixed price per facility of an hourly estimate/T&M schedule?

Answer: Firm fixed rate per facility.

Question 12: Would you also like a firm fixed price or an hourly estimate/T&M schedule for SPCC amendments?

Answer: Firm fixed rated per amendment.

Question 13: Will DMVA/AKARNG provide transportation from hub cities (communities accessible by commercial air) to remote sites?

Answer: No

Question 14: Please clarify the following statement found in Section 3.07: The contractor shall include in their cost proposal: transportation, lodging and per diem cost sufficient to pay for person(s) to make trip(s) to various locations described in this RFP. **Travel to other locations will not be required.**

Answer: Travel locations listed outside of Attachment A will not be required to accomplish the requested task.

Attachment A

AKARNG Site List for Spill Prevention, Control, and Countermeasure (SPCC) Plans

Table 1. AKARNG Site List for Potential Spill Prevention, Control, and Countermeasure (SPCC) Plans. Sites marked with asterisks are active SPCC sites. Remaining unmarked sites have had tanks closed in accordance with 40 CFR 112.2, or do not meet the regulatory minimum capacity threshold for needing an SPCC plan.

Facility Name	Facility Address	Latitude	Longitude	Existing Plan File Format	Existing Plan Style Format
Akiachak Readiness Center	See Lat/Long	60.90927	-161.43264	MS Word	Old Format
Akiak Readiness Center	See Lat/Long	60.91213	-161.2175	MS Word Adobe PDF	Old Format
Alcantra Readiness Center	3410 East Bogard Road, Wasilla, AK, 99654	61.60303	-149.36523	No Existing Plan	N/A
Ambler Readiness Center	See Lat/Long	67.08773	-157.85765	No Existing Plan	N/A
Atmautluak Readiness Center	See Lat/Long	60.86289	-162.2738	MS Word Adobe PDF	Old Format
**Bethel AAOF	3571 Airport Road, Bethel, AK, 99559	60.77567	-161.8461	MS Word Adobe PDF	New Format
**Bethel Readiness Center	3570 Tower Road, Bethel, AK, 99559	60.77641	-161.8489	MS Word Adobe PDF	New Format
Brevig Mission Readiness Center	See Lat/Long	65.33262	-166.49412	Adobe PDF	Old Format
**Bryant Army Airfield	Randall Road, JBER, AK, 99505	61.26343	-149.66798	MS Word Adobe PDF	New Format
Camp Carroll	Davis Highway, JBER, AK, 99505	61.27244	-149.67457	No Existing Plan	N/A

**Camp Denali	Army Guard Road, JBER, AK, 99505	61.27231	-149.64128	MS Word Adobe PDF	Old Format
Chefornak Readiness Center	See Lat/Long	60.15892	-164.273	MS Word Adobe PDF	Old Format
Chevak Readiness Center	See Lat/Long	61.52691	-165.58977	MS Word Adobe PDF	Old Format
Eek Readiness Center	See Lat/Long	60.2186	-162.029	MS Word Adobe PDF	Old Format
Elim Readiness Center	See Lat/Long	64.61811	-162.26017	Adobe PDF	Old Format
**Emmonak Readiness Center	Delta Street, Emmonak, AK, 99581	62.77726	-164.52992	Adobe PDF	Old Format
**Fairbanks Readiness Center	202 Wien Street, Fairbanks, AK, 99701	64.84173	-147.75408	MS Word Adobe PDF	Old Format
Goodnews Bay Readiness Center	See Lat/Long	59.11851	-161.58385	MS Word Adobe PDF	Old Format
Holy Cross Readiness Center	See Lat/Long	62.20216	-159.7721	No Existing Plan	N/A
**Hooper Bay Readiness Center	See Lat/Long	61.53191	-166.09888	MS Word Adobe PDF	Old Format
**Juneau AAOF	8425 Livingston Way, Juneau, AK, 99801	58.35772	-134.56858	MS Word Adobe PDF	Old Format
**Juneau Facilities Maintenance Shop	12300 Mendenhall Loop Road, Juneau, AK, 99801	58.38994	-134.64856	MS Word Adobe PDF	Old Format
**Juneau Readiness Center	12300 Mendenhall Loop Road, Juneau, AK, 99801	58.39056	-134.64607	MS Word Adobe PDF	Old Format

Kaltag Readiness Center	See Lat/Long	64.32904	-158.72665	MS Word Adobe PDF	Old Format
Kasigluk Readiness Center	See Lat/Long	60.89407	-162.51957	MS Word Adobe PDF	Old Format
Kenai Readiness Center	105 South Forest Drive, Kenai, AK, 99611	60.55909	-151.27656	No Existing Plan	N/A
**Ketchikan Readiness Center	645 Jackson Street, Ketchikan, AK, 99901	55.35374	-131.68125	Adobe PDF	Old Format
**Kipnuk Readiness Center	See Lat/Long	59.9341	-164.03832	MS Word Adobe PDF	New Format
Kivalina Readiness Center	See Lat/Long	67.7273	-164.53676	No Existing Plan	N/A
Klawock Readiness Center	See Lat/Long	55.57996	-133.0687	No Existing Plan	N/A
**Kodiak Readiness Center	125 Powell Avenue, Kodiak, AK, 99615	57.79465	-152.39278	MS Word Adobe PDF	Old Format
Kongiganak Readiness Center	See Lat/Long	59.95974	-162.8861	MS Word Adobe PDF	Old Format
Kotlik Readiness Center	See Lat/Long	63.0328	-163.55651	Adobe PDF	Old Format
**Kotzebue AAOF	Air Force Road, Kotzebue, AK, 99752	66.8822	-162.60726	MS Word Adobe PDF	Old Format
**Kotzebue Armory	605 Third Avenue, Kotzebue, AK, 99752	66.90122	-162.58151	MS Word Adobe PDF	Old Format
**Koyuk Readiness Center	See Lat/Long	64.93131	-161.15861	MS Word Adobe PDF	New Format
Koyukuk Readiness Center	See Lat/Long	64.87932	-157.70569	Adobe PDF	Old Format

**Kwethluk Readiness Center	See Lat/Long	60.81088	-161.43532	MS Word Adobe PDF	New Format
Kwigillingok Readiness Center	See Lat/Long	59.8642	-163.14041	Adobe PDF	Old Format
Manokotak Readiness Center	See Lat/Long	58.98465	-159.05263	MS Word Adobe PDF	Old Format
**Newtok Readiness Center	See Lat/Long	60.94069	-164.63362	Adobe PDF	Old Format
Noatak Readiness Center	See Lat/Long	67.57032	-162.96786	No Existing Plan	N/A
**Nome AAOF	Prospect Street, Nome, AK, 99762	64.5163	-165.42593	MS Word Adobe PDF	New Format
**Nome Readiness Center	433 East Front Street, Nome, AK, 99762	64.49657	-165.39941	MS Word Adobe PDF	Old Format
Nunapitchuk Readiness Center	See Lat/Long	60.89451	-162.45957	Adobe PDF	Old Format
Point Barrow Armory	See Lat/Long	71.2912	-156.78188	No Existing Plan	N/A
**Quinhagak Readiness Center	See Lat/Long	59.7533	-161.89506	MS Word Adobe PDF	Old Format
Saint Mary's Readiness Center	See Lat/Long	62.05006	-163.18432	MS Word Adobe PDF	Old Format
**Savoonga Readiness Center	See Lat/Long	63.69538	-170.48277	MS Word Adobe PDF	Old Format
Scammon Bay Readiness Center	See Lat/Long	61.84158	-165.58143	MS Word Adobe PDF	Old Format
**Selawik Readiness Center	See Lat/Long	66.6022	-160.00345	MS Word Adobe PDF	Old Format
Shungnak Readiness Center	See Lat/Long	66.88769	-157.1385	MS Word Adobe PDF	Old Format

**Sitka Readiness Center	1508 Sawmill Creek Road, Sitka, AK, 99835	57.04648	-135.30041	MS Word Adobe PDF	Old Format
**St. Michael Readiness Center	See Lat/Long	63.4783	-162.04137	MS Word Adobe PDF	Old Format
Stebbins Readiness Center	See Lat/Long	63.52431	-162.29112	MS Word Adobe PDF	Old Format
Teller Readiness Center	See Lat/Long	65.26425	-166.36348	MS Word Adobe PDF	Old Format
Togiak Readiness Center	See Lat/Long	59.05135	-160.39502	Adobe PDF	Old Format
Toksook Bay Readiness Center	See Lat/Long	60.53114	-165.11024	Adobe PDF	Old Format
Tuluksak Readiness Center	See Lat/Long	61.10034	-160.95784	Adobe PDF	Old Format
Tununak Readiness Center	See Lat/Long	60.58569	-165.25558	No Existing Plan	N/A
Unalakleet Readiness Center	See Lat/Long	63.87909	-160.79673	MS Word Adobe PDF	Old Format
**Valdez Readiness Center	1 Salcha Way, Valdez, AK, 99686	61.12778	-146.24769	MS Word Adobe PDF	Old Format
Wainwright Readiness Center	See Lat/Long	70.63925	-160.03055	No Existing Plan	N/A

Attachment B:
Spill Prevention, Control and Countermeasure (SPCC) Plan Outline

Cover – “Quick Reference” Table of Contents

Emergency Contact Numbers

Installation Spill Contingency Plan

Part 1 – How to Comply

i.e. maintenance of SPCC, roles and responsibilities, how to respond to spills/spill response procedures, notification procedures.

Part 2 – Certifications

i.e. management approval, professional engineer certification, certification of applicable substantial harm criteria.

Part 3 – Facility Information

i.e.: site description, fuel storage/tank inventory, description of tank characteristics, potential spill and predicted flow, discharge prevention, security, countermeasures.

Part 4 – Diagrams and Maps

Part 5 – Regulatory Cross-Reference

Part 6 – How to Inspect

i.e. SP001 inspection protocols, including integrity testing requirements (each tank must be evaluated to determine if it has continuous-release detection methods and release-protection barriers to determine their Steel Tank Institute SP001 tank inspection category)

Part 7 – How to Discharge Water and Remove Snow from Secondary Containment Areas

Part 8 – How to Train Personnel

Part 9 – How to Update and Amend SPCC Plan

Part 10 – How to Manage Mobile Refuelers and Portable Storage Units

Attachments:

Alaska Department of Environmental Conservation and Spill Notification Form
Containment Dewatering Log
Secondary Containment Area Calculations
SPCC Personnel Training Form
SPCC Personnel Training Log Sign-in Sheet
SPCC Plan Revision/Annual Review Log



September 19, 2023

Bryant Army Aviation Support Facility

SUBMITTED TO:
Army National Guard Department of Military and Veteran Affairs
Facilities Management Office

P.O. Box 5800
Joint Base Elmendorf-Richardson, Alaska
99505

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Diagrams and Maps	4
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How to inspect and Test Tank Systems	6
How to Discharge Precipitation from Secondary Containment Areas	7
How to Train Spill Response Personnel	8
How to Update and Amend the SPCC Plan	9
How to Manage Mobile Refuelers and Portable Storage Units	10

Submitted To: Army National Guard Department of Military and Veteran Affairs
Facilities Management Office
P.O. Box 5800
Joint Base Elmendorf-Richardson, Alaska 99505
Attn: Donald Flournoy

Subject: DRAFT SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN,
BRYANT ARMY AVIATION SUPPORT FACILITY (AASF), JOINT BASE
ELMENDORF-RICHARDSON, ALASKA

Shannon & Wilson updated this Spill Prevention, Control and Countermeasure (SPCC) Plan in accordance with our scope of services dated September 9, 2022. These services were authorized in Agreement Number 09-22-054 with the Army National Guard Department of Military and Veteran Affairs Facilities Management Office dated November 27, 2022. This SPCC plan was updated from the January 23, 2020 plan prepared by Nortech, Inc. The revised plan was prepared by the undersigned.

We appreciate the opportunity to be of service to you on this project. If you have questions concerning this report, or we may be of further service, please contact us.

Sincerely,

SHANNON & WILSON

Adam Wyborny, PE
Environmental Engineer

EMERGENCY CONTACTS

As a matter of standard practice, personnel working at the facility are required to follow the spill notification procedures outlined in Section 1.6 of this plan when reporting spills involving oil and other hazardous materials (HAZMAT). However, in the event that someone is injured, immediately summon emergency medical assistance. The primary responsibility for contacting federal and state agencies of spills belongs to the Water Resources Program Manager (WRPM).

Contacts	Phone Number	Event	When to Notify
Initial Notification / Emergency Response	911	Any emergency fire, police, or medical situation	Immediately
Primary Facility Designee	(907) 428-6376	Facility personnel must notify the Primary or Alternate Facility Designee of all discharges	Immediately
Alternate Facility Designee	(907) 428-6370		
WRPM	(907) 428-7151	Notify of all spills of oil and hazardous substances	Immediately
Joint Operations Center (JOC) Staff Duty Officer	(907) 428-7500	Any uncontrolled discharge after normal duty hours	If WRPM isn't available
Joint Base Elmendorf-Richardson (JBER) Hospital	(907) 580-2778	Emergency Room Services	Immediately
Bryant AASF Control Tower	(907) 428-6850	Any emergency fire, police, or medical situation	Immediately
National Response Center (NRC)	800-424-8802	Discharges that reach or threaten navigable waters	Immediately
Alaska Department of Environmental Conservation (DEC)	Daytime: (907) 269-3063 24 Hour: 800-478-9300	Any amount spilled to water, see Section 1.5, discharge thresholds on land.	If to water, immediately. If to land, depends on volume spilled refer to Section 1.6
U.S. EPA, Anchorage Operations Office 222 W. 7 th Avenue, No. 19 Anchorage, AK 99513	Daytime: (907) 271-5083	Spills that cause a sheen on "Waters of the United States"	Within 24 hours by telephone
	24 Hour: (206) 553-1264	Spills > than 1,000 gallons or 2 spills > than 42 gallons in 12 months to navigable waters	Within 60 days in writing

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Appendices

Appendix A: Definitions

Appendix B: SPCC Rule Cross-Reference

Appendix C: DEC Spill Reporting Materials

Appendix D: Forms and Inspection Checklists

Appendix E: Best Management Practices

Appendix F: Secondary Containment Capacity Calculations

ACRONYMS

AAC	Alaska Administrative Code
AASF	Army Aviation Support Facility
ACMs	Active Containment Countermeasures
AKARNG	Alaska Army National Guard
ARNG	Army National Guard
AST	Aboveground Storage Tank
BMP	Best Management Practice
CFMO	Construction and Facilities Management Officer
CFR	Code of Federal Regulations
CRDM	Continuous Release Detection Method
CWA	Clean Water Act
DEC	Alaska Department of Environmental Conservation
DMVA	Department of Military and Veterans' Affairs
DOC	Department of Commerce
DOT	Department of Transportation
EPA	Environmental Protection Agency
ERFS II	Extended Range Fuel System II
FARE	forward area refueling equipment
HAZMAT	Hazardous Materials
HWMP	Hazardous Waste Management Plan
JBER	Joint Base Elmendorf-Richardson
JOC	Joint Operations Center
MFT	Mobile Fuel Truck
MoGas	Gasoline
N/A	Not Applicable
NOAA	National Oceanic and Atmospheric Administration
NRC	National Response Center
OWS	Oil Water Separator
PE	Professional Engineer
POL	Petroleum, Oil and Lubricants
PPE	Personal Protective Equipment
RPB	Release Protection Barrier
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control and Countermeasure
STI	Steel Tank Institute
TPU	Tank and Pump Unit
WRPM	Water Resources Program Manager

1 HOW TO COMPLY

This Spill Prevention, Control and Countermeasure (SPCC) plan has been prepared for the Bryant Army Aviation Support Facility (subject facility) located on Joint Base Elmendorf-Richardson (JBER), Alaska. The SPCC Plan (Plan) specifies the procedures, methods, equipment, and other measures intended to prevent discharge of oil from the subject facility to navigable waters. This SPCC Plan has been developed in a manner that fulfills the applicable requirements of the following:

- Title 40 Code of Federal Regulations Part 112 (40 CFR §112), Oil Pollution Prevention promulgated July 17, 2002 and amended in December 2006, May 2007, and November 2009;
- 40 CFR §300.33, Comprehensive Environmental Response, Compensation, and Liability Act;
- State of Alaska Regulation Title 18 Alaska Administrative Code Chapter 75 (18 AAC 75), Oil and Other Hazardous Substances Pollution Control; and
- Army Regulation 200-1, Section 11-4 b

The regulations require SPCC Plans to follow the sequence specified in 40 CFR §112 or include a section cross-referencing the regulatory sections with the plan sections that address each requirement. A cross-reference table is provided in Appendix B.

The Alaska Department of Environmental Conservation (DEC) requires registration of onshore facilities containing oil storage tanks equal to or greater than 1,000 gallons in capacity as Class 2 facilities. All regulated aboveground storage systems operated by the Alaska Army National Guard (AKARNG) at the Bryant AASF have been registered with the DEC in accordance with the requirements of 18 AAC 75.840.

1.1 Availability of the SPCC Plan

A hard or electronic copy of the SPCC Plan must be available for onsite review by representatives of the U.S. Environmental Protection Agency (EPA) or the DEC during normal working hours. In addition, the onsite copy of this SPCC Plan must be accessible at the facility for all persons responsible for administering elements of the plan.

1.2 How to Maintain Your SPCC Plan

The Facility Manager or their designee will review and evaluate the Plan at least once every five years. This review period will be referenced to the date that this Plan is signed by the

management, which is assumed to be the effective Plan date. Revisions to the plan will be evaluated following each review.

Required actions in this SPCC Plan are summarized in Exhibit 1-1 including personnel responsible for implementing each action.

Exhibit 1-1: Distribution of responsibility for implementing the SPCC Plan.

Action Required	When It's Required	SPCC Plan Reference	Responsibility for Action
Obtain signatures of Manager capable of committing resources necessary to implement this plan as written and certified	Upon receipt of SPCC Plan	Section 2.1	WRPM or designee
Complete the Certification of Substantial Harm Determination Form and obtain signature of Construction and Facilities Management Officer (CFMO)	Upon receipt of SPCC Plan	Section 2.3	CFMO Officer, LTC Marcellus
Initiate the <i>Spill Release Report Form</i>	For each spill	Section 1.6	Spiller
Finalize the <i>Spill Release Report Form</i>	For each spill	Section 1.6	WRPM
Conduct Inspections	Periodically	Section 6.0	Facility Designee
	Annually	Section 6.0	WRPM or designee
Inventory spill response supplies and restock as necessary	Periodically	Section 1.8	Facility Designee
Ensure that all personnel that handle Petroleum, Oil, and Lubricants (POL) have Initial First Responder Awareness Level Training	Within 6 months of being assigned job that involves POL handling responsibilities	Section 8.0	Facility Designee
Conduct First Responder Awareness Level Training Refresher Course	Annually	Section 8.0	WRPM or designee
Inspect secondary containment for accumulated rainwater and snow	Prior to discharge or removal after precipitation event	Section 7.0	WRPM or designee
Record changes to the Plan	As changes are made	Section	WRPM or designee
Record reviews of the Plan	As they occur, but at least annually	Section	WRPM or designee
SPCC Plan Review and Administrative updates	At least once every five years	Section 9.1	WRPM or designee

1.3 Who Is Responsible Within the SPCC Program

This section identifies key personnel with responsibilities related to the SPCC Plan and details their responsibilities for helping to prevent and respond to spills.

Exhibit 1-2: Responsibilities of the Environmental Compliance Team Lead

Environmental Compliance Team Lead	
Training	Ensures annual spill response training has been conducted and all trained employees know where spill response equipment is located.
Administrative	Ensures WRPM has resources necessary to implement this plan as written and certified.

Exhibit 1-3: Responsibilities of the Water Resources Program Manager

Water Resources Program Manager	
Training	<ul style="list-style-type: none"> Provides (or coordinates) annual training to the Facility Designee and oil handling personnel.
Plan Management	<ul style="list-style-type: none"> Evaluates system changes to determine if they affect the SPCC Plan. Establishes procedures and priorities for implementing the SPCC Plan. Coordinates with Facility Designee to review this plan at least once every 5 years. Instructs trained employees to clean up spills with proper equipment and proper procedures. Designates Spill Response Point of Contact at the facility.
Administrative	<ul style="list-style-type: none"> Maintains copies of completed inspection forms and notifies the Environmental Compliance Team Lead if maintenance or repairs are required. Maintains records of all Periodic Inspections, maintenance actions, and repairs associated with aboveground storage tanks and other bulk storage systems for a minimum of 3 years. Maintains annual inspections of bulk storage systems for a minimum of 3 years. Maintains records of all training provided to POL handling personnel for a minimum of 3 years.
Report Spills	<ul style="list-style-type: none"> Reviews and finalizes the Spill Release Report Form initiated by the Facility Designee. If an oil spill is 1 gallon or larger, makes required notifications and reports to state and federal agencies in accordance with threshold discharge volumes defined in Section 1.6 of this plan.
Environmental	<ul style="list-style-type: none"> Conducts or directs the performance of periodic and annual inspections on all AST systems. Ensures environmental protection/pollution prevention procedures are implemented. Assess work areas to make sure employees follow pollution prevention procedures.
Mitigation	<ul style="list-style-type: none"> Provides assistance to Facility Designee needed to ensure that all contaminated soil, gravel, water, snow, ice, and other media contaminated as a result of a spill are properly disposed of in accordance with federal and state regulations. Coordinates contractors who may be needed to clean up major spills that can be handled safely with in-house personnel and resources.
Regulatory	<ul style="list-style-type: none"> Ensures that all regulated tank systems are properly registered with the DEC.

Exhibit 1-4: Responsibilities of the Facility Designee

Facility Designee	
Administrative	<ul style="list-style-type: none"> Coordinates with the WRPM for necessary spill response equipment and supplies. Ensures the WRPM has copies of all documents that are stored on site.
Spill Response	<ul style="list-style-type: none"> Assesses the spill content, source, and amount, then determines if it is a hazard to human health or the environment. Ensures that internal alarms are activated, and the hazard communication system is initiated when there is an emergency. Directs and coordinates spill clean-up activities for incidental spills. Notifies the WRPM of any spill verbally. Initiates Spill Release Report Form (or similar form) and submits the form to the WRPM. Notifies the local fire department, law enforcement, medical services, and the WRPM when appropriate.
Mitigation	<ul style="list-style-type: none"> Coordinates the disposal of contaminated soils, gravel, water, and other media with the Hazardous Waste Program Manager in accordance with the Hazardous Waste Management Plan (HWMP). Coordinates with the WRPM assistance needed to mitigate major spills that cannot be handled safely internally.

1.4 How to Respond to Spills

Spill response actions are required for oil product releases in both contained and uncontained areas. Of particular concern are those discharges that exceed containment capacity, extend into uncontrolled areas, or otherwise pose a potential to reach navigable waters. This section outlines the procedures, materials, methods, and notification requirements following discovery of a release. Under some circumstances, the SPCC plan must be amended following a product release. Plan amendment criteria are specified in Section 9.

1.4.1 Incidental Spills

Incidental spills are day-to-day maintenance spills that facility personnel can safely respond to using available response equipment such as oil-dry absorbent and personal protective equipment (PPE) without endangering the welfare of personnel or endangering the environment.

NOTE:

- Typically, oil spills confined to a paved surface (asphalt or concrete) that are small enough to step across are considered incidental spills. This general rule only applies to oil spills, not other hazardous materials (HAZMAT). For safety reasons, **do not attempt** to step across the spill when making this assessment.
- All oil and HAZMAT spills must be reported to the WRPM immediately upon discovery.

For all incidental oil spills (typically less than 20 gallons), facility personnel will complete the steps in the *General Spill Response Procedures* contained in Section 1.5 of this plan. The *Spill Release Report Form* in Appendix C (or similar form) will be initiated by Facility Designee and completed by the WRPM before being submitted to the DEC in accordance with the notification requirements provided in Section 1.6 of this plan. The Facility Designee or alternate will report all oil and HAZMAT spills to the WRPM immediately upon discovery.

1.4.2 Major Spills and other Uncontrolled Emergencies

Major spills are typically greater than 20 gallons or spills that the Facility Designee **cannot** respond to without endangering the welfare of personnel or the environment. Spills that enter a waterway or pose an emergency, such as fire and explosions, are considered major spills. Alaska Army National Guard (AKARNG) personnel are not trained or equipped to directly handle major spills.

For all major spills and other uncontrolled emergencies, facility personnel will complete the *General Spill Response Procedures* detailed in Section 1.5 of this plan if it is safe to do so. The Facility Designee will follow internal notification procedures outlined in Exhibit 1-4 and the WRPM will notify the federal, state, and local agencies listed on page ii, as necessary.

1.4.3 Spill Response and Cleanup Contractors

The State of Alaska procurement process is used to contract spill cleanup services for any spill that is beyond the capabilities of AKARNG personnel. In the event of a major spill that requires emergency response, coordination through the Joint Operations Center (JOC) or approval from the Deputy Commissioner or above is used for contract spill cleanup service procurement.

1.5 General Spill Response Procedures

The general spill response procedure for this facility is outlined below. This protocol is intended as a generic guideline, recognizing that the actual response will be dictated by the specific circumstances. It is emphasized that the responder's primary responsibility throughout this process is to conduct work in a safe manner, using the appropriate PPE.

- Survey the Scene - Evaluate the site to identify unsafe conditions. Eliminate potential spark sources, provided it can be accomplished safely. Determine appropriate PPE for conducting the response effort.
- Identify and Stop Release Source - Examples include cutting power to automated systems, switching off pumps, closing valves, and discontinuing manual product

- transfers. If necessary, contact the fuel supply vendor to pump the tank or otherwise address the discharge source.
- Assess the Product Release - Based on the initial observations, estimate the released product's volume, containment, and flow direction. Predict whether the release poses an immediate risk of impacting surface or groundwater.
 - Notification - Initiate the notification process in accordance with Section 1.6 of this Plan.
 - Initiate Product Recovery - Deploy materials and conduct response efforts to contain and recover discharged product. In accordance with 112.8(c)(10), visible discharges from the facility's tank(s) will be promptly corrected.
 - Dispose of Impacted Media - The response effort will likely generate impacted media, including used response materials, recovered product, collected water, and/or excavated soil. Disposal of these media should be conducted in accordance with applicable State regulations, as outlined in 18 AAC 75.
 - Replace Used Response Materials – Materials used to respond to a spill should be replaced immediately with new materials to respond to future events, if necessary. Refer to Section 1.8.1 for guidance on procurement.

Exhibit 1-5: DMVA Installation Spill Contingency Plan

DMVA INSTALLATION SPILL CONTINGENCY PLAN

CAN YOU CLEAN UP WITH THE MATERIALS AND PERSONNEL YOU HAVE ON HAND?

This includes a leak, fuel spill, or a finding of fuel-stained soil.

YES

Incidental Release

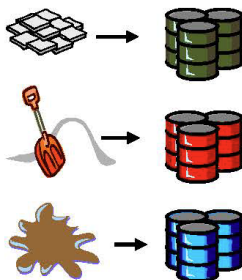


Put on personal protective equipment, such as gloves and goggles, found in the spill response kits.

Remove ignition sources and avoid vapors.



Stop flow of spill by closing valves, up-righting container, or creating a berm with boom, dirt, or snow. (See page 3 for location of piping shut-off valves.)



Place pooled material and contaminated sorbent, snow, soil, and debris into 55-gallon drum(s) or onto plastic sheeting using non-sparking tools. This should be done as quickly as is feasible after a spill to prevent further migration of oil.

Label drum(s). Example:



Contact AKARNG/DMVA Environmental Office to arrange for disposal: (907) 428-7182.

Use the adjacent notification chart for spill reporting once the spill response is complete.

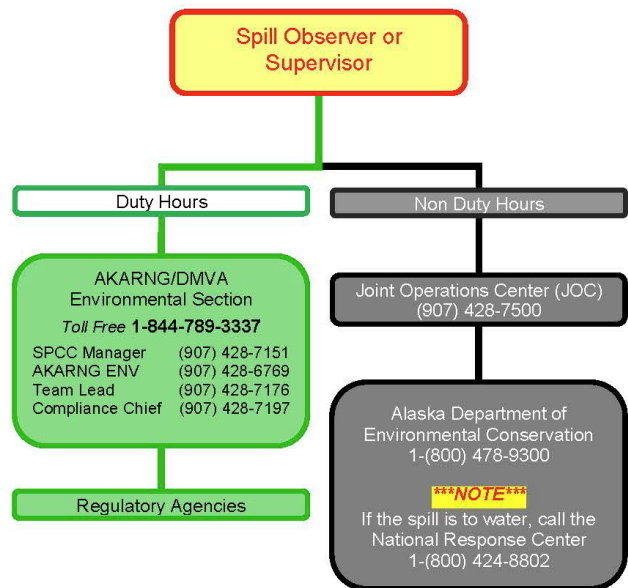
NO

Uncontrolled Release

Evacuate Personnel if Necessary.



Use the following flow chart to notify Chain of Command and Environmental Section.



Do not leave only a voice mail. Notification is not complete until speaking with a person. AKARNG Environmental Office will contract outside resources for cleanup when necessary.

1.6 Spill Notification Procedures

If a spill occurs, the Facility Designee must ensure that appropriate response actions are taken to safeguard the welfare of personnel and to minimize the potential impact to the

environment. Guidelines that personnel should follow when responding to spills are provided in the spill response procedures as described in Section 1.5 of this plan.

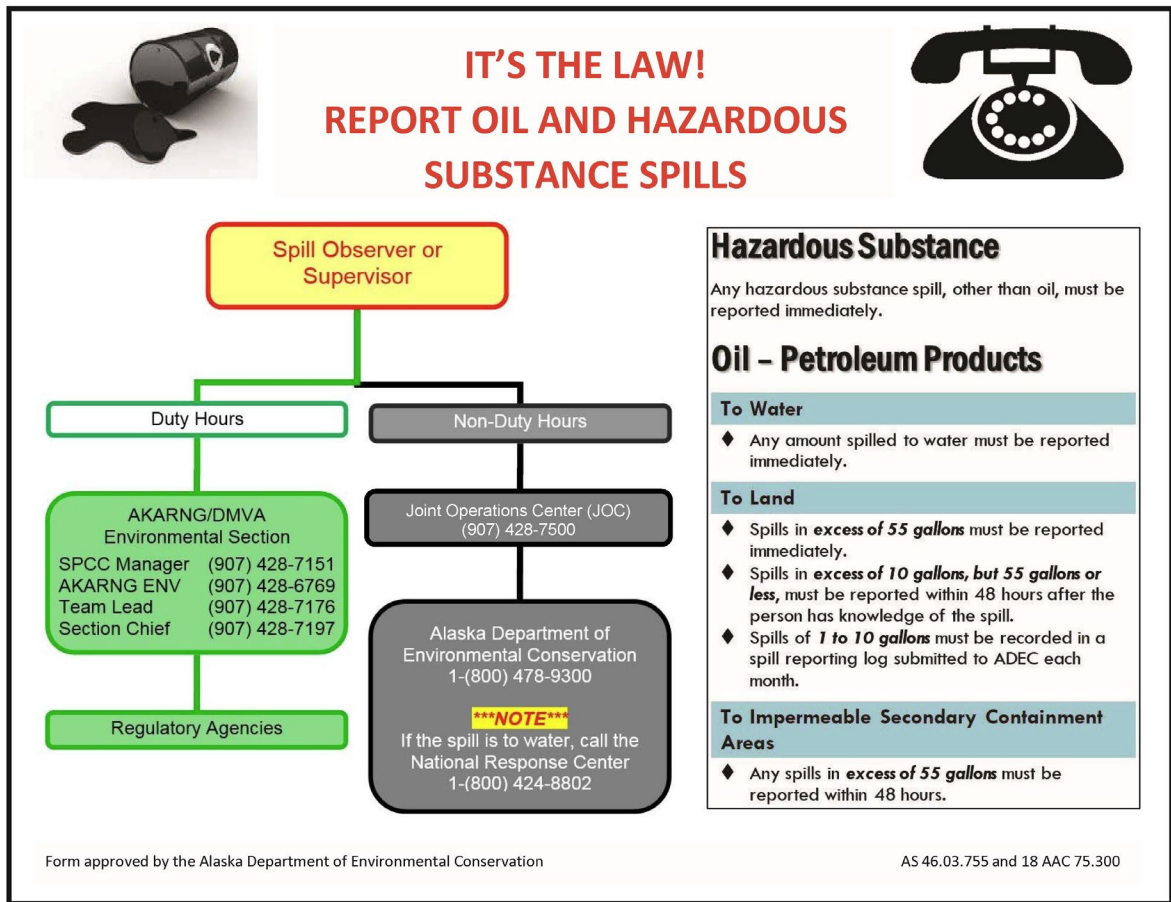
NOTE: Immediately contact the fire department for emergency assistance if the spill cannot be terminated or if there are hazards associated with the spill that may pose an immediate danger to the health of facility personnel, people in the vicinity of the facility, or the environment.

Once the initial response to the spill has been completed, the Facility Designee will notify the WRPM of any spill of oil or other HAZMAT. The WRPM will complete the following steps to ensure that all appropriate regulatory agencies are notified.

1. The Facility Designee will provide the WRPM with information pertaining to the spill. The information will include at a minimum the following details:
 - a. Facility address and phone number;
 - b. Location, date, and time of spill;
 - c. Type and estimated volume of product spilled;
 - d. Status of the spill (i.e., ongoing, source secured);
 - e. Discharge source(s);
 - f. Cause of the spill;
 - g. Known and potentially impacted media;
 - h. Damages and/or injuries caused by the release;
 - i. Who reported the spill and what agencies and organizations have been notified; and
 - j. Cleanup, disposal and site remediation actions taken.
2. The Facility Designee will initiate the *Spill Release Report Form* and will forward it to the WRPM by email at akarng.environmental@alaska.gov.
3. The WRPM or designee will notify the DEC of spills and releases in accordance with 18 AAC 75.300. The WRPM or designee will notify JBER Environmental 673d CES of spills and releases; this notification may come through several different channels, including contacting the JBER Spill Response Manager directly at (907) 384-2478, or calling 911.

NOTE: Notification phone numbers and spill-threshold volumes are provided on the quick reference sign illustrated on the following page. Copies of this quick reference sign should be posted strategically at the facility.

Exhibit 1-6: Spill Reporting Quick Reference Sign



4. The WRPM or designee will notify the EPA Region 10 and the National Response Center (NRC) of any spill that leaves the facility, causes sheen on surface waters, or poses other potential threats to environment, health, or safety. Notify EPA Region 10 and the NRC by the numbers provided on pages ii and 8 of this plan. Details of the report are defined in 40 CFR §112.7(a)(4) and include the following:
 - a. Exact location and address: **61°15'55.80" N, 149°40'16.49" W (World Geodetic System of 1984), P.O. Box 5800, JBER, Alaska, 99505;**
 - b. Phone number of the facility: **(907) 428-6376;**
 - c. Date and time of the discharge;
 - d. Type and estimated quantity of material discharged;
 - e. Source and cause of the discharge;
 - f. Description of all affected media;
 - g. Any damages or injuries caused by the discharge;
 - h. Actions being undertaken to stop and/or mitigate the effects of the discharge;

- i. Whether evacuation is warranted; and
 - j. Names of individuals and/or organizations who have been contacted.
5. The WRPM or designee will provide a written report to the EPA Region 10 within 60 days, if the discharge is more than 1,000 U.S. gallons of oil in a single event or a discharge of more than 42 U.S. gallons of oil in each of two discharges, occurring within any 12-month period. Details of the report are defined in 40 CFR §112.4(a) and include the following:
 - a. Name of the facility: **Bryant AASF**;
 - b. Name of the WRPM;
 - c. Location of the facility: **JBER, Alaska**;
 - d. Maximum storage or handling capacity of the facility and normal daily throughput;
 - e. Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
 - f. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
 - g. The cause of the discharge as described in 40 CFR §112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;
 - h. Additional preventative measures taken or planned to minimize the possibility of recurrence; and
 - i. Any other information the EPA Region 10 may reasonably require pertinent to the Plan or discharge.

1.7 Onsite Coordinator

The Facility Designee will serve as the on-site coordinator. AKARNG personnel that work at the facility only receive First Responder Awareness Level training. As such, they are only authorized to respond to incidental spills of POL and/or HAZMAT that do not pose a significant risk to their health or the environment.

1.8 Spill Response Equipment

Exhibit 1-7 contains a recommended inventory of spill response equipment and supplies; this recommended inventory can serve as a guide when stocking spill kits within the facility. At all times, maintain spill equipment and supplies needed to respond to a 55-gallon spill, and smaller spills that could occur as a result of daily operations. Ensure compatible materials are on-hand to respond to POL, acid, base, or unknown material spills. It is the responsibility of the WRPM to periodically restock missing supplies. Supplies will vary based on availability and preference of onsite personnel.

1.8.1 How to Order Spill Response Supplies

Emergency spill-response equipment may be ordered by contacting the WRPM. As a general rule and best management practice (BMP), spill response equipment is primarily maintained in facility buildings, hangars, POL storage areas, and adjacent to fueling and oil-dispensing operations associated with storage tank systems.

Exhibit 1-7: Spill Response Materials

Personal Protective Equipment	Spill Response Equipment	Consumable Response Supplies
<ul style="list-style-type: none"> ▪ Tyvek Suits ▪ Nitrile Gloves ▪ Safety Boots or Boot Covers ▪ Goggles and/or Face Shield ▪ Duct Tape ▪ Half-Face Respirator as needed 		<ul style="list-style-type: none"> ▪ Absorbent Pads and Pillows ▪ Absorbent Boom ▪ Granular Absorbent (e.g., oil-dry) ▪ Oily Waste Bags ▪ Caution Tape
	<ul style="list-style-type: none"> ▪ Overpack Drums ▪ 5-Gallon Containers ▪ Rakes and Push Brooms ▪ Non-Sparking Shovels ▪ Drain Covers 	
Fire Extinguisher Systems	Alarm Systems (Indoor and Outside)	Decontamination Material
<p>Multiple fire extinguishers are strategically located throughout the facility.</p>		<p>Eye wash stations are strategically located in areas where HAZMAT, waste, and POL are handled.</p>
	<p>The facility intercom system is the primary indoor alarm system, and cell phones are used to alert people outdoors.</p>	

2 CERTIFICATIONS

The following certifications are required before this plan may be implemented at the facility.

2.1 Management Certification

In accordance with 40 CFR §112, the responsibility for oil spill control at the Bryant AASF has been assigned to the undersigned. The AKARNG is committed to providing the manpower, equipment, facilities, and materials required to establish precautionary measures and to expeditiously control and remove any harmful quantity of oil or hazardous substances discharged from the Bryant AASF.

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

X

LTC Eric Marcellus, CFMO

2.2 Professional Engineer Certification

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the Code of Federal Regulations (40 CFR §112) and attests to the following:

- i. That the engineer has visited and examined the facility, or has supervised the examination of the facility by an appropriately qualified person;
- ii. 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;
- iii. The SPCC plan includes provisions for conducting the inspections and testing required by 40 CFR §112; and
- iv. That this SPCC Plan is adequate for the facility [40 CFR §112.3(d)].

X

Adam Wyborny, PE
Licensed Professional Engineer

2.3 Certification of the Applicability of the Substantial Harm Criteria, 40 CFR § 112, Appendix C

If there is a “Yes” answer to one or more of the five questions in Exhibit 2-1, then an EPA Facility Response Plan is required.

Exhibit 2-1: Applicability of Substantial Harm Criteria

Facility Name: Bryant Army Aviation Support Facility		
Facility Address: P.O. Box 5800, Joint Base Elmendorf-Richardson, Alaska 99505		
Does the facility have an oil storage capacity that is greater than or equal to 42,000 gallons and conduct operations that include over-water transfers to or from vessels?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does facility have an oil storage capacity greater than or equal to one million gallons, and does the facility lack secondary containment sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation with any aboveground storage area?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does facility have an oil storage capacity greater than or equal to one million gallons, and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III in Appendix C to 40 CFR Part 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see appendices I, II, and III to Department of Commerce/National Oceanic and Atmospheric Administration’s (DOC/NOAA) “Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments” (see Appendix E of 40 CFR Part 112 Section 13, for availability) and the applicable Area Contingency Plan.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does facility have an oil storage capacity greater than or equal to one million gallons, and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III in Appendix C to 40 CFR Part 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does facility have an oil storage capacity greater than or equal to one million gallons, and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

1 If a comparable formula to the one referenced is used to establish the appropriate distance to sensitive environments or drinking water intakes, documentation of the reliability and analytical soundness of that formula must be provided.

I certify under penalty of law that I 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.

X

LTC Eric Marcellus, CFMO

3 FACILITY INFORMATION

This section provides descriptions of the subject facility’s use, location, environmental setting, and oil storage and distribution components. Unless otherwise indicated, the site descriptions are based on Shannon & Wilson’s June 30, 2023 site visit. Changes in site conditions or facility operation implemented after this date will be reflected in plan revisions, using the amendment procedures specified in Section 9.2 of this Plan.

3.1 Facility Description

The Bryant AASF is operated by the Alaska Army National Guard and is located on JBER. The military base is located adjacent to and northeast of Anchorage, Alaska.

Exhibit 3-1: Facility Features and General Use Cases

Current Facility Description	
Site Description:	
Approximately 491 acres of developed airfield property. The facility stores and transfers petroleum products to include diesel, oil-based lubricants, used oil, and Jet A fuel in containers that are 55 gallons or larger at numerous buildings (Bldgs.). An inventory of the bulk storage tanks and containers is provided in Section 3.2. The storage of diesel at the AASF is for powering pumps at the deluge system.	
Facilities:	
<ul style="list-style-type: none"> ▪ Hangar 1 (Bldg. 47430) ▪ Hangar 2 (Bldg. 47433) ▪ Hangar 4 (Bldg. 47431) ▪ Hangar 6 (Bldg. 47427) ▪ Ground Support (Bldgs. 47428 and 47429) 	<ul style="list-style-type: none"> ▪ Tank Farm (Bldg. 47438) ▪ Deluge System (Bldg. 47436) ▪ Control Tower (Bldg. 48000) ▪ Flight Operations (Bldg. 47420) ▪ Taxi aprons and runways
Industrial Activities:	
<ul style="list-style-type: none"> ▪ Ground support ▪ Aircraft and equipment fueling ▪ Fuel storage and consumption ▪ Aircraft maintenance 	<ul style="list-style-type: none"> ▪ Used oil accumulation ▪ Underground Jet A fuel storage and truck loading rack ▪ Runway de-icing (Cryotech E-36 Liquid Runway De-icer, Potassium-Acetate based)

Bryant AASF is a facility with multiple locations that provide aviation support. The bulk supply of diesel fuel stored in an AST for consumptive use is located next to the building housing the deluge system (Bldg. 47436). Descriptions of the various oil storage tanks and containers is provided in this section.

Drum Storage in Hazmat Locker at Hangar 1

- Locker located near southeast corner of building.
- Used for storing 55-gallon drums of oils when needed.
- Maximum number of drums: 4
- Secondary containment provided by integral sump with a capacity of 124 gallons per manufacturer information.

**Extended Range Fuel System II (ERFS II) Bladder Tank in Hangar 1**

- Portable modular forward area refueling equipment (FARE) system designed to be mounted to chinook helicopter.
- Nominal capacity: 800 gallons maximum per tank.
- Fuel quantity can be accurately monitored in flight within four percent of the actual quantity using the liquid level indicators.
- The ERFS II fuel tank assembly consists of an outer aluminum honeycomb and fiberglass shell container, ballistically self-sealing bladder, pumping module, fuel hose, vent hose assembly, and ground cable.
- Stored empty when not in use.

**Combination Heater/Light Plant/Generator at Hangar 2 Storage Yard**

- Nominal capacity of fuel tank: 90 gallons
- Fill port is on the exterior of the generator cabinet.
- Fuel is delivered by fuel truck.
- Fuel transfers are contained within the cabinet unit; there is no external fuel transfer piping associated with the unit.
- Unit is stored outside the Hangar 2 when not in use.
- General and sized secondary containment provided by integral containment pan – manufacturer reports that pan is designed to provide 110% capacity (i.e., 99 gallons).



Drum Storage Hazmat Locker at Hangar 4

- Locker located near southeast corner of building.
- Used for storing 55-gallon drums of oils when needed.
- Maximum number of drums: 4
- Secondary containment provided by integral sump capacity of 140 gallons per manufacturer information.



Drums of New/Used Oil in Hangar 4

- Shop-built, single-use 55-gallon drums.
- Stored inside hangar building in aircraft maintenance area.
- Maximum number of drums: 4
- Sized secondary containment provided by spill pallets or hangar floor and trench/drain/sump drainage system which has a capacity of 953 gallons (see Appendix F for calculations).
- Full drums may be picked up by a waste contractor for recycling.



ERFS II Bladder Tanks in Hangar 4

- Portable modular FARE system designed to be mounted to chinook helicopter.
- Nominal capacity: 800 gallons maximum per tank (x9).
- Fuel quantity can be accurately monitored in flight within four percent of the actual quantity using the liquid level indicators.
- The ERFS II fuel tank assembly consists of an outer aluminum honeycomb and fiberglass shell container, ballistically self-sealing bladder, pumping module, fuel hose, vent hose assembly, and ground cable.
- Stored empty when not in use.



Aircraft Fuel Pods in Hangar 4

- Various aircraft fuel pods rotate between JBER, Nome, and Bethel. While not all present at the same time, the inventory is as follows:
 - 28 Helicopter Fuel Pods (200 gallons)
 - 10 Extended Range Fuel Systems with remote fuel management system (RFMS) (200 gallons)
 - 6 Extended Range Fuel Systems RFMS (500-gallons)
 - 6 Extended Range Fuel Systems RFMS (800-gallons)
- Made of a composite material compatible with fuel type.
- Fuel pods are stored empty when not installed on aircraft.
- Secondary containment is provided by hangar floor and Active Containment Measures (ACMs) from nearby spill kits.
- Pods are clearly marked as empty when stored in hangar.



Used Oil Tank in Hangar 6

- One single-wall, rectangular, UL 142 listed tank.
- Nominal capacity: 100 gallons
- Filled by manual transfers from small containers.
- Copper piping connects to a used oil burner/heater that is mounted above the tank.
- Secondary containment provided by shallow pan, concrete hangar floor and building walls.
- The 1,000 square foot room has a gross containment capacity of 312 gallons for a spill depth of 1/2-inch (calculation included in Appendix E); however, two floor drains in the room connect to JBER's sanitary sewer system.
- Corrective action is required to install a secondary containment basin with a capacity of at least 110 gallons (see Section 3.9 for compliance schedule).



Drums of New/Used Oil in Hangar 6

- Shop-built, single-use 55-gallon drums.
- Stored inside hangar building in aircraft maintenance area or by the Used Oil storage tank.
- Maximum number of drums: 7
- Sized secondary containment provided by spill pallets or hangar floor and trench/drain/sump drainage system which has a capacity of 5,785 gallons (see Appendix F for calculations).
- Full drums are picked up by a waste contractor for recycling or oil is transferred to Used Oil tank for burning/heating purposes.



Drum Storage in Hazmat Locker at Hangar 6

- Locker located adjacent to south wall of building.
- Used for storing 55-gallon drums of oils when needed.
- Maximum number of drums: 6
- Secondary containment provided by integral sump capacity of 140 gallons per manufacturer information.



Portable Generators 2, 3, and 4 at Ground Support Bldg. No. 47428

- Nominal capacity of fuel tank: 65 gallons
- Fill port is protected by being located within the generator cabinet.
- Fuel is delivered by fuel truck.
- Fuel transfers are contained within the cabinet unit; there is no external fuel transfer piping associated with these units.
- Units are stored inside the Ground Support building when not in use.
- Sized secondary containment provided by the Ground Support building floor and floor drain when parked inside building.
- The floor drain has capacity of 53 gallons (see Appendix F for calculation).
- The 1600 square foot floor has a gross containment capacity of 499 gallons for a spill depth of 1/2-inch (see calculation in Appendix F), therefore, a release of 65 gallons is unlikely to escape the building.
- External secondary containment basins to be employed when units are in use outside building along with frequent monitoring so ACMs can be deployed if a release occurs.



Drums of Used Oil at Ground Support Bldg. No. 47429

- Shop-built, single-use, 55-gallon drums staged under building canopy.
- Maximum number of drums: 6
- Secondary containment provided by external spill pallets with capacities of at least 55 gallons (typically 60 to 70 gallons per pallet).
- Additional containment provided by the containment basin at the back of the building with a capacity 10,487 gallons (see Appendix F).



Mobile Fuel Trucks (MFTs) at Ground Support Bldg. No. 47429

- Eight trucks total.
- Nominal capacity of each tanker: 2,500 gallons
- MFTs are filled at the Tank Farm truck rack.
- Trucks are parked in covered area provided by Ground Support building canopy when not in active use.
- General secondary containment provided by concrete containment basin when parked; paved surface slopes towards basin located at back of building.
- Containment basin has a capacity of 10,487 gallons (see Appendix F for calculations).
- General secondary containment provided by deployment of ACMs when transfer operations are occurring.

**Tank 1 AST for Deluge System Building No. 47436**

- One ANSI/UL 142 listed, self-diked tank built by Greer Tank, Inc.
- Stores fuel for powering the system pumps.
- Nominal capacity: 500 gallons
- Secondary containment dike capacity: 780 gallons
- The fill pipe is protected with an overflow bucket.
- The primary tank is vented to the atmosphere.
- The tank is equipped with a direct-read Kruger-type liquid level gauge.
- Interstice between primary tank and interior dike walls/floor can be inspected visually from several openings.
- Skids rest on a concrete pad.
- Fuel is transferred between the AST and the pumps inside the Deluge System Building through 1-inch diameter steel supply and return piping.
- Piping is overhead and suction-fed. If a leak occurs in the piping, the suction in the piping system will break down and fuel flow between the AST and the pumps will stop.
- Flexible connector pipes allow for expansion and contraction of the piping and for tank settling.
- Piping is adequately supported at the tank and bracketed to the building wall with steel channel supports.
- Pipe supports will be inspected monthly and include monitoring for abrasion and corrosion where supports contact piping.
- Manual ball valves in the fuel piping network can be closed to isolate piping sections in the event of damage or a release.
- The height of the piping above the ground surface makes it inaccessible to vehicles and foot traffic; spotters will be used if equipment must operate closely to tank location.
- Piping is pressure tested when installed and if modified or repaired.



Generator 1 - Emergency Power for Control Tower Bldg. No. 48000

- One UL 142 listed tank with integral secondary containment (double-wall base tank).
- Manufactured by CAB Construction of Mankato, Minnesota in 2012.
- Nominal capacity: 240 gallons
- Secondary Containment capacity: 339 gallons based upon dimensions of outer tank (see Appendix F for calculation).
- Fill port is protected and secured by being located within the locked generator cabinet.
- Fuel is delivered by fuel truck following fuel transfer SOP (see BMP Fact Sheet in Appendix E).
- Fuel transfers are contained within the cabinet unit; there is no external fuel transfer piping associated with the generator.



Truck Transfer Rack at Fuel Tank Farm

- Rack has a loading arm.
- Concrete containment structure provides sized secondary containment during transfer operations to fill MFTs.
- Concrete containment area dimensions: 12' W x 80' L x 9" H with sloped ramps on each end.
- The gross containment capacity is 4,679 gallons (see calculations in Appendix F) or 187% of the MFT capacity.
- Containment sump with gate valve for dewatering; valve is kept closed except during manual drainage operations.
- Accumulated rainwater is typically allowed to evaporate as long as the depth is less than 3.5 inches (see Section 7.0 for more information).
- When drainage of accumulated rainwater is necessary, water is inspected for sheen prior to discharging and discharge records will be maintained using the form in Appendix D.
- The facility will provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/un-loading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.
- Operators closely inspect and adjust the lowermost drain and all outlets of MFTs prior to filling and departure to prevent liquid discharge while in transit.
- Aboveground piping for the Truck Transfer Rack is subject to SPCC requirements in §112.8(d). The aboveground piping is 3-inch diameter steel pipe with welded and bolted flange joints and corrosion protection.
- The piping between the Tank Farm building and truck rack is protected from vehicles by bollards; vehicles will be verbally warned of piping or signs posted.
- The piping is adequately supported, and pipe supports will be inspected monthly and include visual monitoring for abrasion and corrosion where supports contact piping.
- Manual valves can be closed to isolate piping sections in the event of damage or a release.
- The piping is pressure tested when installed and if modified or repaired.
- Piping that is not in service will be capped and labeled as to its origin



UST # 1, 2 & 3 at Fuel Tank Farm

- Three underground storage tanks (USTs) located at the Tank Farm for Jet A fuel storage.
- Tank capacity: 30,000-gallon each
- The tanks are regulated under DEC UST program regulations in 18 AAC 78 in accordance with 40 CFR Part 280 requirements, so the USTs are not subject to SPCC requirements.



- Overfill protection is provided from a direct reading electronic monitoring system that includes a high-level alarm that will trigger at two locations at the tank farm (on side of building and on security fence).

- Aboveground piping associated with the USTs is not regulated under DEC's UST program regulations contained in 18 AAC 78 and, therefore, is subject to SPCC requirements in §112.8(d).



- The aboveground piping is 3-inch diameter steel piping with welded and bolted flange joints.
- The piping is coated for corrosion protection.
- The piping between the Tank Farm building and USTs is protected from vehicles by bollards.
- The piping is adequately supported, and pipe supports will be inspected monthly and include monitoring for abrasion and corrosion where supports contact piping.
- Manual valves can be closed to isolate piping sections in the event of damage or a release.
- The piping is pressure tested when installed and if modified or repaired.
- Piping that is not in service will be capped and labeled as to its origin.

UST No. 4 at Fuel Tank Farm

- This UST is used for storage of used/off-spec Jet A fuel.
- Tank capacity: 1,000 gallons
- Tank is regulated under the DEC UST program regulations in 18 AAC 78 in accordance with 40 CFR Part 280 requirements, so the UST is not subject to SPCC requirements.
- Overfill protection from direct reading electronic monitoring system that includes a high-level alarm that will trigger at two locations (on the building and at the security fence).



- Buried piping associated with this UST is regulated under the DEC UST program regulations and, therefore, it is not subject to SPCC requirements in §112.8(d).

3.2 Tank Inventory

The following table provides a consolidated listing of all oil storage locations at the facility with containers that are 55 gallons or larger, which are subject to the requirements of 40 CFR 112.

Exhibit 3-2: Tank and Container Inventory

Storage Unit (max quantity)	Location	Product Stored	Capacity (gallons)	Container Material	Overfill Protection	Release Detection Method	Secondary Containment
Aboveground Storage Tanks ¹							
Tank 1	Deluge System Bldg.	Diesel	500	Steel ²	Liquid Level Gauge	Visual	Integral Containment (self-diked) ³
Tank 2	Hangar 6	Used Oil	100	Steel ²	Direct Reading Gauge	Visual	Building floor (upgrade required)
Generator 1	North of the Control Tower	Diesel	240	Steel ²	Direct Reading Gauge	Visual	Integral Containment (double-wall)
Generator 2	Ground Support Bldg. No. 47428	Diesel	65	Steel ²	Direct Reading Gauge	Visual	Building floor & trench drain if stored inside
Generator 3	Ground Support Bldg. No. 47428	Diesel	65	Steel ²	Direct Reading Gauge	Visual	Building floor & trench drain if stored inside
Generator 4	Ground Support Bldg. No. 47428	Diesel	65	Steel ²	Direct Reading Gauge	Visual	Building floor & trench drain if stored inside
Combo Heater/Light Plant/Generator	Outside Storage Yard West of Hangar 2	Diesel	90	Steel ²	Direct Reading Gauge	Visual	Integral containment pan
Portable Container Storage Tanks ^{4, 5}							
Mobile Fuel Trucks-MFTs (8 max)	Ground Support Bldg. No. 47429	Jet A	2,500	Steel ²	Direct Reading Gauge	Visual	Localized Containment
ERFS II Bladder Tank (1)	Hanger 1	Empty	800	Composite ²	Direct Reading Gauge	Visual	Localized Containment
ERFS II Bladder Tanks (9 max)	Hanger 4	Empty	800	Composite ²	Direct Reading Gauge	Visual	Localized Containment
Aircraft Fuel Pods	Hangar 4 Interior	Empty	Up to 800	Composite ²	None	Visual	Building floor & spill kits

Storage Unit (max quantity)	Location	Product Stored	Capacity (gallons)	Container Material	Overfill Protection	Release Detection Method	Secondary Containment
Portable Container Storage Tanks ^{4, 5} continued							
Drums (6 max.)	Ground Support Bldg. No. 47429	Used Oil Waste Fuels	55	Steel ²	Visually Monitored	Visual	Localized Containment
Drums (4 max.)	Hangar 1 Hazmat Locker	Lube Oil	55	Welded	Visually Monitored	Visual	Localized Containment
Drums (4 max.)	Hangar 4 Interior	Lube oil, used oil	55	Welded	Visually Monitored	Visual	Localized Containment
Drums (4 max.)	Hangar 4 Hazmat Locker	Various oils	55	Steel ²	Visually Monitored	Visual	Localized Containment
Drums (7 max.)	Hangar 6 Interior	Lube oil, used oil	55	Steel ²	Visually Monitored	Visual	Localized Containment
Drums (6 max.)	Hangar 6 Hazmat Locker	Various oils	55	Steel ²	Visually Monitored	Visual	Localized Containment
Oil-Filled Operational Equipment ^{6, 7}							
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Underground Storage Tanks ⁸							
UST 1,2 & 3	Tank Farm	Jet A	30,000	Unknown	Direct Reading	Unknown	Double Walled
UST 4	Tank Farm	Used Fuel	1,000	Unknown	Direct Reading	Unknown	Double Walled

- 1 All fixed AST systems in operation at the facility that are regulated by the Alaska DEC are constructed in accordance with the UL 142 standard.
- 2 Tank system is compatible with the type of material stored.
- 3 Integral containment has a closed top to deflect rainwater and snow.
- 4 Refer to BMP Fact Sheet provided in Appendix D for guidance relevant to secondary containment for portable storage systems. Sized secondary containment is required for drums and other portable bulk containers such as generators.
- 5 Portable storage containers(i.e., fuel pods, blivets, skids, and drums) that are not permanently assigned to the facility may temporarily be at the facility. Because they are not permanently assigned, they will not appear in this Tank Inventory.
- 6 Oil-filled operational equipment is only subject to general secondary containment standards defined in 40 CFR 112.7(c).
- 7 Several transformers are located at the facility, however, they are owned and maintained by the base utility company (Doyon Utilities). If a release from a transformer is observed, notify the utility.
- 8 Underground Storage Tanks are subject to the requirements of 40 CFR 280; therefore, the USTs are exempt from SPCC planning requirements, but are shown on the facilities diagrams.

The aggregate storage capacity of fixed aboveground and portable ASTs is 31,630 gallons. It does not include 91,000 gallons of underground storage capacity since the four USTs are regulated under other oil pollution prevention programs.

Due to the dynamic nature of National Guard operations, portable storage containers (i.e., fuel pods, blivits, skids, and drums) that are not permanently assigned to the facility may be staged at the facility temporarily. Because they are not permanently assigned, they will not appear in this Tank Inventory, but will be managed in accordance with guidance provided in BMP Fact Sheets D-3 and D-4 provided in this plan.

3.3 Spill Prediction Information

Exhibit 3-3 provides spill prediction information for spill scenarios that are most likely to occur at the facility. The nearest waterway to the facility is Ship Creek, which is located approximately 1.7 miles southwest of the Bryant AASF as illustrated on the Facility Location Map provided in Section 4.1.

Exhibit 3-3: Spill Prediction Scenarios

Storage Unit Description	Product Stored	Maximum Volume (Gallons)	Potential Spill Scenario	Estimated Discharge	Direction of Flow
Tank 1 (Deluge System Bldg.)	Diesel	25	Tank overfill or hose break during loading	25 gpm	East into grassy area and then absorbed into the ground
		500	Damage to tank system	Gradual to instantaneous	
Tank 2 (Hangar 6)	Used Oil	5	Tank overfill	1-5 gpm	Radially from tank. Potential discharge to sanitary sewer if not contained before reaching floor drains
		100	Damage to tank system	Gradual to instantaneous	
Generator 1 (North of Control Tower)	Diesel	25	Tank overfill	25 gpm	Radial from generator pad, may flow southeast into depression in grassy area and be absorbed into the ground
		240	Tank failure or damage	Gradual to instantaneous	
Tank Farm	Jet A	50	MFT overfill during fuel transfer	50 gpm	To east/southeast if outside containment
		100	Leaking valves, joints or fittings on aboveground piping system	50 gpm	North into grassy area and then absorbed into the ground
MFT	Jet A	25	Leaving valves or fittings on refueler open	5 gpm	To low areas where MFT is operating
TPU	Diesel	600	Damage to tank	10 gpm	Rupture could escape containment and flow north of building
TPU	Motor gasoline (MoGas)	600	Damage to tank	10 gpm	
Drum	Used Oil	55	Overtipping of used oil drums during handling	Instantaneous	To low areas where drum is located

3.4 Security and Lighting

All HAZMAT, waste, POL storage, accumulation, and transfer operations at the Bryant AASF occur within the confines of the installation-wide security system for JBER. Access to the base is restricted by security fencing and monitored access gates. Installation security provide routine patrols of the area. There is adequate lighting to illuminate the facility grounds to enable the discovery of spills and to deter vandalism. The base security measures provide equivalent protection to use of locks to prevent unauthorized discharges of oil from facility tanks and containers.

3.5 Overfill Protection and Release Detection

Fixed ASTs must be engineered to prevent discharges. The fixed ASTs are equipped with direct-reading gauges that are constantly monitored by facility personnel during the transfer of product in order to minimize the potential for tank overfill or spillage. TPUs and drums are visually monitored while oils and fuels are transferred. Overfill protection and leak prevention devices are inspected during periodic inspections using the checklists provided in Appendix C or equivalent forms.

3.6 Spill History

There have been three spills reported at the Bryant AASF in the past 36 months that have required notification of the DEC or NRC/EPA Region 10. The first incident was reported to DEC on May 28, 2020 (DEC Spill No. 20239914702). 180 gallons of JP-8 spilled from active-duty Army CH 47 Chinook helicopter onto an asphalt keyhole at Hangar 4.

A second spill was reported on August 28, 2020 (DEC Spill No. 20239924101). Approximately 25 gallons of JP-8 fuel spilled from refueling UH-60L Black Hawk helicopter (sump not fully connected) at Hangar 6.

The third spill was reported on October 27, 2021. Approximately 1 gallon of hydraulic fluid was released from an Apache helicopter.

In accordance with DEC requirements the WRPM maintains a log of oil spills of between 1 and 10 gallons. A copy of this log sheet is submitted to DEC on a monthly basis. The Facility Designee may maintain a copy of completed Spill Release Report Forms in Appendix C of this plan. The WRPM maintains a record of all monthly spill reporting logs and completed Spill Release Report Forms.

3.7 Correcting Visible Discharges

In the event of an incidental spill or minor leaks associated with POLs at the facility, the Facility Designee will ensure that the WRPM is notified and that corrective actions are taken to clean up the release material and to fix equipment that may have caused the spill. Minor repairs may be handled locally; those actions that require additional resources will be coordinated with the WRPM.

3.8 Disposal of Contaminated Materials

In the event of a spill, all contaminated soils, absorbent, and debris should be accumulated and disposed of in accordance with the Hazardous Waste Management Plan (HWMP) that has been developed by the AKARNG. The Facility Designee should coordinate such actions with the WRPM and Hazardous Waste Program Manager.

3.9 Facility Upgrade Schedule

The Facility Upgrade Schedule describes items the facility is required to improve or replace in order to implement the SPCC Plan and to achieve compliance with 40 CFR Part 112, state regulations and Army Regulation 200-1. For each upgrade required:

- Document the date(s) the upgrade is planned; and
- Document the date(s) when the upgrade has been completed.

Exhibit 3-4: Bryant AASF Facility Upgrade Summary

Subject	Items Needed	Reference	Planned Date	Completed Date
Plan amendment	Amend oil storage inventory once emergency generators have been installed at the hangers	112.5	Within 6 months of installing the generators	
Plan amendment	Reassess oil storage inventory once the new hanger has been constructed	112.5	Within 6 months of putting the new hanger into service	
Facility Drainage	Train personnel responsible for transfer of Jet A fuel at truck rack about stormwater management procedures and recordkeeping	112.7 & 112.8(b)	Within 2 months of SPCC Plan certification date	
Facility Drainage	Mark maximum level of stormwater allowed to accumulate in truck rack containment basin (3.5 inches) before manual drainage is required	Recommended Practice	Within 2 months of SPCC Plan certification date	

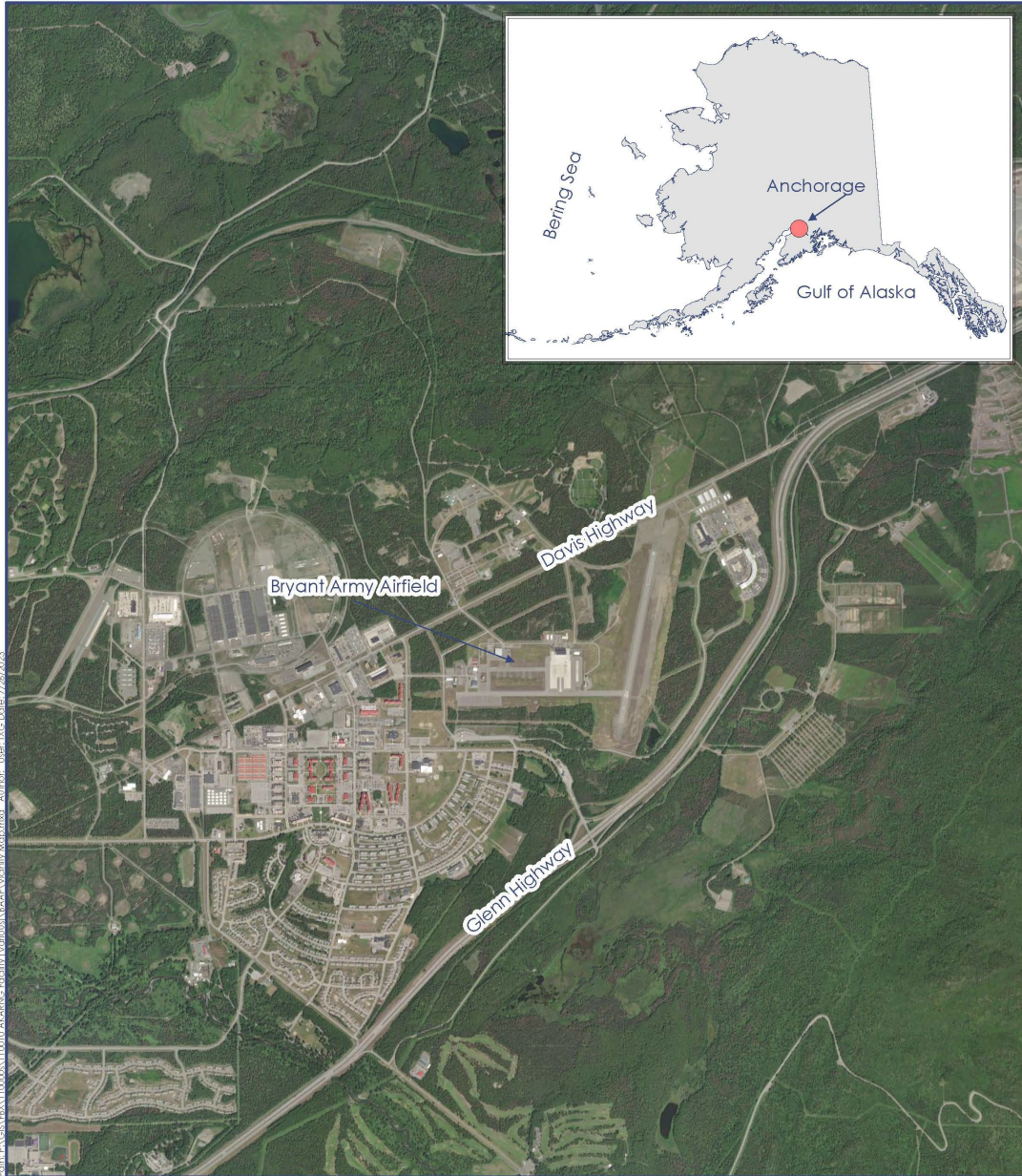
4 DIAGRAMS AND MAPS

The following figures detail the location of the Bryant AASF and the physical layout of the facility.

4.1 Facility Location Map

SHANNON & WILSON
110010

Bryant Army Aviation Support Facility
Spill Prevention Control & Countermeasure Plan
Anchorage, Alaska

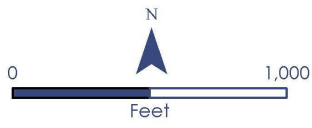
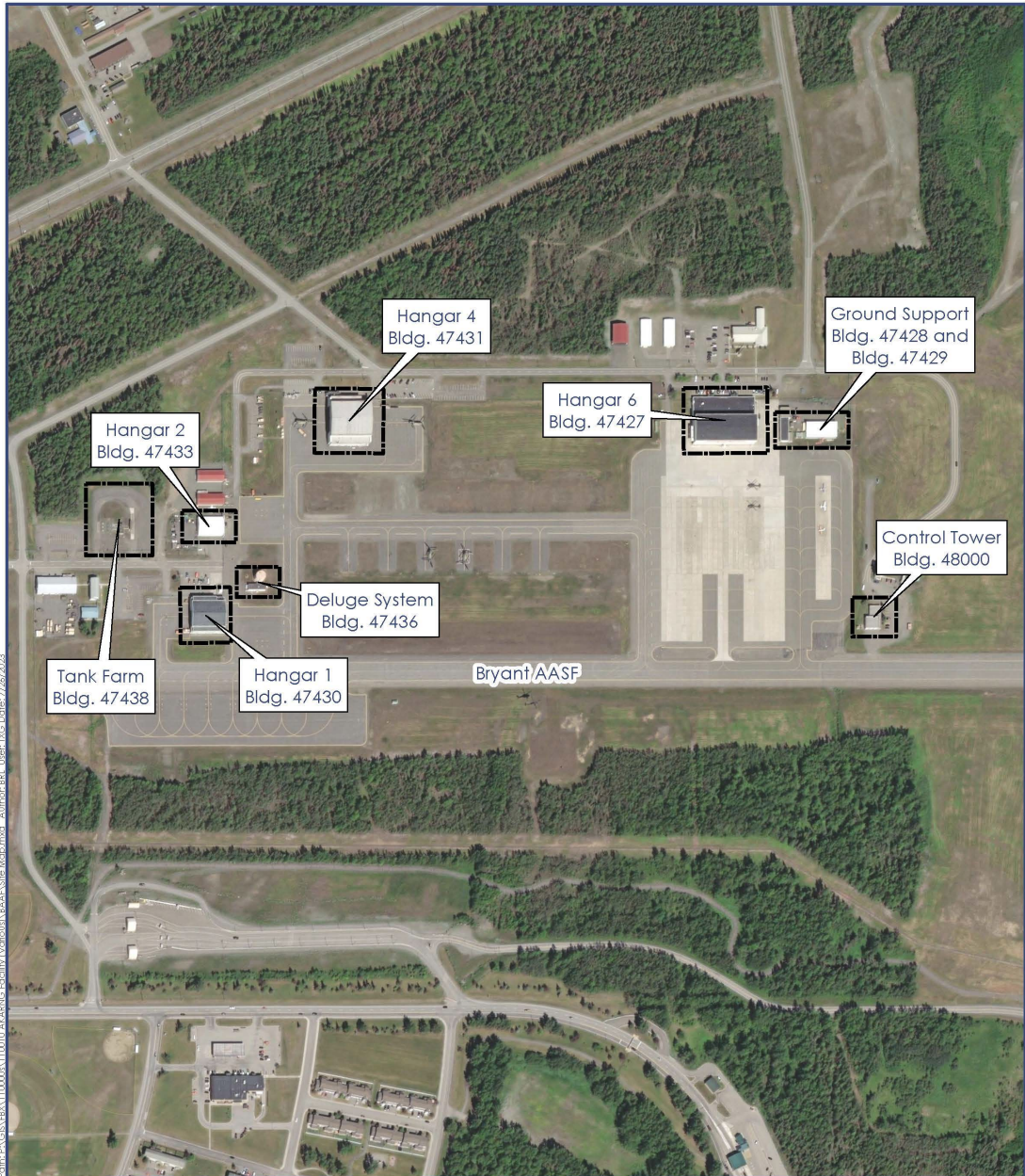


July 2023
VICINITY MAP
Figure 1

4.2 Site Map

SHANNON & WILSON
110010

Bryant Army Aviation Support Facility
Spill Prevention Control & Countermeasure Plan
Anchorage, Alaska



July 2023
SITE MAP
Figure 2

4.2.1 Tank Farm, Hangers 1 & 2 and Deluge System



July 2023
TANK FARM, HANGARS 1 & 2, AND DELUGE SYSTEM
Figure 3

4.2.2 Hanger 6 and Ground Support Buildings

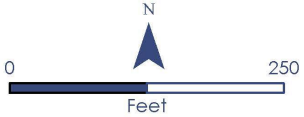
SHANNON & WILSON
110010

Bryant Army Aviation Support Facility
Spill Prevention Control & Countermeasure Plan
Anchorage, Alaska



Path: PACSIS\BVA\110000\110000\AARING Facility\AARING\BAA\Site Diagram\21mod_Author.BRI - User: TCG - Date: 7/26/2023

Imagery provided by Maxar Products, Dynamic Media © 2024 Maxar Inc. Imagery © 2024 Maxar Inc. Alaska Geographic Office, USGS, available: https://geoportal.usgs.gov/portal/home/Item.html?E=600000&S=900000&Z=31&A=0, accessed July 2023.

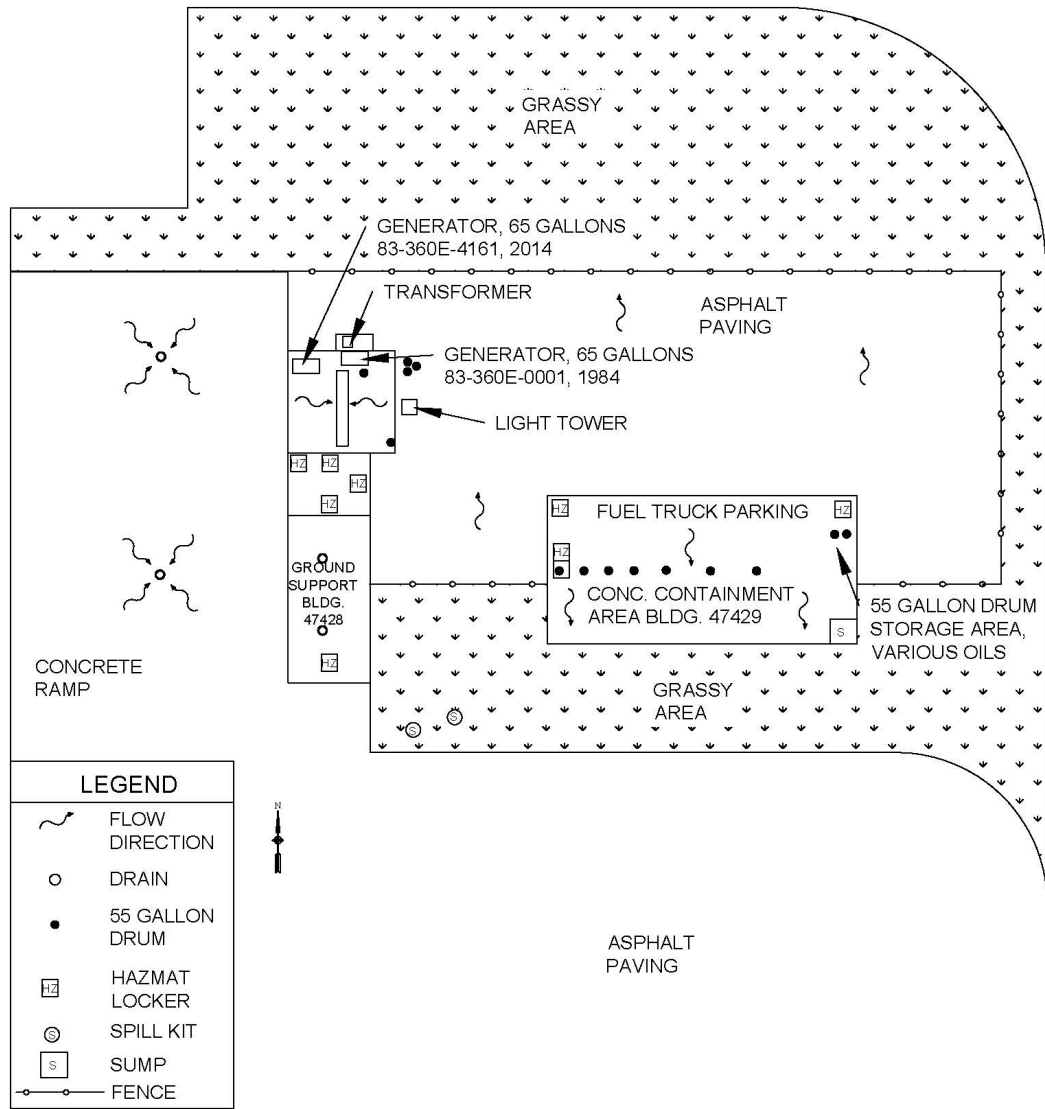


July 2023
HANGAR 6 AND GROUND SUPPORT BUILDINGS
Figure 4

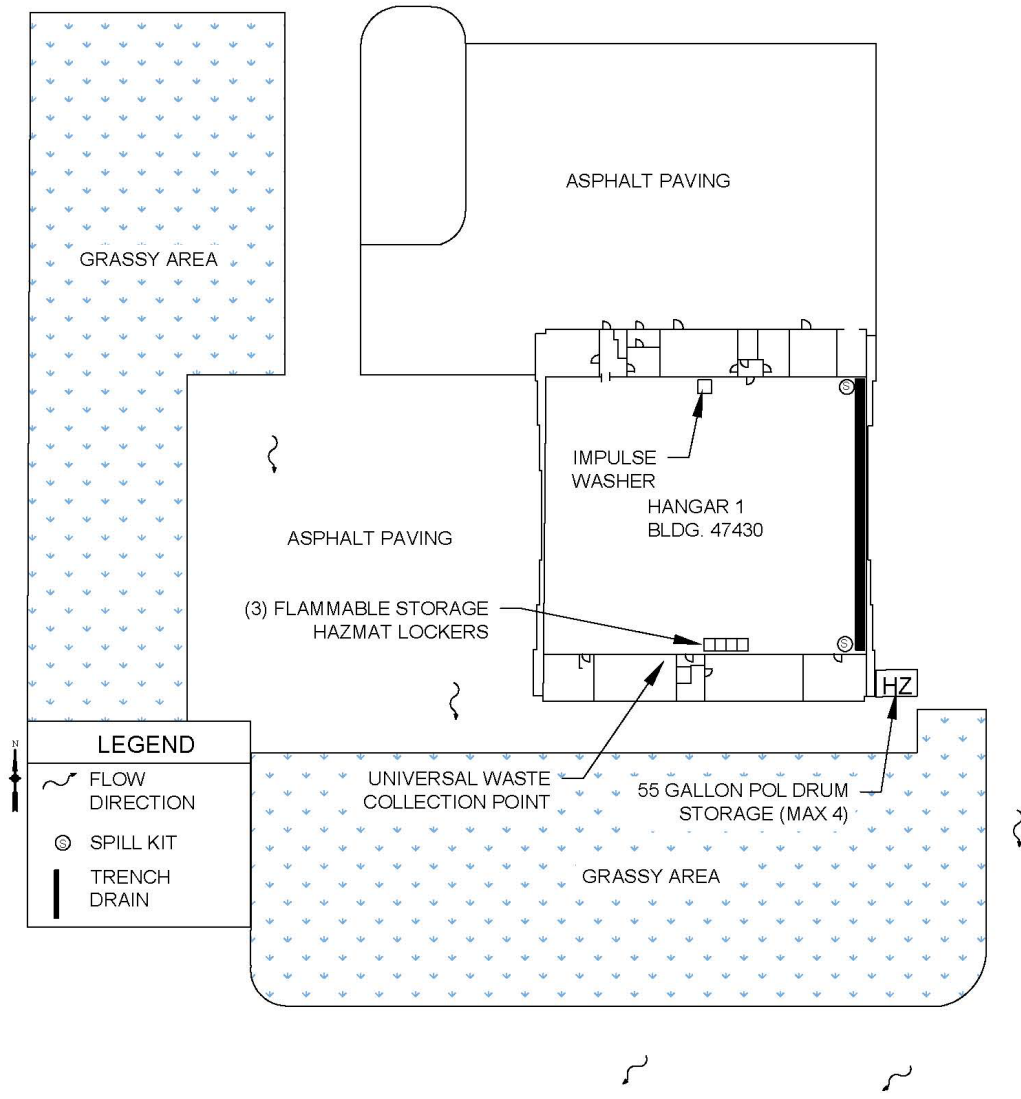
4.3 Facility Diagrams

The following figures detail the locations of bulk fuel storage equipment and associated infrastructure at the time of the June 30, 2023 site visit.

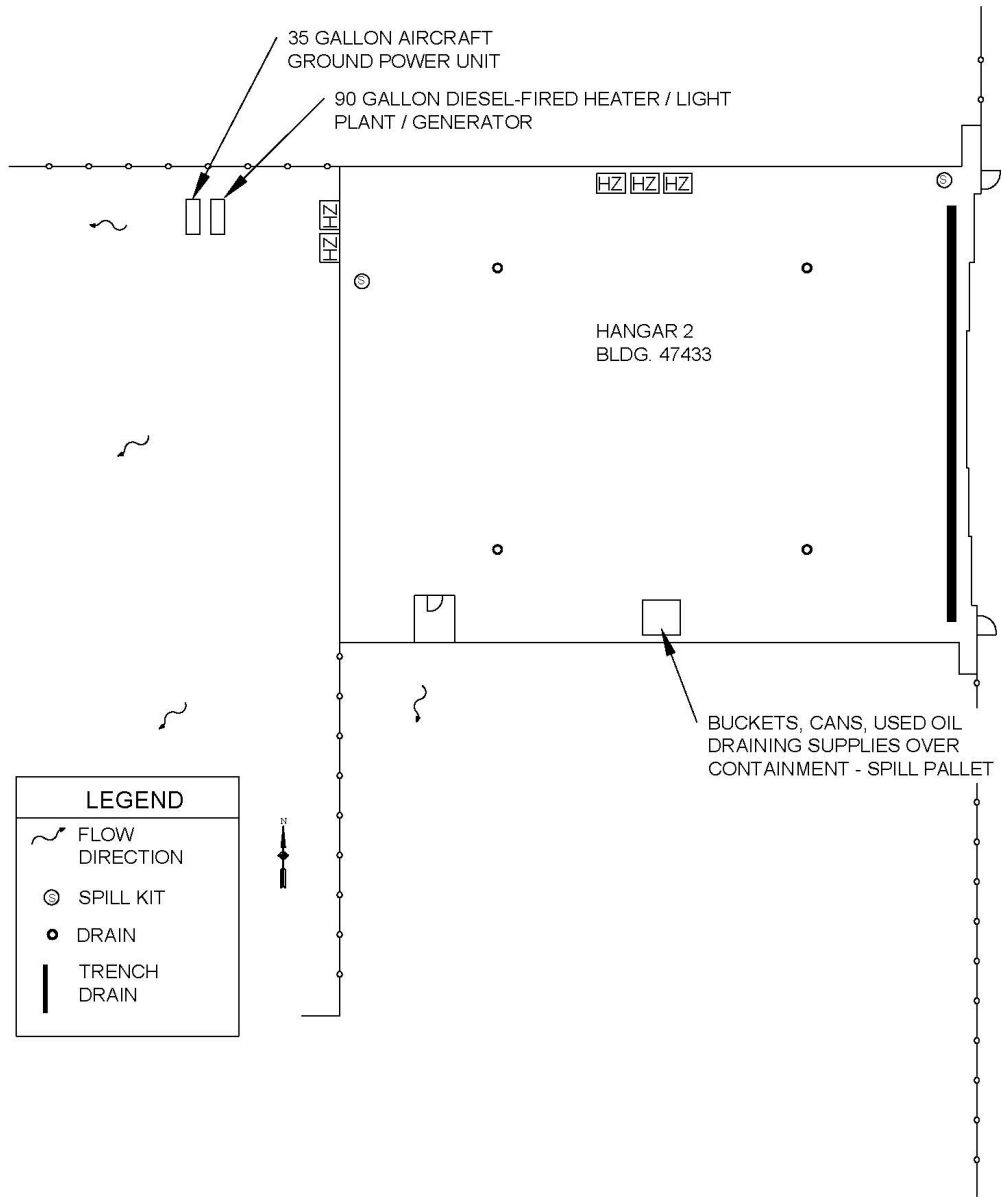
4.3.1 Ground Support Building Diagram



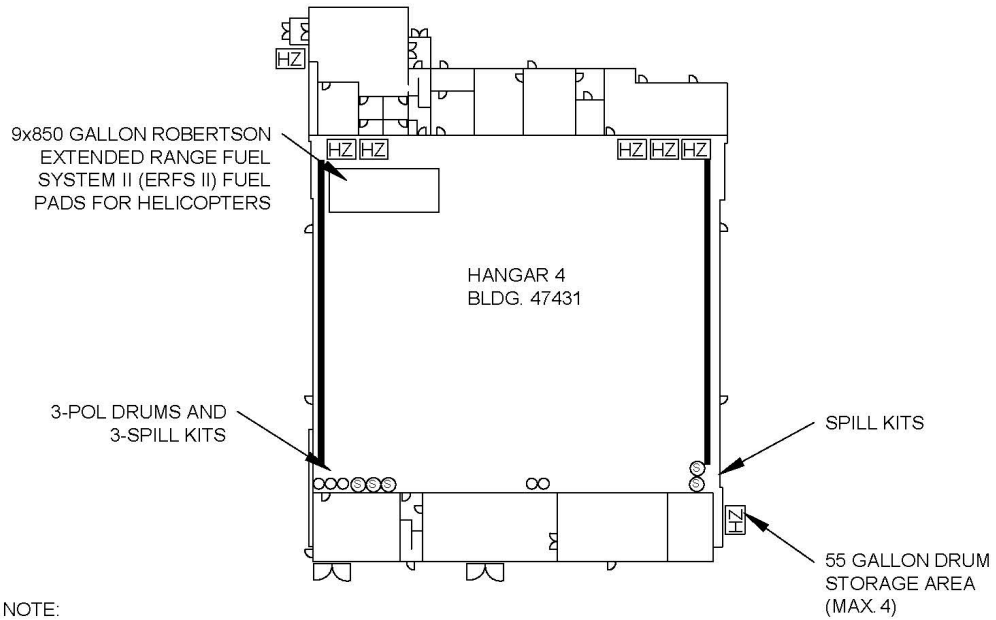
4.3.2 Hanger 1 Diagram



4.3.3 Hanger 2 Diagram



4.3.4 Hanger 4 Diagram

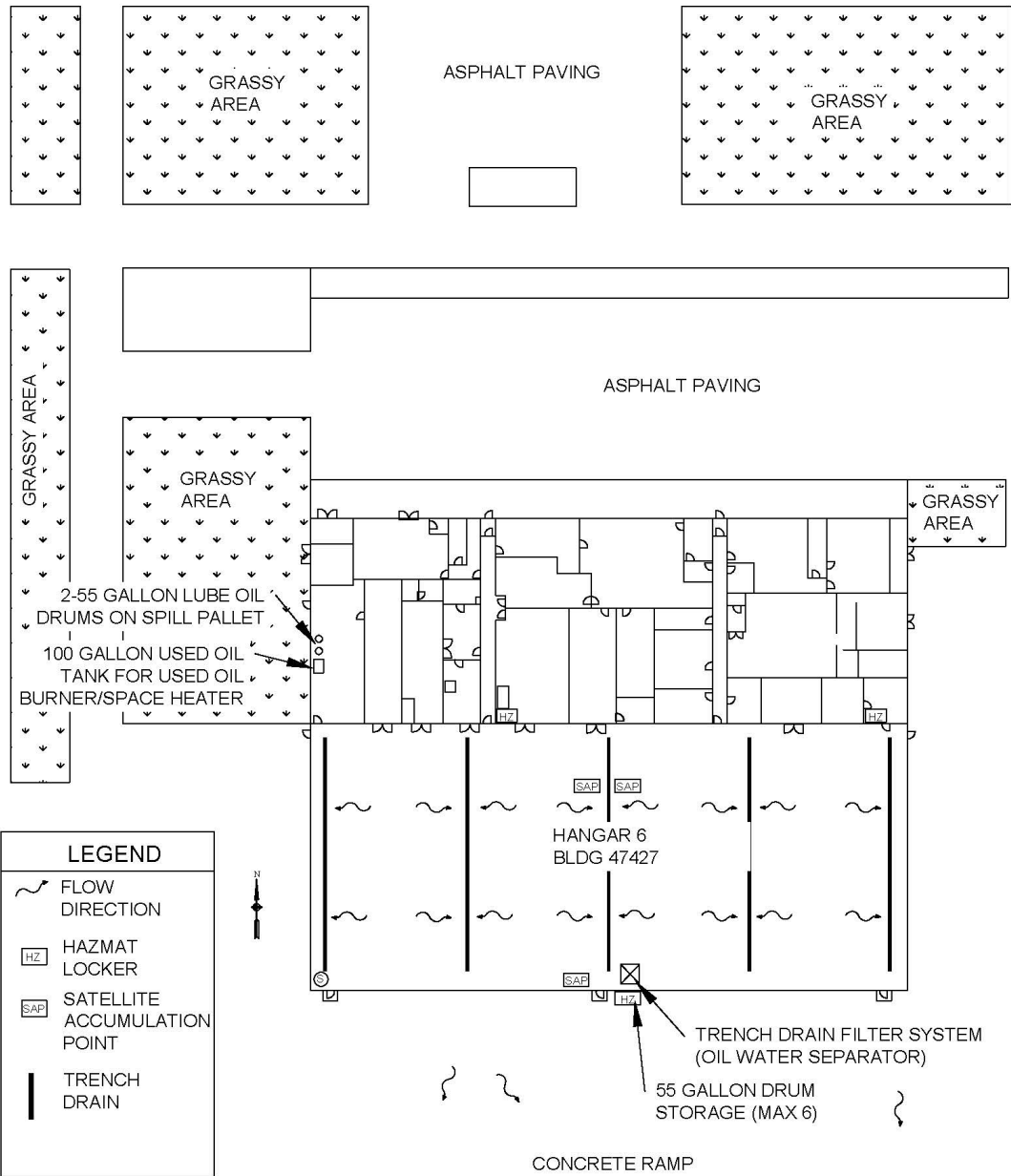


NOTE:
 DRUMS OF VARIOUS POLS ARE USED DURING
 MAINTENANCE OPERATIONS (MAX. 4). EMPTY DRUMS
 ARE STORED TO SWAP WITH FULL DRUMS.

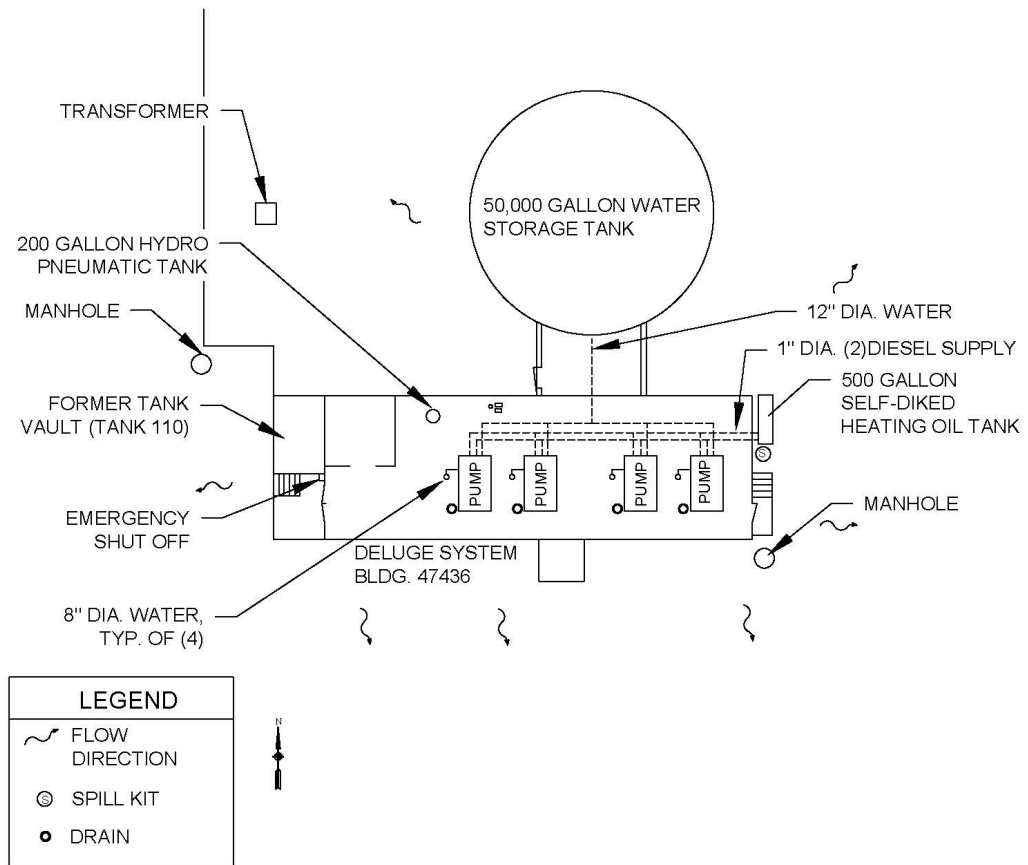
LEGEND	
	FLOW DIRECTION
	HAZMAT LOCKER
	SPILL KIT
	TRENCH DRAIN



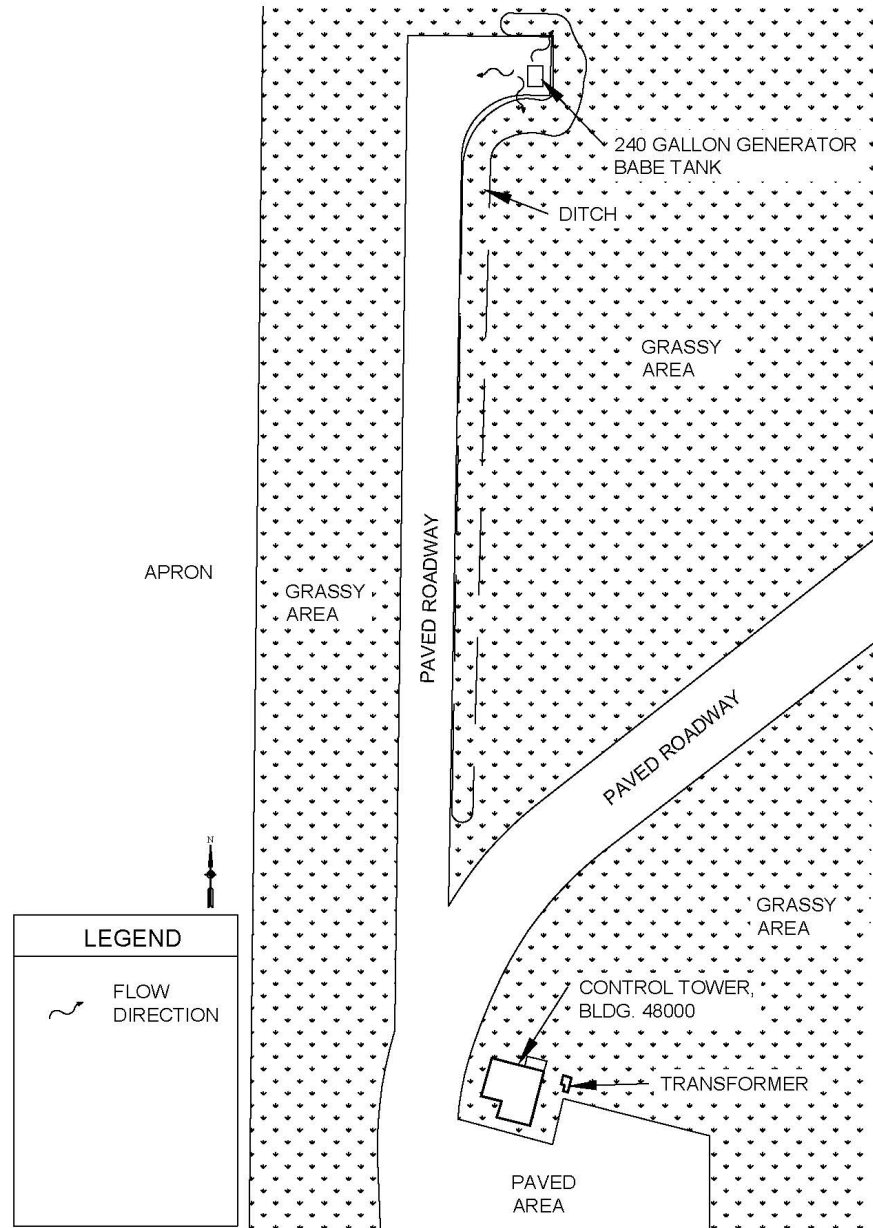
4.3.5 Hanger 6 Diagram



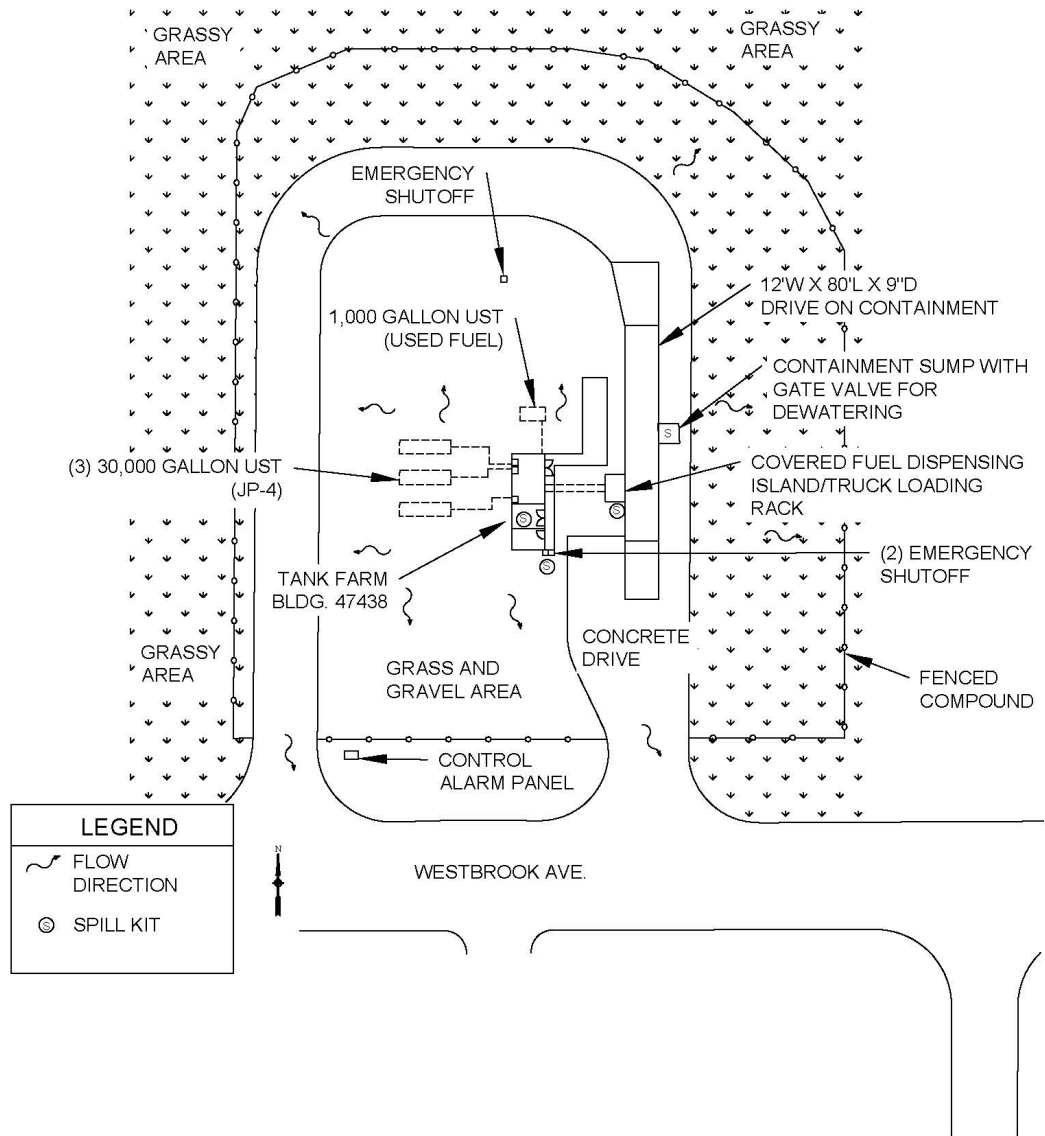
4.3.6 Deluge System Diagram



4.3.7 Control Tower Diagram



4.3.8 Tank Farm Diagram



5 REGULATORY CROSS-REFERENCE

This Plan is prepared to meet applicable federal, state, and local laws pertaining to oil spill prevention and response. The governing regulatory authority is Section 311 of the Clean Water Act (CWA). The requirements for oil spill prevention and response are specified in the following parts of the CFR, Chapter 40:

- 40 CFR §110 – Discharge of Oil;
- 40 CFR §112 – Oil Pollution Prevention; and
- 40 CFR §300.33 – Comprehensive Environmental Response, Compensation, and Liability Act.

The SPCC plan is written to “form a comprehensive Federal/State spill prevention program that minimizes the potential for discharges” (40 CFR 112.1(e)). Accordingly, this Plan incorporates state requirements specified in Alaska Administrative Code (AAC) 18 AAC 75, Oil and Other Hazardous Substances Pollution Control, as applicable. Army Regulation 200-1, Section 11-4b Storage Tank Systems/Oil and Hazardous Substances Spills also applies to this SPCC plan. The collective set of federal and state regulations are referenced in this Plan as the “SPCC regulations.”

The DEC requires registration of onshore facilities containing oil storage tanks equal to or greater than 1,000 gallons in capacity as Class 2 facilities. All regulated aboveground storage systems operated by the Alaska Army National Guard (AKARNG) at the Bryant AASF have been registered with the DEC in accordance with the requirements of 18 AAC 75.840.

5.1 SPCC Rule Cross-Reference

Because the sequence of sections in this Plan does not follow the sequence specified in 40 CFR §112.7, a cross reference to the current SPCC requirements is required. We have attached a “Revised SPCC Rule Cross-Reference” form in Appendix B.

5.2 Plan Implementation Schedule

This Plan will be effective the date of management approval.

6 HOW TO INSPECT AND TEST TANK SYSTEMS

The SPCC regulations state that ASTs will be subject to integrity testing on a periodic basis, and whenever material repairs or system modifications are implemented. Only documented SPCC trained contractors or employees may conduct inspections.

6.1 Above Ground Storage Tanks

The AKARNG is fulfilling federal and state inspection and integrity testing requirements for shop fabricated AST systems that have a capacity of 75,000 gallons or less by following the Steel Tank Institute (STI) Standard SP001, *Standard for the Inspection of Aboveground Storage Tanks* (January 2018 edition).

This standard incorporates a risk-based approach to AST inspection and integrity testing based upon the tank capacity, design, and configuration. Tanks equipped with spill control devices and passive features that allow for detection of releases prior to impacting the environment require no, or less frequent, leak testing and inspection by a STI SP001 Certified Tank Inspector.

All ASTs in operation at this facility have been evaluated to determine if they have release protection barriers (RPBs) or a continuous-release detection method (CRDM), and spill control as defined by the STI SP001 Standard, to determine their STI SP001 tank inspection category according to Exhibit 6-1 below. Category 1 tanks have the lowest risk of a significant release and Category 3 tanks have the highest spill risk.

Exhibit 6-1: AST Inspection Category Quick Reference

Tank Configuration	Tank has CRDM?	Tank has Spill Control?	Tank Inspection Category
Single-wall AST in contact with ground	False	False	3
	False	True	2
Elevated tank	True	True	1
AST with RPB	True	True	1
AST with double bottom	True	True	1
Double-wall AST with overfill prevention	True	True	1
Double-wall AST without overfill prevention	True	False	3
Vertical tank resting on concrete (conforms with definition of RPB)	True	True	1
	True	False	3

NOTE: All fixed ASTs operated at the Bryant AASF are Category 1 storage units.

The inspection category is then used to determine the type and frequency of required inspections and integrity testing in accordance with the STI SP001 - Shop-Fabricated Tank Inspection Criteria table, an excerpt of which is shown on the following page.

Based upon the STI SP001 Standard and the capacity of the ASTs at the facility, periodic inspection of the ASTs by Bryant AASF personnel is adequate to monitor tank integrity unless personnel observe damage or other conditions, such as leaks or corrosion, that require assessment by a STI SP001 Certified Tank Inspector.

Exhibit 6-2: STI SP001 Shop-Fabricated Tank Inspection Criteria

AST Type and Size (U.S. Gallons)	Tank Inspection Category 1	Tank Inspection Category 2	Tank Inspection Category 3
Shop-Fabricated ASTs	0 – 1,100	P	P
	1,101 – 5,000	P	P, E&L(10)
Portable Containers	P	P, E&L(10)	P, E&L(5), I(10) or P, L(2), E(5)
	P	P	P ¹

- 1 Owner shall either discontinue use of portable container for storage or have the portable container tested and recertified by the Department of Transportation (DOT) per the schedule listed in the standard. For steel drums, the interval is every 12 years.
- 2 P = Periodic and annual inspections.
- 3 E = Formal external inspection conducted by a STI Certified Tank Inspector.
- 4 I = Formal internal inspection conducted by a STI Certified Tank Inspector.
- 5 L = Leak test by a STI Certified Tank Inspector.
- 6 (#) = Indicates maximum inspection interval in years. For example E(5) indicates a formal external inspection every five years.

The personnel performing the periodic inspections of Bryant AASF tanks are knowledgeable of storage facility operations, characteristics of the liquid stored, the type of AST, and its associated components. The intent of inspections and procedures is covered in the training provided to the Facility Designee. The routine inspections focus specifically on detecting any change in conditions or signs of product leakage from the tank or portable container, piping system, and appurtenances. Inspections will be documented on the AST Visual Inspection Checklist (or similar checklists) contained in Appendix D of this plan. This checklist is based upon similar checklists included in the STI SP001 Standard. Completed inspection checklists will be retained for a minimum of 3 years.

If signs of leakage or deterioration from the tank are observed that call into question the integrity of the tank system by facility personnel, the tank is to be inspected by a STI SP001 Certified Tank Inspector to assess its suitability for continued service. Records of any inspections made by a STI SP001 Certified Tank Inspector must be retained for the life of the tank.

NOTE: Records/documentation of all formal external and internal inspections and/or non-destructive integrity testing data for all AST(s) must be maintained for the life of the AST(s) to enable comparative analysis of the results of successive tests and inspections.

If a problem is noted on the inspection report, it is the responsibility of the inspector to identify the problem to the WRPM, who will assist in resolving the problem quickly.

Corrective action for a leak that is not contained by secondary containment and has the potential to enter surface water or groundwater must be taken immediately. Consult Section 1.6 of this plan for detailed instructions for external reporting. Corrective action for an observed leak contained by secondary containment must be initiated within 24 hours.

Inspections of secondary containment areas and captured storm water are required by 40 CFR §112.7 and described in Section 7.1 of this plan. Inspections must occur periodically and after every precipitation event.

6.2 Portable Containers

Portable containers (including drums, totes, fuel pods, blivits, and skids) should be visually inspected monthly for signs of deterioration, discharges, or accumulation of oil. These inspections will be documented using the AST Visual Inspection Checklist provided in Appendix D of this plan.

External fuel pods for aircraft are stored empty in the hangar. The external fuel pods are maintained empty, unless mounted on the aircraft. Inspections and preventative maintenance actions are conducted on the external fuel pods in accordance with the Technical Manual for the unit. No additional inspections are mandated in this plan.

6.3 Mobile Refuelers

Mobile refuelers or MFTs are routinely inspected and have scheduled preventative maintenance performed in accordance with technical manuals developed by the manufacturer and Department of Defense. Documented inspections of MFTs will be performed monthly using the portable container section of the AST Visual Inspection Checklist in Appendix D of this plan.

6.4 Oil Filled Operational Equipment

Transformers at the Bryant AASF are owned, operated, and inspected by local utility. Inspections and maintenance of transformers is the responsibility of the local utility. The AST Visual Inspection Checklist contained in Appendix D of this plan does not apply to the inspection of transformers. If a release from a transformer is observed or suspected, it will be reported to the base utility operator, Doyon Utilities.

6.5 How to Conduct Periodic Inspections

Periodic inspections conducted by the AKARNG focus on the early detection of system failures and are intended to detect and prevent system malfunctions, equipment deterioration, and operator errors.

An AST Visual Inspection Checklist is provided in Appendix D that can be used to document inspections of fixed ASTs on Page 1 and portable containers, such as 55-gallon drums, TPUs, and MFTs on page 2 of the checklist.


NOTE: Equivalent inspection checklists may be used to document inspections provided they address the same information. All completed inspection checklists and attachments will be kept at the FMO Environmental Office on JBER and retained for at least three years after the inspection was conducted.





The Facility Designee is responsible for conducting, documenting, and sending periodic inspections to the WRPM. Deficiencies noted during inspections must be brought to the attention of the WRPM so that corrective actions can be coordinated before a more serious problem develops.




Exhibit 6-3 provides guidance that personnel responsible for conducting periodic inspections should review before performing the inspection. If you have any questions, contact the WRPM.




NOTE: Pictures provided in Exhibit 6-1 are intended to help the inspectors know what to look for when conducting an inspection. Photos used in this guide are for informational purposes only and do not depict systems that are located at the subject facility.

Exhibit 6-3: Periodic Inspection Guide

System Component	What to look for	Examples of what you may observe
Containment and Leak Detection		
Secondary Containment	<p>Check exposed portion of containment dike for damage (dents, cracked welds, etc.). Tank bottom should not be in contact with concrete or windblown debris.</p> <p>Look for physical evidence that the tank is leaking. Wet spots along weld seams or beneath the tank may indicate that the integrity of the containment dike has degraded.</p>	

System Component	What to look for	Examples of what you may observe
Containment and Leak Detection		
Containment Valves and Drainage Ports	<p>Drain ports for integral containment structures must be sealed with leak-proof plugs or, if equipped with a valve, the valve must be maintained in the closed position. Water should not accumulate in the integral dike. If fluids are found, action must be taken to determine the cause.</p>	
Primary Tank	<p>Look for physical evidence that the tank is leaking. Wet spots along weld seams or beneath the tank may indicate that the integrity of the tank has degraded.</p> <p>Use a water detection paste to determine if water is accumulating inside the primary tank. The presence of water in the tank will not only degrade fuels but may introduce microbial-induced corrosion that can quickly degrade the integrity of the tank.</p>	
Surrounding Soil or Ground Surface	<p>Inspect surface areas beneath and around fuel dispensers, piping, and fill-ports. If impacted soil is found, try to determine the source so that appropriate repairs can be made in a timely manner.</p>	
Interstitial Space	<p>The interstice is the space between the inner and outer walls of a double-walled tank system or the space between the tank and dike wall of a self-diked tank.</p> <p>Visually inspect the interstice using a dipstick and/or flashlight to determine if water or other liquids have accumulated within this space. If liquids are found in the interstice, it is a clear indication that the integrity of the primary tank has been compromised.</p>	

System Component	What to look for	Examples of what you may observe
Tank Equipment		
Valves	<p>Valves and fittings associated with ASTs and piping are a common source of leaks. Oily dust and surface staining on or beneath valves are a clear indication that there is a leak and that repairs are necessary.</p> <p>Drainage valves should be locked or otherwise secured to prevent unauthorized personnel from discharging product from the tank.</p>	
Spill Bucket	<p>Inspect for debris, residue, and water in the spill-containment bucket. Debris will absorb fuel and pose a potential fire hazard. If found, ensure that clean-up actions are completed.</p> <p>Ensure that cover on the spill-containment box is kept closed and locked.</p> <p>Drain valves on the spill-containment box must be operable and maintained in a closed position.</p>	
Liquid-Level Equipment	<p>Inspect the liquid-level gauge to ensure that it hasn't been damaged and that it is working properly.</p> <p>Verify that the liquid-level gauge is readable. If it isn't, the gauge should be replaced or repaired.</p> <p>Perform a calibration check annually.</p>	

System Component	What to look for	Examples of what you may observe
Tank Equipment continued		
Overfill Equipment	<p>Look for staining or other evidence that the tank may have been overfilled.</p> <p>If equipped with a “test” button, activate the audible horn or light to confirm operation. Replace old batteries if battery-powered.</p> <p>If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.</p>	
Piping Connections	<p>Check piping for leaks, corrosion, and damage.</p> <p>Ensure that elevated piping is properly supported so that the pipe doesn’t sag.</p> <p>Ensure that piping is properly protected against vehicle and foot traffic.</p>	
Tank Attachments and Pathways		
Ladder and Platform Structure	<p>Ensure that ladders and walk ways are in good physical condition and that they are secured in a manner that will prevent them from moving when used.</p> <p>Additionally, ensure that facility personnel aren’t using boxes and other equipment as a ladder.</p>	

System Component	What to look for	Examples of what you may observe
Tank Attachments and Pathways continued		

Pathways and Surrounding Area Clear

Areas surrounding the tank system must be kept free of equipment and other clutter that restricts access and inhibits the ability to identify and respond to leaks and other spills or poses a fire hazard.



Other Considerations

Other conditions that should be addressed for continued safe operation or that may affect the site-specific prevention plan

Ensure that the tank is grounded, overhead lighting is working properly, and spill kits are adequately stocked.



Portable Containers

Containers within Designated Areas?

Mobile refuelers that are filled with fuel should be parked in the containment areas designed for mobile refuelers.

Additionally, 55-gallon drums, TPUs, and other portable containers should be in designated areas equipped with secondary containment identified on the diagram provided in Section 4.2 of this plan.



System Component	What to look for	Examples of what you may observe
Portable Containers continued		
Debris, spills, or other fire hazards in containment or storage area?	<p>Areas surrounding portable container storage areas must be kept free of equipment and other clutter that restricts access and inhibits the ability to identify and respond to leaks and other spills.</p> <p>Oily residue, fuel, cardboard boxes, paper, and other debris that is allowed to accumulate within a designated storage area increases the potential for a fire hazard. Clean up the area if and when these conditions are identified.</p>	
Visible signs of leakage around the container or storage area?	<p>Inspect surface areas beneath drums, mobile refuelers, and other portable oil storage systems to identify any evidence of spills or leaks. If found, try to determine the source so that appropriate repairs can be made in a timely manner.</p>	
Noticeable container distortions, buckling, denting, or bulging?	<p>Drums and other portable containers that are damaged or are in poor condition are much more likely to leak. Look for missing bungs, bulging heads, abrasions, dents, gouges, and other damage. If drums are damaged, the contents of the drum should be transferred to one that is in better condition.</p>	

7 HOW TO DISCHARGE PRECIPITATION FROM SECONDARY CONTAINMENT AREAS

Rainwater and snow may accumulate in outdoor secondary containment systems such as the Tank Farm truck rack containment area. All personnel will use the following Standard Operating Procedures (SOPs) to:

- inspect drain valves periodically (if applicable) to ensure that they are closed and free of debris;
- check secondary containment after any rain event or snowstorm to assess whether drainage is necessary; and
- document the discharge of storm water and removal of snow from the secondary containment area in accordance with 40 CFR 112.8(c)(3) using the *Containment Drainage Log* provided in Appendix D (or equivalent).

NOTE:

- All open-top secondary containment systems associated with in-service ASTs are located indoors. Hence, it is unlikely that these procedures will need to be implemented at the AASF for ASTs.
- The truck rack containment area at the Tank Farm is open to precipitation. The facility normally allows accumulated precipitation to evaporate. This is acceptable provided that the depth of accumulated water is less than 3.5 inches. If stormwater accumulates to more than 3.5 inches in depth, the containment area must be drained utilizing the procedures in this section to ensure there is sufficient containment capacity during fuel transfers to handle the full capacity of an MFT.

7.1 Periodic Inspection

Periodically check the containment areas to ensure that they are in good condition and free of residual oils and other debris (sand, dirt, trash, etc.):

- Sweep up debris. If the containment area is equipped with a grate, it will be necessary to remove the grate to remove the debris;
- If surface areas within the containment area are covered with fuel or other oils, use absorbents to clean impacted surfaces; and
- Double-bag POL contaminated debris and absorbents and dispose of in accordance with the HWMP.

NOTE: Ensure that enough absorbent is used that no free liquids are able to drip from the bags.

7.2 Precipitation Events

Following any rain event or snow storm the following steps will be taken:

- Check secondary containment for a visible sheen on the surface of the water indicating residual spilled fuel product;

- If there is a visible sheen, remove grating if present and place absorbent pads on the water surface to remove spilled product;
- Clean spilled product in and around the containment system;
- Dispose of oily absorbents in accordance with the AKARNG HWMP;
- Utilize pumps or siphon hoses to remove accumulated water if the containment area is not equipped with a drainage valve;
- Once water has been released, close the drain valve or remove the pumps/siphon hoses;
- Complete the *Containment Drainage Log* (or similar inspection log) found in Appendix D of this plan. Make sure to document the time that the drain valve was closed.

NOTE:

- If dealing with snow that is noticeably contaminated with fuel or other oily products, remove the contaminated snow with a shovel and place the contaminated snow into an open-head 55-gallon drum. Snow that is not visibly contaminated may be placed outside the containment area where it will eventually melt.
- Only personnel who have received training to determine the water or snow quality, can discharge water or remove snow from containment areas, and then only upon the direction of the Facility Designee.

If there are any questions about the quality of the water or snow present, the Facility Designee, at his/her option, will either:

- contact the WRPM to arrange for off-site transport for proper treatment and disposal; or
- allow the water to evaporate and, if appropriate, take corrective action to clean up the residual contamination.

Maintain a record that reflects the following information:

- the name of the person who determined the water or snow;
- when the release or removal was terminated; and
- approximate volume of water that was discharged or snow that was removed.

8 HOW TO TRAIN SPILL RESPONSE PERSONNEL

A copy of this SPCC Plan will be maintained at the subject facility. The WRPM will schedule and conduct annual discharge prevention briefings for all POL-handling and spill response individuals to review the Plan's contents and implementation at the subject facility. Key topics related to the SPCC Program include:

- regulatory requirements specifying that oil handling personnel receive training;
- operation and maintenance of equipment to prevent discharges;
- types of spills (incidental small, incidental medium, and major);
- potential spill sources typical of the facility;
- importance of safety;
- types of problems that can lead to a spill;
- key elements of the SPCC Plan;
- actions that should be taken in the event of a spill;
- contents of a spill kit and other resources that can be used to control a spill;
- basic techniques for restricting a spill using spill kits and other resources;
- spill notification requirements and procedures;
- spill clean-up responsibilities; and
- proper disposal of contaminated absorbents and debris.

NOTE: Document all training using a copy of the blank Training Log (or similar log) provided in Appendix D. Copies of completed training logs are kept at the construction facility management office and may be maintained in shop training file.

9 HOW TO UPDATE AND AMEND YOUR SPCC PLAN

The Plan will be reviewed by the WRPM or their designee on a periodic basis, and by federal and/or state agencies following reportable spill events. Following each owner/operator or agency Plan review, the Plan may be amended as appropriate. If revisions are required, the revision process shall adhere to the procedure detailed in this section. There are two types of revision: administrative updates and technical amendments.

9.1 Administrative Updates

Administrative updates are non-structural and non-process-related changes to the plan. Administrative updates to the plan do not require a PE signature but must be made immediately upon knowledge of the change.

Examples of administrative updates include:

- changes in the assignment or phone numbers of the Facility designees;
- changes in phone numbers of local emergency response agencies; and

- other pertinent Department of Defense or AKARNG policy changes.

To record administrative changes to this plan, use the form located in Appendix D of this plan.

9.2 Technical Amendments by a Certified PE

The SPCC Plan must be amended per 40 CFR §112.5(a-c) when there is a change in facility design, construction, operation, or maintenance that materially affects the facility's potential for the discharge of oil as described in 40 CFR §112.1(b)¹. All technical amendments to the plan must be implemented as soon as possible, but no later than six months after the change occurs and is certified by a PE.

Examples of the types of changes requiring a technical amendment to the plan include the following:

- commissioning or decommissioning containers;
- replacement, reconstruction, or movement of containers;
- reconstruction, replacement, or installation of piping systems;
- construction or demolition that might alter secondary containment structures;
- changes of product or service;
- revision of standard operation or maintenance procedures;
- addition of new HAZMAT or POL storage buildings;
- fueling activity changes (addition of onsite fueling or cessation of onsite fueling);
- installation of new storage tanks;
- significant changes to federal regulations or State of Alaska regulations affecting the applicability and effectiveness of this SPCC Plan or those regarding reportable spill quantities;
- when the SPCC Plan fails or proves to be ineffective in preventing or responding to a spill;
- the EPA Regional Administrator determines that the Plan does not meet the requirements of 40 CFR §112, or that the Plan is not sufficient to prevent and contain potential oil discharges from the facility; and

¹ 40 CFR §112.1(b) – “discharge oil in quantities that may be harmful...into or upon the navigable waters of the U.S. or adjoining shorelines, or into or upon the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the U.S.”

- after pertinent national, regional, or state contingency plans are modified; or after any changes in adjacent land or water use that would affect spill prevention and response.

The SPCC Plan must also be reviewed by the DMVA at least once every five years to evaluate whether more effective and field-proven prevention and control technology can be implemented to significantly reduce the likelihood of a discharge at the facility. The DMVA reviewer must document completion of the review by signing a statement as to whether the SPCC Plan will be amended. If no technical amendments are required, it is not necessary to have the plan recertified by a PE. The Record of Plan Review forms in Appendix D will be used to document the 5-year plan review.

10 HOW TO MANAGE MOBILE REFUELERS AND PORTABLE STORAGE UNITS

Mobile refuelers and other portable storage units represent a unique challenge within the National Guard. According to Army National Guard (ARNG) Bureau Policy, dated 24 October 2007, they are not intended to be used as ASTs. In the event that it is necessary to temporarily store fuel or other oil products in a mobile refueler or other type of portable storage unit (i.e., TPUs, fuel pods, blivits, skids, and drums), the first priority is to ensure that it is placed in an area that provides secondary containment.

In the event that secondary containment is not available for a mobile refueler at a facility, the driver of the vehicle will be expected to review the Army National Guard Oil Spill Prevention and Contingency Plan or equivalent, which by ARNG Bureau Policy, will be maintained within the cab of each refueler. This plan provides detailed instructions for the following:

- Spill Response;
- Transporting Fuel;
- Refueling Operations; and
- Parking the MFT

Where providing containment is impractical, the Oil Spill Prevention and Contingency Plan will serve as a strong contingency plan that will be implemented by the operator of the vehicle in the event of a spill.

NOTE: Refer to the BMP Fact Sheets contained Appendix E of this plan for guidance relevant to the proper management of MFTs.

Portable oil-storage containers that are 55 gallons or larger, such as TPUs, fuel pods, blivits, skids, and drums that contain fuels and other POLs, must be provided secondary containment when removed from their vehicle and placed on the ground and maintained in an area that provides localized secondary containment. If the portable oil storage container is verified to be empty, it is not necessary to provide secondary containment.

NOTE: As a standard practice, external fuel pods are completely defueled before they are removed from the aircraft. Additionally, as a BMP, fill-ports on empty TPUs that may be temporarily stored at the facility will be locked to prevent personnel from pouring liquids into the units without proper authorization.

Appendix A: Definitions

Appendix A

Definitions

CONTENTS

- Regulatory Definitions Terminology

REGULATORY DEFINITIONS AND TERMINOLOGY

Continuous Release Detection Method (CRDM): Per the STI SP001 Standard, it is a means of detecting a release of liquid through inherent design. CRDMs are passive, not requiring sensors or power to operate. Liquid releases are visually detected by facility operators.

Facility Designee: All references to the Facility Designee refer to the person designated as the primary point of contact at the facility responsible for environmental actions and for the implementation of this plan in the event of an emergency. The Facility Designee may coordinate and direct control and clean up incidental spills involving oil on or adjacent to any AKARNG facility.

In the event of a major spill, the Facility Designee will transfer responsibility for the emergency to the Senior Fire Official or other capable emergency response professional when they arrive at the facility.

Harmful Quantity:

- Quantities that violate applicable state water quality standards;
- cause a film, sheen, or discoloration of the water surface or adjoining shoreline or cause a sludge or emulsion to be deposited beneath the water surface or adjoining shorelines; or
- produce a discharge of more than 1,000 U.S. gallons of oil in a single event.

Hazardous Material (HAZMAT): a material that, due to its chemical, physical, or biological nature, causes safety, public health, or environmental concerns as defined by 49 CFR §173.2 and 29 CFR §1910.1200, and Hazardous Waste as defined by 40 CFR §261. See 40 CFR §302.4 for a list of HAZMAT.

Interstice: Space between the inner and outer walls of a double-walled storage tank. The interstice provides secondary containment in the event that the inner tank wall leaks.

Loading/Unloading Racks: Areas intended for routine bulk transfers of POL with engineered loading equipment typically used in association with refineries. The EPA does not interpret §112.7(h) to apply beyond activities and/or equipment associated with tank car and tank truck loading/unloading racks. The EPA interprets §112.7(h) only to apply to loading and unloading “racks.” Under this interpretation, if a facility does not have a loading or unloading “rack,” for POL transfer §112.7(h) does not apply.

Oil: oil of any kind or in any form including petroleum, MoGas, diesel, JP-8, F-24, #2 fuel oil, sludge, oil refuse, grease, kitchen grease, and oil mixed with wastes other than dredged soil. For a more complete definition refer to 40 CFR §112.2.

Release Prevention Barrier (RPB): Per the STI SP001 Standard, it is a liquid containment barrier installed underneath an AST to divert releases to the edge of the AST where they can be easily detected and also to prevent releases from impacting the environment. RPB materials must be compatible with the stored product; examples are steel, concrete or geomembrane liners.

Reportable Quantity: the quantity of environmental pollutant above which a report must be given to environmental authorities, such as the EPA or state or local regulators. See 40 CFR §302 for a list of Reportable Quantities.

Waters of the United States - Defined in 40 CFR 230.3(s) as:

1. all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. all interstate waters including interstate wetlands;
3. all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
 - i. which are or could be used by interstate or foreign travelers for recreational or other purposes; or
 - ii. from which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
 - iii. which are used or could be used for industrial purposes by industries in interstate commerce;
4. all impoundments of waters otherwise defined as waters of the United States under this definition;
5. tributaries of waters identified in paragraphs (1) through (4) of this section;
6. the territorial sea;

7. wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (1) through (6) of this section; waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of Clean Water Act (CWA) (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States. Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with EPA.

Appendix B: SPCC Rule Cross-Reference

Appendix B

SPCC Rule Cross-Reference

CONTENTS

- SPCC Rule Cross-Reference Table

APPENDIX B: SPCC RULE CROSS-REFERENCE

SPCC RULE CROSS-REFERENCE TABLE

The following table was prepared to assist you in the preparation of the cross-referencing of the requirements listed in the SPCC Rule and the equivalent requirements in your SPCC Plan if it does not follow the standard sequence of sections. It lists each requirement in the SPCC Rule, provides a description of the requirement, and references the associated provision in your Plan.

40 CFR §112	Description of Rule	Plan Section
§112.3(d)	PE Certification	Section 2.2
§112.3(e)	Location of SPCC Plan	Section 1.1
§112.4	Amendment by Regional Administration	Section 9.0
§112.5	Plan Review and Amendment	Section 9.0, Appendix D
§112.6	Qualified Facilities Plan Preparation	Section 2.0
§112.7	General requirements for SPCC Plans for all facilities and all oil types	
§112.7(a)(1)	Facility conformance with rule requirements	Section 1.0
§112.7(a)(2)	Deviations from plan requirements	Sections 1.0 and 3.4
§112.7(a)(3)	Physical layout and site diagram	Section 4.0
§112.7(a)(3)(i)	Oil type in each fixed container & its storage capacity	Section 3.2
§112.7(a)(3)(ii)	Discharge prevention measures including procedures for routine handling (loading/unloading and facility transfers)	Section 3.1, Appendix E
§112.7(a)(3)(iii)	Discharge or drainage controls	Section 7.0
§112.7(a)(3)(iv)	Countermeasures for discharge discovery, response, and cleanup (facility's capability and those required by a contractor)	Sections 3.5 and 3.7
§112.7(a)(3)(v)	Methods of disposal of recovered materials	Section 3.8
§112.7(a)(3)(vi)	Contact list and phone numbers	Page ii, Section 1.6
§112.7(a)(4)	Spill reporting procedures (information on exact address, phone number of facility, and other spill-related details)	Section 1.6, Appendix C
§112.7(a)(5)	Procedures to be used when a discharge occurs in a way that make them readily usable in an emergency	Sections 1.4 and 1.5
§112.7(b)	Potential discharge volumes and flow direction	Section 3.3
§112.7(c)	Secondary containment and/or diversionary structures	Sections 3.1 and 3.2
§112.7(d)	Statement of impracticability for secondary containment	N/A
§112.7(e)	Inspections, tests, and records	Section 6.0, Appendix D
§112.7(f)(1), (f)(3)	Personnel training & spill prevention briefings	Section 8.0
§112.7(f)(2)	Designated person accountable for discharge prevention	Section 1.3
§112.7(g)	Security	Section 3.4
§112.7(h)	Loading/unloading and tank truck rack	Section 3.1, Appendix E

APPENDIX B: SPCC RULE CROSS-REFERENCE

40 CFR §112	Description of Rule	Plan Section
§112.7(i)	Brittle fracture evaluation requirements	N/A – All ASTs are shop built
§112.7(j)	Conformance with state requirements	Section 5.0, Appendix B
§112.7(k)	Qualified oil-filled operational equipment	Section 6.4
§112.8	Requirements for onshore facilities (excluding production facilities)	
§112.8(a)	Compliance with general and specific requirements	Sections 3.1, 3.2, and 3.5
§112.8(b)(1)	Restraining water from diked storage areas	Sections 3.1 and 7.0
§112.8(b)(2)	Use of valves to control discharge from containment areas	Sections 3.1 and 7.0
§112.8(b)(3-5)	Drainage from un-diked areas with potential for a discharge	Sections 3.3 and 4.4
§112.8(c)(1)	Compatibility of bulk-storage containers with contents	Section 3.2
§112.8(c)(2)	Secondary containment for bulk storage tanks	Sections 3.1 and 3.2
§112.8(c)(3)	Discharge of accumulated water within secondary containment areas	Section 7.0
§112.8(c)(4)	Corrosion protection of underground oil storage tanks	N/A – USTs regulated under Part 280
§112.8(c)(5)	Protection of partially buried, metallic, oil storage tanks	N/A – USTs regulated under Part 280
§112.8(c)(6)	Integrity inspections & testing procedures for ASTs	Section 6.1
§112.8(c)(7)	Leak detection for internal heating oil coils	N/A
§112.8(c)(8)	Devices for overfill prevention & required testing	Section 3.5
§112.8(c)(9)	Effluent treatment system observations	N/A
§112.8(c)(10)	Correcting visible discharges	Section 3.7
§112.8(c)(11)	Positioning of mobile or portable oil-storage containers	Section 6.2, Appendix E
§112.8(d)	Facility transfer operations, pumping, piping	Section 3.1, Appendix E
§112.8(d)(1)	Protection of buried piping	Sections 3.1 and 4.4
§112.8(d)(2)	Piping in standby or not-in-service	Sections 3.1 and 4.4
§112.8(d)(3)	Pipe support design	Sections 3.1 and 4.4
§112.8(d)(4)	Inspections and integrity testing of piping	Sections 3.1 and 4.4
§112.8(d)(5)	Vehicle warnings for aboveground piping	Sections 3.1 and 4.4
§112.9	Requirements for onshore production facilities	
§112.9(a)	General and specific requirements	N/A
§112.9(b)	Oil production facility drainage	N/A
§112.9(c)	Oil production facility bulk storage containers	N/A
§112.9(d)	Facility transfer operations, oil production facility	N/A
§112.10	Requirements for onshore oil drilling and workover facilities	N/A
§112, Appendix C	Substantial Harm Determination	Section 2.3

Appendix C: Spill Reporting Materials

Appendix C

Spill Reporting Materials

CONTENTS

- Spill Release Report Form
- DEC Spill Reporting Placard
- DEC Spill Notification Form
- DEC Incident Final Report Form
- DEC Monthly Oil Spill Reporting Log

SPILL RELEASE REPORT FORM

**ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
SPILL NOTIFICATION FOR OIL AND HAZARDOUS MATERIALS
(Written reports required by 18 AAC 75.307)**

Mailing Address: Alaska Army National Guard
P.O. Box 5169
Bldg. 49000
JBER, AK 99505

Name of Operator of Facility: Department of Military and Veterans' Affairs
Facilities Management Office
Contact Phone Number: Environmental Office (907) 428-7151
Fax: (907) 428-7192

Name of facility: _____ **Phone:** _____

Date and time of notification: _____

Person reporting discharge: _____

Date and time of discharge: _____

Discharge source: _____

Cause of discharge: _____

Type and amount of oil or hazardous substance(s) discharged: _____

Description of cleanup actions taken:

Estimated amount of hazardous substances or oil cleaned up: _____

Estimated amount of hazardous waste generated: _____

Description of any environmental damage caused:

Description of actions taken to prevent recurrence of the discharge:

Method of ultimate disposal or current location of material:

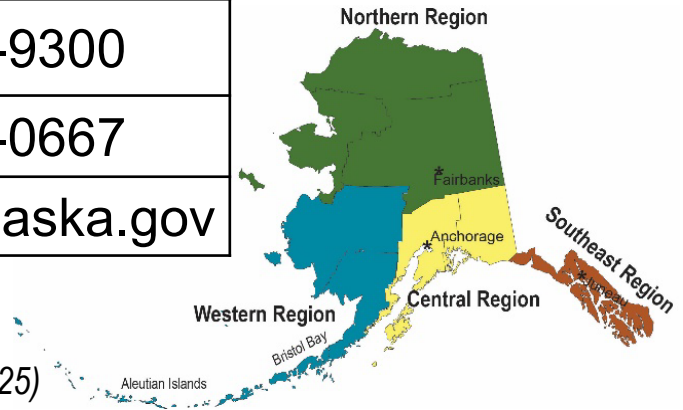
Names of individuals and organizations contacted:

Other information that the Department may require to fully assess the cause and impact of the discharge: _____

APPENDIX C: SPILL REPORTING MATERIALS

Report Oil and Hazardous Substance Spills

TOLL-FREE	1-800-478-9300
INTERNATIONAL	1-907-269-0667
ONLINE	ReportSpills.alaska.gov



It's Required by Alaska Law!
 (AS 46.03.755, AS 46.03.450, 18 AAC 75.300, 18 AAC 75.325)

Oil and Petroleum Product Reporting

Spills to Water

- Any amount spilled to water must be reported **immediately**.

Spills to Land

- Spills in **excess of 55 gallons** must be reported **immediately**.
- Spills in **excess of 10 gallons but less than 55 gallons** must be reported within 48 hours.
- Facilities shall maintain a spill log and report a record of oil discharges from **1 to 10 gallons** monthly.

Spills to Impermeable Secondary Containment

- Spills in **excess of 55 gallons** must be reported within 48 hours.

Hazardous Substance Reporting

Any hazardous substance spill, other than oil, must be reported **immediately**.

Underground Storage Tank (UST)* Reporting

You must report a suspected below ground release from a UST system, in any amount, within 24 hours. (18 AAC 78.212)

If a release is suspected the owner or operator of a UST shall investigate the UST site and shall report to the UST Unit within the period specified. (18 AAC 78.200)



Alaska Department of Environmental Conservation
 Division of Spill Prevention and Response
<https://spills.alaska.gov>

Contact us: (907) 465-5250

* Regulated UST as defined in AS 46.03.450(8)



ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
OIL & HAZARDOUS SUBSTANCES SPILL NOTIFICATION FORM

ADEC USE ONLY

ADEC SPILL #:	ADEC FILE #:	ADEC LC:
---------------	--------------	----------

PERSON REPORTING:		PHONE NUMBER:		REPORTED HOW? (ADEC USE ONLY) <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> PERS <input type="checkbox"/> E-mail	
DATE/TIME OF SPILL:		DATE/TIME DISCOVERED:		DATE/TIME REPORTED TO ADEC:	
INCIDENT LOCATION/ADDRESS:			DATUM: <input type="checkbox"/> NAD27 <input type="checkbox"/> NAD83		PRODUCT SPILLED:
			<input type="checkbox"/> WGS84 <input type="checkbox"/> Other _____		
			LAT.		
			LONG.		
QUANTITY SPILLED: <input type="checkbox"/> gallons <input type="checkbox"/> pounds		QUANTITY CONTAINED: <input type="checkbox"/> gallons <input type="checkbox"/> pounds		QUANTITY RECOVERED: <input type="checkbox"/> gallons <input type="checkbox"/> pounds	
				QUANTITY DISPOSED: <input type="checkbox"/> gallons <input type="checkbox"/> pounds	
POTENTIAL RESPONSIBLE PARTY:			OTHER PRP, IF ANY:		
Name/Business:				VESSEL NAME:	
Mailing Address:				VESSEL NUMBER:	
Contact Name:				> 400 GROSS TON VESSEL:	
Contact Number:				<input type="checkbox"/> Yes <input type="checkbox"/> No	
SOURCE OF SPILL:			CAUSE CLASSIFICATION:		
CAUSE OF SPILL:			<input type="checkbox"/> Under Investigation <input type="checkbox"/> Accident <input type="checkbox"/> Human Factors <input type="checkbox"/> Structural/Mechanical <input type="checkbox"/> Other		
CLEANUP ACTIONS:					
DISPOSAL METHODS AND LOCATION:					
AFFECTED AREA SIZE:		SURFACE TYPE: <i>(gravel, asphalt, name of river etc.)</i>		RESOURCES AFFECTED/THREATENED: <i>(Water sources, wildlife, wells, etc.)</i>	
COMMENTS:					

ADEC USE ONLY

SPILL NAME:		NAME OF DEC STAFF RESPONDING:		C-PLAN MGR NOTIFIED? <input type="checkbox"/> Yes <input type="checkbox"/> No	
DEC RESPONSE: <input type="checkbox"/> Phone follow-up <input type="checkbox"/> Field visit <input type="checkbox"/> Took Report		CASELOAD CODE: <input type="checkbox"/> First and Final <input type="checkbox"/> Open/No LC <input type="checkbox"/> LC Assigned		CLEANUP CLOSURE ACTION: <input type="checkbox"/> NFA <input type="checkbox"/> Monitoring <input type="checkbox"/> Transferred to CS or STP	
COMMENTS:		Status of Case: <input type="checkbox"/> Open <input type="checkbox"/> Closed		DATE CASE CLOSED:	
REPORT PREPARED BY:			DATE:		



OIL & HAZARDOUS MATERIALS INCIDENT FINAL REPORT

The following written report is required by State regulations 18 AAC 75.300(e), following departmental notification of a discharge of oil and hazardous materials. The report is due within 15 days after the cleanup is completed, or if no cleanup occurs, within 15 days after the discharge. Forward the report to the nearest DEC office of the department. The report must contain, as applicable:

1. Date and time of the discharge:	
2. Location of the discharge:	
3. Name of the site, facility or operation:	
4. Name, mailing address, and telephone number of:	
A. Person or persons causing or responsible for the discharge:	B. Owner and operator of the site, facility or operation:
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
5. Type and amount of each oil or hazardous substance discharged:	
6. Cause of the discharge:	
7. Description of any environmental damage caused by the discharge or containment, to the extent the damage can be identified:	

8. Description of cleanup actions taken:	
9. Estimated amount of: (A) oil or hazardous substance cleaned up: _____ (B) oily or hazardous waste generated: _____	
10. Date, location, and method of ultimate disposal of the oil, hazardous substance and any contaminated materials, including cleanup materials:	
11. Description of actions being taken to prevent recurrence of the discharge:	
12. Other information the department requires to fully assess the cause and impact of the discharge (receipts for disposal if available):	
Signature	Printed name
Date	Title

MAIL OR FAX TO the Closest A.D.E.C. Office below

Anchorage

Phone: 269-3063
 Fax: 269-7687
 555 Cordova Street
 Anchorage, AK 99501

Fairbanks

Phone: 451-2121
 Fax: 451-2362
 610 University Ave.
 Fairbanks, AK 99709-3643

Juneau

Phone: 465-5340 Fax:
 465-5245
 P.O. Box 111800
 Juneau, AK 99801-1800

DEC USE ONLY

ADEC Project Manager:	ADEC Spill #:
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Appendix D: Forms and Inspection Checklists

Appendix D

Forms and Inspection Checklists

CONTENTS

- AST Visual Inspection Checklist
- Containment Drainage Log
- Record of Changes to the Plan
- Record of Plan Review
- Personnel Training Log

NOTE:

Alternative formats may be used for the Forms and Logs provided in this appendix provided the basic content remains the same.

Copies of completed forms and logs may be maintained in the following appendices of this plan or in a file maintained by the Facility Designee.



AST Visual Inspection Checklist

Inspector Name: _____ Inspection Date: _____

Facility Name: _____ City: _____ ZIP: _____

of Tanks Inspected: _____ Tank IDs: _____

Any item marked "No" requires additional information to describe the condition and date the condition is corrected.

	ITEM	STATUS	COMMENTS / DATE CORRECTED
--	------	--------	---------------------------

Primary Tank and Piping

1	Is tank exterior (roof, shell, ends, connections, fittings, valves, etc.) free of visible leaks? <i>Note: If "No", identify tank and describe leak.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Is aboveground piping (valves, fittings, connections, pumps, etc.) free of visible leaks? <i>Note: If "No", identify location and describe leak.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Is the tank, ladder, aboveground piping, and other structural elements secure with no sign of severe corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4	Are all tank openings properly sealed (capped, plugged, covered, blind flanged, etc.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Is the tank liquid level gauge readable and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6	Is overfill prevention equipment in good working condition (overfill valve, audible alarm, etc.)? <i>Note: Verify operation of audible alarms.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
7	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
8	Are all labels on the tank legible?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10	Is the surrounding vegetation free of signs of stress (discoloration, dead plants, etc.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
11	Is the vent pipe free of obstructions and are gaskets in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12	Are the tank supports in good condition and level?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Double-Wall Tank

13	For double-wall tanks, is interstice free of liquid?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
14	For double-wall tanks, is interstitial monitoring equipment in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Containment (Diking/Impounding)

15	Is the containment free of liquid, debris, combustible materials, and empty or full drums/barrels?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
16	Are dike drain valves closed and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
17	Are containment egress pathways clear and any gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Portable Containers

18	Are portable containers free of noticeable distortions, dents, buckling, bulging, or leaks?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
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Other Conditions

19	Is the system free of any other conditions needing to be addressed for continued safe operation or that may affect the site SPCC Plan?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
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CONTAINMENT DRAINAGE LOG FOR STORM WATER DISCHARGE AND SNOW REMOVAL

APPENDIX D: FORMS AND INSPECTION CHECKLISTS

Log of Containment System Inspection

Containment System: _____

Name of Inspector: _____ **Date Inspected:** _____

Is there visual evidence that the water or snow in the containment area is contaminated?

No Yes, describe:

Approximate volume of water released _____ gallons / snow removed _____ cubic feet.

Date and time that the valve on the containment system was closed after releasing water: _____

Was contamination effectively removed using absorbents and other supplies? Yes No

Containment System: _____

Name of Inspector: _____ **Date Inspected:** _____

Is there visual evidence that the water or snow in the containment area is contaminated?

No Yes, describe:

Approximate volume of water released _____ gallons / snow removed _____ cubic feet.

Date and time that the valve on the containment system was closed after releasing water: _____

Was contamination effectively removed using absorbents and other supplies? Yes No

Containment System: _____

Name of Inspector: _____ **Date Inspected:** _____

Is there visual evidence that the water or snow in the containment area is contaminated?

No Yes, describe:

Approximate volume of water released _____ gallons / snow removed _____ cubic feet.

Date and time that the valve on the containment system was closed after releasing water: _____

Was contamination effectively removed using absorbents and other supplies? Yes No

Containment System: _____

Name of Inspector: _____ **Date Inspected:** _____

Is there visual evidence that the water or snow in the containment area is contaminated?

No Yes, describe:

Approximate volume of water released _____ gallons / snow removed _____ cubic feet.

Date and time that the valve on the containment system was closed after releasing water: _____

Was contamination effectively removed using absorbents and other supplies? Yes No

Appendix E: Best Management Practices

Appendix E

Best Management Practices

CONTENTS

- Portable Storage Units
- Fuel and Oil Transfer Procedures
- Mobile Refuelers
- Spill Kits

BMP FACT SHEET: PORTABLE STORAGE UNITS

This BMP Fact Sheet is consistent with ARNG Bureau Policy Memorandum dated 24 October 2007 and is applicable to portable oil storage containers that are 55 gallons or larger, such as fuel pods, blivits, skids, and drums.

APPENDIX E: BEST MANAGEMENT PRACTICES

Using Portable Oil-Storage Containers

Implement the following control measures when using portable oil-storage containers for the storage and/or accumulation of fuel, used oil, and other petroleum products:

1. Ensure that the material being stored in the portable unit is clearly marked on the outside of the unit (i.e., Jet A, MoGas, Diesel).



2. Position the unit in a secure area that can be visually monitored by AKARNG personnel.
3. To the maximum extent possible, avoid positioning the unit near a storm drain, pond, or other environmentally sensitive area.
4. Verify the volume of product in the unit before adding additional product to the unit.
5. Keep fill-ports closed at all times, unless product is being added to the unit.
6. Ensure that a spill kit is readily accessible to the area where the portable unit is located.

Secondary Containment Requirements

Stationary Mode	Onsite Movement of POL
Provide localized containment equivalent to 110% of the largest Portable Oil-Storage Container.	Provide localized containment capable of containing the most likely spill discharge volume.
Guidance related to the storage of Empty Portable Containers is provided on Page E-2. Additional guidance is provided in Section 10.0 of the SPCC Plan.	

BMP FACT SHEET: PORTABLE STORAGE UNITS

This BMP Fact Sheet is consistent with ARNG Bureau Policy Memorandum dated 24 October 2007 and is applicable to portable oil storage containers that are 55 gallons or larger, such as fuel pods, blivits, skids, and drums.

Storing Empty Portable Oil-Storage Containers

Empty Portable Storage Containers do not Require Secondary Containment

Implement the following management practices when storing empty portable-oil storage containers at facilities operated by the AKARNG:

1. Visually inspect the portable oil storage container to ensure that it is completely empty.
2. Lock or otherwise secure the fill-port so that fuel or other petroleum products cannot be put into the container without proper authorization.
3. Tag or otherwise mark the container as "Empty."



BMP FACT SHEET: FUEL AND OIL TRANSFER PROCEDURES

Fueling Duties

Fuel and Oil Delivery:

- Drivers of bulk tankers must stay with the vehicle during entire transfer of fuel and motor oils. Facility personnel should also monitor the truck during delivery.
- Before transfer of fuel and oil, facility personnel must read the gauges on the AST receiving the fuel or oil to ensure that there is enough available capacity.



Fueling and Oil Transfer Practices:

- Do not “top off” the tank.
- Use drip pans during product transfer to collect small leaks.
- Place spill kits at transfer locations and with each service vehicle.
- Avoid outdoor refueling when it is raining

Why Fueling Procedures are Necessary and Must be Followed

Mechanical malfunction or operator error, such as overfilling, can result in the release of fuel. Even small drips can contribute to the release of fuel and contaminants into surface waters or storm drains.

BMP FACT SHEET: MOBILE REFUELERS

Unless Guard Mission dictates otherwise, NGB Policy is that upon return to Home Station, MFTs will be off-loaded to a residual level necessary to keep the seals on the MFT Storage Compartments from drying out.

Mobile Fuel Trucks Storing Fuel

It is strongly recommended that MFTs that are storing fuel be parked in an area that provides localized containment capable of containing the most likely spill discharge volume. At a minimum, spill kits will be maintained in the vicinity of the MFTs to satisfy the general secondary containment requirements defined in 40 CFR 112.7(c).



Check Drainage Valves: Ensure that drainage ports on containment pad are in closed position.

Check Containment Structure: Look for cracks or other damage that may limit its ability to contain a potential spill.

Empty MFTs (Excluding Residual Levels)



MFTs that are empty are considered transportation assets by the EPA and are not regulated as storage tank systems. When an MFT arrives at the facility, visually inspect the MFT to ensure that it is empty.

BMP FACT SHEET: SPILL KITS

Personnel working at AKARNG facilities may discover spills involving used oil, contaminated fuel, anti-freeze, and other HAZMAT.

Spill Kits

When to Use a Spill Kit – Use of spill kits is authorized for any incidental or uncontrolled release.



Where to Keep Spill Kits – Spill kits should be maintained in locations that make them easily accessible in the event of a spill. Recommended locations include areas of a facility that are near ASTs, mobile refuelers, and other likely spill sources.

What Kind of Spill Kit to Request - When requesting spill kits, make sure that the selected kit contains absorbents that are suitable to the material that is likely to be spilled. For example, some absorbents are designed exclusively for oils while others are designed to absorb fuels, anti-freeze, oils, acids, and water. Check with the vendor before making selection.



Contact the Water Resource Program Manager for Tank Management or Spill Prevention & Response questions

Appendix F: Secondary Containment Capacity Calculations

Appendix F

Secondary Containment Capacity Calculations

APPENDIX F: SECONDARY CONTAINMENT CAPACITY CALCULATIONS

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- Exhibit F-1: Hangar 4 Drainage Features
- Exhibit F-2: Hangar 6 Drainage and Containment Features
- Exhibit F-3: Ground Support Building No. 47428 Drainage and Containment Features
- Exhibit F-4: Ground Support Building No. 47429 Drainage and Containment Features
- Exhibit F-5: Control Tower Generator Secondary Containment
- Exhibit F-6: Tank Farm Truck Containment Drainage Features

SECONDARY CONTAINMENT AND DRAINAGE CAPACITIES BY LOCATION

Exhibit F-1: Hangar 4 Drainage Features

Site Feature	Length (Inches)	Width (Inches)	Depth 1 (Inches)	Depth 2 (Inches)	Avg Depth (Inches)	Volume (Cubic Feet)	Capacity (Gallons)
Trench 1 – Deepest End	156	10.5	9	25.5	17.3	16.4	122
Trench 1 – Drain Location	144	10.5	10	25.5	17.8	15.5	116
Trench 1	300	10.5	8	10	9	16.4	123
Trench 1	300	10.5	4	8	6	10.9	82
Trench 1 – Shallowest End	326	10.5	0.5	4	2.3	4.5	33
Trench 2 – Deepest End	156	10.5	9	25.5	17.3	16.4	122
Trench 2 – Drain Location	144	10.5	10	25.5	17.8	15.5	116
Trench 2	300	10.5	8	10	9	16.4	123
Trench 2	300	10.5	4	8	6	10.9	82
Trench 2 – Shallowest End	326	10.5	0.5	4	2.3	4.5	33
Total Capacity:							953

Exhibit F-2: Hangar 6 Aircraft Area Drainage and Containment Features

Site Feature	Length (Inches)	Width (Inches)	Depth 1 (Inches)	Depth 2 (Inches)	Avg Depth (Inches)	Volume (Cubic Feet)	Capacity (Gallons)
Trench 1	1,069	24	7	10	8.5	126.2	944
Trench 1 Sump	24	24	–	–	20	6.7	50
Trench 2	955	24	7	10	8.5	112.7	843
Trench 2 Sump	24	24	–	–	23	7.7	57
Trench 3	955	24	7	10	8.5	112.7	843
Trench 3 Sump	24	24	–	–	26	8.7	65
Trench 4	955	24	7	10	8.5	112.7	843
Trench 4 Sump	24	24	–	–	23	7.7	57
Trench 5	1,069	24	7	10	8.5	126.2	944
Trench 5 Sump	24	24	–	–	22	7.3	55
Collection Sump	60	60	–	–	69.5	144.8	1,083
Used Oil Tank Room Floor	600	240	–	–	0.5	41.7	312
Total Capacity:							6,097

Exhibit F-3: Ground Support Building No. 47428 Drainage and Containment Features

Site Feature	Length (Inches)	Width (Inches)	Depth 1 (Inches)	Depth 2 (Inches)	Avg Depth (Inches)	Volume (Cubic Feet)	Capacity (Gallons)
Center Sump	22.5	10.5	–	–	11	1.5	11
North Trench	117.8	4	10	11	10.5	2.9	21
South Trench	117.8	4	9	11	10	2.7	20
Generator Storage Area	480	480	–	–	0.5	66.7	499
Total Capacity:							552

Exhibit F-4: Ground Support Building No. 47429 Drainage and Containment Features

Site Feature	Length (Inches)	Width (Inches)	Depth 1 (Inches)	Depth 2 (Inches)	Avg Depth (Inches)	Volume (Cubic Feet)	Capacity (Gallons)
Containment Basin	1,188	161	–	–	12	1,328.3	9,935
East Slope	66	161	0	12	6	36.9	276
West Slope	66	161	0	12	6	36.9	276
Pop Up Containment for TPUs	144	96	–	–	12	96	718
Total Capacity:							11,205

Exhibit F-5: Control Tower Generator Secondary Containment

Site Feature	Length (Inches)	Width (Inches)	Depth 1 (Inches)	Depth 2 (Inches)	Avg Depth (Inches)	Volume (Cubic Feet)	Capacity (Gallons)
Outer Base Tank	77.8	42	–	–	24	45.4	339
Total Capacity:							339

Exhibit F-6: Tank Farm Truck Containment Drainage Features

Site Feature	Length (Inches)	Width (Inches)	Depth 1 (Inches)	Depth 2 (Inches)	Avg Depth (Inches)	Volume (Cubic Feet)	Capacity (Gallons)
North Slope	126	144	0	9	4.5	47.3	353
Center Sump	708	144	–	–	9	531	3,972
South Slope	126	144	0	9	4.5	47.3	353
Total Capacity:							4,679