

ATTACHMENT 17
SPILL PREVENTION, CONTROL, &
COUNTERMEASURE PLAN (SPCC)



ENVIRONMENTAL MANAGEMENT, INC.

**SPILL PREVENTION CONTROL AND
COUNTERMEASURE PLAN**

2019

**5200 NE HIGHWAY 33
GUTHRIE, OK 73044**

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

GENERAL INFORMATION:

Name of facility: **ENVIRONMENTAL MANAGEMENT, INC.**
Type of facility: Emergency Response and Waste Management
Address: 5200 NE Highway 33
Guthrie, OK 73044-9633

NAME AND ADDRESS OF OWNER OR OPERATOR:

Name: Terry D. Bobo, President
Address: PO Box 700
Guthrie, OK 73044-0700

DESIGNATED PERSON(S) ACCOUNTABLE FOR THE SPCC PLAN AT THIS FACILITY:

Name and title: Terry D. Bobo, President
Keeton Hill, Terminal Manager

Has this facility experienced a reportable fuel spill event during the twelve months prior to the preparation of this plan? NO

MANAGEMENT APPROVAL:

This SPCC Plan will be implemented as described herein by:

Name: Terry D. Bobo Title: President

Signature: Terry D. Bobo

CERTIFICATION:

I hereby certify that I have examined the facility and or records, documents, files etc. of the facility and being familiar with the provisions of 40CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

Printed Name of Professional Engineer _____

Seal

Signature of Registered Professional Engineer

Registration No. _____ State _____

Date: _____

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1.0 Introduction

1.1 Goal of the SPCC Program

The goal of the Spill Prevention Control and Countermeasure Program (SPCC) is to prevent the discharge of harmful quantities of products and/or waste material that could reach the navigable waters of the United States. The definitions of key words are presented below:

Discharge includes, but is not limited to any spillage, leakage, pumping, pouring, release or dumping of products and/or waste material from their designated containers except for their intended use or final disposal.

Harmful Quantities is the amount of a spilled products and/or waste material that could arrive at a protected water body rather than the amount of the spill at the source of the discharge. With proper containment and removal, a large initial discharge may not result in a harmful quantity reaching a protected water body. For a protected water body however, the allowable amounts are severely restricted and a very small amount can be a harmful quantity. An amount that would violate applicable water standards or cause a film or sheen on the surface of a navigable waterway is considered to be potentially harmful.

Product and/or waste material includes any kind or form of a product, compound, including but not limited to diesel fuel, kerosene, gasoline, motor oil, sludge, and/or waste oil. At this location it includes but is not limited to diesel fuel, gasoline and a variety of discarded material and used oil. Within this plan, the preceding will be collectively referred to as products and/or waste materials.

Navigable Waterways includes not only the expected interstate waters (lakes, rivers and streams) which are obviously subject to federal regulation but also the intrastate waters utilized by or supplying food (fish) to people from other states. At this location, there are no navigable waterways.

1.2 Governing Regulations and Guidance

1.2.1 Federal Regulation

Title 40 Code of Federal Regulations, Part 112, Oil Pollution Retention is the governing document that describes the contents and use of SPCC plans. This regulation has two sets of requirements – the Spill Prevention Control and Countermeasure (SPCC) Plan rule (an oil spill *prevention* program – addressed with this document), and the Facility Response Plan (FRP) rule (an oil spill *response* program). In 7.0 found later in this plan, there is a document, Certification of the Applicability of the Substantial Harm Criteria for the Facility Response Plan (FRP) that certifies Environmental Management, Inc. does not meet the volume criteria for needing an FRP (response) plan.

1.2.2 State Regulation

Oklahoma does not have specific regulations that require a SPCC plan. Therefore, this plan has been developed to meet the requirements set forth in Part 40 of the Code of Federal Regulations, Part 112. Oklahoma does, however, have spill reporting requirements for both waste and petroleum products. The Oklahoma Corporation Commission (OCC) requires notification on spills of 25 gallons or more, involving underground or aboveground storage tanks containing petroleum products, any place within the State of Oklahoma. The phone number for the OCC is (405) 522-5264. The Oklahoma Department of Environmental Quality (ODEQ) also requires notification of spills of petroleum products in the amount of 25 gallons or more, or spills that leave a visible sheen on any waters of the state (spills of any amount that reaches water). The hotline number is **1-800-522-0206** for further assistance in reporting. The ODEQ will notify the OCC representative for emergencies and after normal business hours if the incident requires. Environmental Management procedures require any spills to be reported to the Terminal Manager at (405) 282-8510, or alternatively the Safety Officer. The Terminal Manager or Safety Officer will contact the President of the company and convey all the information about the spill. The President will then contact the OCC and/or ODEQ to report the release, if required.

1.3 Purpose of the SPCC Plan

The purpose of the SPCC plan is to provide facility personnel with a reference that:

- ◆ Contains the federal requirements for the prevention, control and clean up of spills
- ◆ Discusses the regulatory requirements in the context of the facility
- ◆ Provides operational guidelines and specific instructions on how to prevent, control and/or remediate petroleum spills.

1.4 Plan Responsibility

The individual identified at this facility that has been designated as the SPCC Program Manager is the Terminal Manager who will be responsible for the implementation, training and execution of the SPCC Program at this facility. He will train the Safety Officer and one or more alternates so there is a qualified person available at all times who is responsible for taking appropriate action whenever the need arises to properly and efficiently implement the SPCC plan.

1.5 Use of the Plan

The SPCC plan will be kept in a readily accessible location for use by the SPCC Program Manager or his representative in the conduct of normal business operations or responding to spills or leaks. Users of the SPCC Plan must be familiar with its contents and be knowledgeable with the sections that deal with:

- ◆ How products and/or waste materials can be released.
- ◆ Locations of critical valves and spill control points that can be used to control or limit spill sources or migration.
- ◆ Location of drainage paths that are most likely taken by spills.
- ◆ Actions that should be taken to minimize the effects of a spill.
- ◆ State or federal agencies and people that must be notified in the event of a spill.
- ◆ How to obtain additional assistance to mitigate a spill.

1.6 Outline of the Contents of the SPCC Plan

Section 1: "Introduction and Purpose of the SPCC Plan".

Section 2: "Site Description, Spill History and Spill Predictions" describes the facility, the spill history of the facility and the prediction for possible spill scenarios.

Section 3: "Flow Containment, Diversion and Drainage" describes the features of the facility that contains the surface route of potential spills.

Section 4: "Product and/or waste material Storage and Transfer" describes the above ground storage tanks, waste material containers and use of tank trailers for fueling operations.

Section 5: "Notification Requirements, Control and Countermeasures" discusses notification procedures, response procedures and countermeasures that will be taken in the event of a spill.

Section 6: "SPCC Program Administration" includes inspection records, training and security applicable to the SPCC program.

Section 7: Substantial Harm Criteria for 40 CFR 112 discusses the need for a Facility Response Plan (FRP) and includes a form certifying handling information.

2.0 Site Description, Spill History and Spill Predictions

2.1 Site Description:

This is a 29.49 acre site in the eastern edge Logan County near Guthrie, OK, 2.5 miles East of I-35 at 5200 NE Highway 33. It borders farms to the North, West, and East, and Highway 33 to the South. The site contains seven above-ground storage tanks (see Table 1 below) located on or adjacent to Dock 1 with the exception of Tank 1 located in front of Building 3. A site map showing the critical structures described in this plan can be found in Appendix A.

Table 1. EMI Tank Descriptions

Tank ID#	Type	Capacity	Tank Usage
1	Steel	40 yds ³	Fly Ash (product)
3	Stainless Steel	9000 gal	Nonhazardous Wastewater Storage
4	Open Top Steel	1500 gal	Oil/Water Separator
7	Open Top Steel	2500 gal	Oil/Water Separator
12	Steel	2000 gal	Used Oil
13	Steel	2000 gal	Used Oil
16	Steel	300 gal	Off-Road Diesel

2.2 Spill History:

Environmental Management has not experienced any reportable spills in the facility area in the history of the company. Steps have been taken to ensure ground and water quality by installing three monitor wells within the facility. The land this facility sits on has been sloped and graded to ensure any product and/or waste material spills will flow into three designated retention ponds at the southwest corner of the facility. Environmental Management has also developed a classification system for spills that is described as follows:

- ◆ Class I: A spill involving product and/or waste material that covers an area that is less than 2 feet in diameter and is of a non-continuing nature.
- ◆ Class II: A spill involving a product and/or waste material that covers an area that is less than 5 feet in diameter and is of a non-continuing nature.
- ◆ Class III: A spill involving a product and/or waste material that covers an area that is greater than 5 feet in diameter and of a non-continuing nature.

2.3 Predicted Spill Events:

The operations at this facility with the greatest potential for a spill event include:

- ◆ Delivery of diesel fuel (not gasoline) to the above ground storage tank (AST).
- ◆ Dispensing of fuel to company equipment.
- ◆ Transfer of containerized products and/or waste materials from vehicles to storage docks or areas.
- ◆ Transfer of used oil and/or non-hazardous bulk liquid to or from vehicles into or out of separator tanks or storage tanks.
- ◆ Transfer of used oil and/or water from the separator tanks to the holding or storage tanks.

These potential spill scenarios are discussed below:

2.3.1 Delivery of Fuel to the AST:

Off road diesel fuel is delivered by tank trucks to the AST. These tank trucks are compartmentalized according to Federal Department of Transportation regulations with non-manifolded sections capable of holding up to 2,500 gallons of fuel. Therefore, the greatest potential for a spill from the delivery of fuel is estimated to be about 2,500 gallons. The diesel is currently delivered by Bobtail truck loaded to a maximum 2,500 gallons. Such a spill would involve failure of the tank trucks primary and emergency fuel transfer valves and/or the occurrence of a tank/fuel line rupture.

The AST deliveries take place on a gravel surface. If the tank trucks spill is not contained in this area, or deployed booms cannot contain it sufficiently, the grounds are designed to ensure that it will flow toward the southwest corner of the facility into an impoundment. With the supplies, equipment, construction and manpower available it is a remote possibility the fuel could reach the impoundment.

2.3.2 Dispensing product to company equipment

Fuel is dispensed to equipment in a designated fuel pump area. If there were a spill, the fuel would be contained in the gravel-covered surface. Additional absorbent materials have been provided in the immediate area and additional materials are available from a storage location within 200 feet from the fuel pumps.

2.3.3 Transfer of containerized products and/or waste materials from vehicles to storage docks

The storage docks are concrete with containment curbing and a collection sump. In the event of a spill, the collection sump will contain up to 500 gallons of spillage. Then the containment curbing can hold up to 2,500 gallons. Routinely, the largest container is an 85 gallon drum. Therefore, excess containment is existent.

2.3.4 Transfer of used oil and/or non-hazardous liquid to or from vehicles into or out of separator and/or storage tanks

Used oil and/or non-hazardous liquids are transferred from recovery/vacuum vehicles into and out of oil/water separator tanks and/or storage tanks. The tanks are all set on

concrete flooring which is surrounded by curbing and has access to the sump containment system. Should a spill occur during one of these operations, all material would be confined to the concrete containment system and on-site equipment and personnel would be used to collect the materials and begin the recovery process.

2.3.5 Transfer of used oil and/or water from the separator tanks to the holding or storage tanks.

Once the separation has been accomplished, the used oil and/or non-hazardous liquids are transferred to another holding or storage tank. All holding or storage tanks, with the exception of Tank #3 which contains non-hazardous liquids and washwaters, are set on concrete flooring which is surrounded by curbing and has access to the sump containment system. Should a spill occur while transferring used oil to a storage tank, all material would be confined to the concrete containment system and on-site equipment and personnel would be used to collect the materials and begin the recovery process. Should a spill occur while transferring the separated water to the storage tank, the material will most likely be confined to the concrete area on which the separator tanks are set. If the non-hazardous water spills around Tank#3, the entire facility has a natural berm which would contain the liquids and on-site equipment and personnel would be used to collect the spilled material.

3.0 Flow Containment, Diversion and Drainage

3.1 Berms, Dikes and Curbs

The aboveground storage tanks (AST) constitute primary containment structures. There are no berms and dikes around the fuel AST located on this facility since the grounds are designed to ensure that major spills will flow toward the southwest corner of the facility into a pair of retention ponds. Minor spills will be contained by absorbent materials located at the AST. The used oil storage ASTs are set on concrete flooring which is surrounded by curbing and has access to a sump containment system.

3.1.1 Regulatory Guidance

Current regulations (sec.112.7) provide that one of the following preventive systems or it's equivalent should be used as a minimum at onshore facilities:

- ◆ Dikes, berms, or retaining walls sufficiently impervious to contain spilled oil;
- ◆ Curbing;
- ◆ Culverting, gutters, or other drainage systems;
- ◆ Weirs, booms, or barriers;
- ◆ Spill diversion ponds;
- ◆ Retention ponds; or
- ◆ Sorbent materials.

3.1.2 Dock Collection systems

The Key aspect in the collection of accumulated product, rainwater and/or waste material from the storage areas are:

- ◆ Each dock is outfitted with a containment curb and a collection sump for total retention of all materials in the event of a spill.
- ◆ Accumulated storm water may be pumped into the sewage lagoon without the need for treatment if a visual inspection is made for the presence of a petroleum sheen and none is found. The pumping system is physically separated from the dock.

3.1.3 Berms, Dikes and Curbs - Site Specific

The most significant containment feature at the facility is the graded slope of the facility grounds which routes liquids to the retention ponds in the southwest corner of the facility. The retention ponds have been constructed to contain more than 150 percent the total contents of the largest tank, vessel, drums, or combination of these within the working area. The bottoms of the retention ponds are clay; the low permeability reduces infiltration of accumulated surface water to groundwater underneath this area. In the event excess rainwater accumulates in the containment area and overflows the retention ponds, in accordance with Environmental Management's Storm Water Pollution Prevention Plan a visual inspection is conducted of any overflow to insure it is free of contamination. If any contamination such as petroleum residue is discovered, immediate action will be taken to reduce the possibility of the contamination leaving the site and the accumulated water will be pumped out using on-site waste transporter

equipment. In the over 30-year history of the site, no material other than rain water has reached the retention ponds and no overflow has contained contamination.

3.2 Interception and Containment of Spills

3.2.1 Regulatory Guidance

- ◆ Flow will be directed to an area of the facility that is not subject to flooding.
- ◆ If there are no basins, there should be a diversion system and a means for capturing the spilled product.
- ◆ Gravity flow is preferred. If lift pumps are used, one should be permanently installed with a spare pump readily available.

3.2.2 Interception and Containment of Spills - Site Specific

If a spill were to overflow the primary containment structure, it would flow into one of the three on-site retention ponds.

3.3 Off-site Containment and Diversion of Spills

There are no physical features that will divert the flow of products and/or waste materials off-site should a release occur. The property has been graded to prevent the off-site flow of any products that might spill. The drainage from the tank area is encouraged to move toward the front gate but is then directed via a swale to a ditch along the front of the property leading to the retention ponds.

4.0 PETROLEUM PRODUCT STORAGE AND TRANSFER

4.1 General

Federal regulations (40 CFR 112) emphasize several requirements for aboveground storage tanks, product lines and other vessels used for the storage of petroleum products. Additionally, specific requirements have been established for the transfer (delivery/dispensing) of petroleum products. Each of the requirements that are specific to this facility is discussed below.

4.2 Aboveground Storage Tanks

Most of the SPCC guidance provided for aboveground tanks addresses the construction and control of the protective berm systems (See Section 3.0).

4.2.1 Regulatory Guidance

- ◆ Tanks should be constructed of materials that are compatible with their contents.
- ◆ Tanks should allow for variations in temperature and pressure.
- ◆ Tank design including any retrofit should consider the same fail-safe features including but not limited to high level alarms, high level cutoff devices, communication system between the tank gauge and pump controller, fluid level view gauge or remote fluid monitoring equipment.

4.2.2 Aboveground Storage Tanks - Site Specific

Tank	Capacity (gallons)	Type of Product	Construction Material
4	1500	Oil/Water Separator	Open Top Steel
7	2500	Oil/Water Separator	Open Top Steel
12	2000	Used Oil	Steel
13	2000	Used Oil	Steel
16	300	Off-road Diesel	Steel

All tanks are welded steel construction.

4.3 Product Transfer Lines

There are no product transfer lines associated with any of the tanks or operations in this facility with the exception of piping from one tank to the filler pump and filler hoses used to transfer fuel from the tank into vehicles.

4.4 Receiving Petroleum Products

4.4.1 Regulatory Guidance

- ◆ At a minimum, fuel transfers must comply with the Department of Transportation requirements.

- ◆ Transfer areas should prevent the rapid drainage of spilled material. Containment should exist to hold the contents of the largest tank or compartment associated with the transfer.
- ◆ Prior to departure from the area of the fuel drop, correct disconnect procedures for the transfer line should be assured by the driver and verified by the Environmental Management Employee.
- ◆ Prior to the departure of the (unloading) transport vehicle, the driver should check for loose and/or leaking outlets and valves. If such connections are observed, the driver will be required to correct the problem before leaving the unloading area.

4.4.2 Receiving Petroleum Products - Site Specific

Delivery of petroleum products to the aboveground tank is one of the most likely operations that could result in a spill. Although there is a limited volume of product involved, the following instructions have been developed if a spill should occur at this location.

1. Environmental Management will require all transport drivers to check their equipment and that of the receiving vessel before unloading begins.
2. An Environmental Management representative, will direct the transport operator to the fuel pump area, unlock the appropriate tank fill cap, visually determine there is sufficient room in the tank to receive the load, and repeat the required quantity to the transport operator.
3. The transport operator will be instructed to follow all DOT regulations applicable to the off-loading of fuel. He will be instructed to continuously monitor the unloading by visually observing the flow meter on the delivery truck and the tank gauge. The Environmental Management representative will instruct the transport driver where to find absorbent materials and how to get assistance if there is a spill or emergency situation.
4. When the delivery is complete, the Environmental Management representative will verify the amount transferred on the meter, inspect the off-loading area to make sure that proper disconnects have been made and there are no leaks on the transport or tank.

Environmental Management recognizes that fuel and product and/or waste material transfers represent the most likely cause of a surface spill.

5.0 NOTIFICATION REQUIREMENTS, CONTROLS AND COUNTERMEASURES

5.1 Notification Requirements

Environmental Management recognizes that the regulatory agency with responsibility for spill oversight depends on origin of the release; amount of the release; type of the material released (gasoline, diesel fuel, oils, products or waste materials); type of the hazard (toxicity or flammability); and, spill impact area (navigable waterway, surface soils, etc.). Environmental Management assigns the responsibility for informing the required agencies to the President of the company. Therefore, the notification responsibility for the involved employees is as follows:

IMMEDIATELY FOLLOWING ANY CLASS II or III SPILL, THE PERSON OBSERVING THE SPILL HAS THE RESPONSIBILITY FOR NOTIFYING ENVIRONMENTAL MANAGEMENT'S TERMINAL MANAGER OF THE SITUATION. ENVIRONMENTAL MANAGEMENT PERSONNEL WILL BE ASSIGNED TO HANDLE THE SITUATION AND OUTSIDE NOTIFICATIONS WILL BE MADE BY THE PRESIDENT OF THE COMPANY, AS REQUIRED.

The Terminal Manager or his designee is responsible for the following:

1. Documenting the details of the release on the Spill Report Record. The form can be found in Appendix B.
2. Discussing the details of the release, the control and countermeasure that are underway and the potential environmental impacts with the President of the company.

Based upon input from the Terminal Manager, the President will make the necessary notifications as required.

5.2 Controls

There are two types of control methods: those actions that counter the migration of the released material from a storage tank or piping, and those that control the quantity released. Each of the control measures is discussed below.

5.2.1 Controlling Spill Migration

Section 3 discusses the drainage and containment features that can control released products and/or waste materials at this facility. Refer to the appropriate figure(s) in Appendix A to locate the spill control points.

5.2.2 Controlling the Quantity Released

If an instantaneous surface spill has occurred from a transport truck, it will be very difficult to limit the amount of the release. Every effort must be made to stop the flow of product by closing valves or turning off pumps and/or motors and then using booms or absorbent materials to contain the product.

However, if the release is the result of a leak, it may be possible to undertake mitigation measures until a permanent repair can be made. Depending on the location of the leak, it may be necessary to shut off valves until the leak can be isolated and also supply additional catch pans or drums to control the leaking product and/or waste material.

5.3 Countermeasures and Clean-up

There are a number of clean-up procedures that can be employed to remove the product and/or waste material from the area(s) impacted by a spill. The methods presented in the plan are not considered to be inclusive. In selecting the appropriate clean-up method, the health and safety of the personnel involved in the clean-up will be taken into account. Also, the presence of harmful vapors, or the threat of ignition from a flammable atmosphere will be considered. Any spill should be reported to the Terminal Manager and personnel will be directed to follow the applicable safety information provided on the Safety Data Sheet (SDS) for the product or senior staff member direction on waste material that has been spilled.

5.3.1 Spills Less Than 10 Gallons on Concrete:

Absorb the spill with appropriate absorbent material (e.g. Oil Dry) and sweep clean. Based on the type of material spilled, the resulting clean-up materials will either be containerized for proper hazardous disposal or put directly into a non-hazardous consolidation container such as a rolloff. If a drum is used, it will be properly labeled.

5.3.2 Pooled Spills on Concrete

Regardless of type of material spilled, the area of a pooled spill should be controlled for unauthorized personnel access and further dangerous circumstances. Based on the type of material spilled, the appropriate clean-up equipment will be utilized. If flammable liquids have been spilled, an explosion-proof vacuum pump will be used to transfer the spilled material to an appropriate grounded/bonded DOT approved container or vehicle. If a drum is used, it will be properly marked and labeled. Non-hazardous liquids will be pumped into an appropriate holding tank or container.

5.3.3 Non-Pooled Spills on Gravel or Dirt

Booms will be placed along the down gradient edge of the spill to prevent any run-off. Absorbent materials appropriate for the spilled material will be applied to recover as much of the spilled product as possible. As much of the saturated absorbent as possible will be removed before placing additional absorbent material on the spill. Once the absorbent is removed, excavation of the contaminated gravel or dirt will occur until visual inspection of the excavation area shows no more contamination. Absorbents and excavated material will either be containerized and labeled for proper hazardous disposal or put directly into a non-hazardous consolidation container such as a rolloff.

5.3.4 Non-Pooled Spills in Snow or Ice

Booms will be placed along the down gradient edge of the spill to prevent any run-off. Absorbent materials appropriate for the spilled material will be applied to recover as much of the spilled product as possible. As much of the saturated absorbent as possible will be removed before placing additional absorbent material on the spill. Once the absorbent is removed, excavation of the contaminated snow, ice, and ground below will occur until visual inspection of the excavation area shows no more contamination. Absorbents and excavated material will either be containerized and labeled for proper hazardous disposal or put directly into a non-hazardous consolidation container such as a rolloff.

5.3.5 Recovery from Surface Water

Due to the complexity and sensitivity of recovering released product and/or waste materials from surface water bodies, the Terminal Manager or an Emergency Response Coordinator will ensure proper procedures are followed.

5.4 Basic Spill Clean-up Equipment

For quick response, the following clean-up items are always maintained at the facility in a readily accessible location:

- ◆ bags of absorbent material
- ◆ brooms
- ◆ shovels (non-sparking)
- ◆ squeegees
- ◆ absorbent booms
- ◆ absorbent pads
- ◆ vacuum tanker
- ◆ front-end loader
- ◆ track hoe
- ◆ drums
- ◆ and many other items too numerous to list

6.0 SPCC PROGRAM ADMINISTRATION

6.1 Inspection and Record Keeping

The SPCC Program requires that inspections be conducted using written evaluation criteria that are part of the SPCC Plan. A comprehensive schedule and checklist for the inspection, maintenance, and repair of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment has been developed (see facility's Development and Operations Plan for schedule and checklist). The Inspection Checklist indicates the areas to be inspected and what should be examined. The Inspection Schedule details the frequency of the inspections. The frequency of the inspection is based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between

inspections. Daily and/or weekly facility inspections will only be performed when the facility is operational (i.e., product and/or waste activities are in progress) All inspection records MUST be retained onsite for a minimum of three (3) years.

6.2 Training

The SPCC Administrator and designated alternate(s) should thoroughly understand the facility's SPCC plan and be able to execute the plan effectively if a spill event should occur. Personnel assigned to or working at the facility, must be trained to correctly operate transport equipment used to transport any products into or from the facility, the aboveground storage tank system, and the used oil/water separator system. They should be aware of the SPCC plan and thoroughly understand their role if the plan is implemented. The SPCC Administrator or designated alternate must regularly educate site personnel in the basic steps involved in minimizing the amount of a release and how to control the extent of a spill's migration. Documentation of SPCC training will be made using safety meeting or training sign in sheets, and maintained with the rest of the training files. Training may be designated as Site Specific Contingency and Emergency Action Training, as long as the specifics of the SPCC program are addressed. Retain a copy of the sign in sheet in the Company training files for a period of three (3) years.

6.3 Site Security

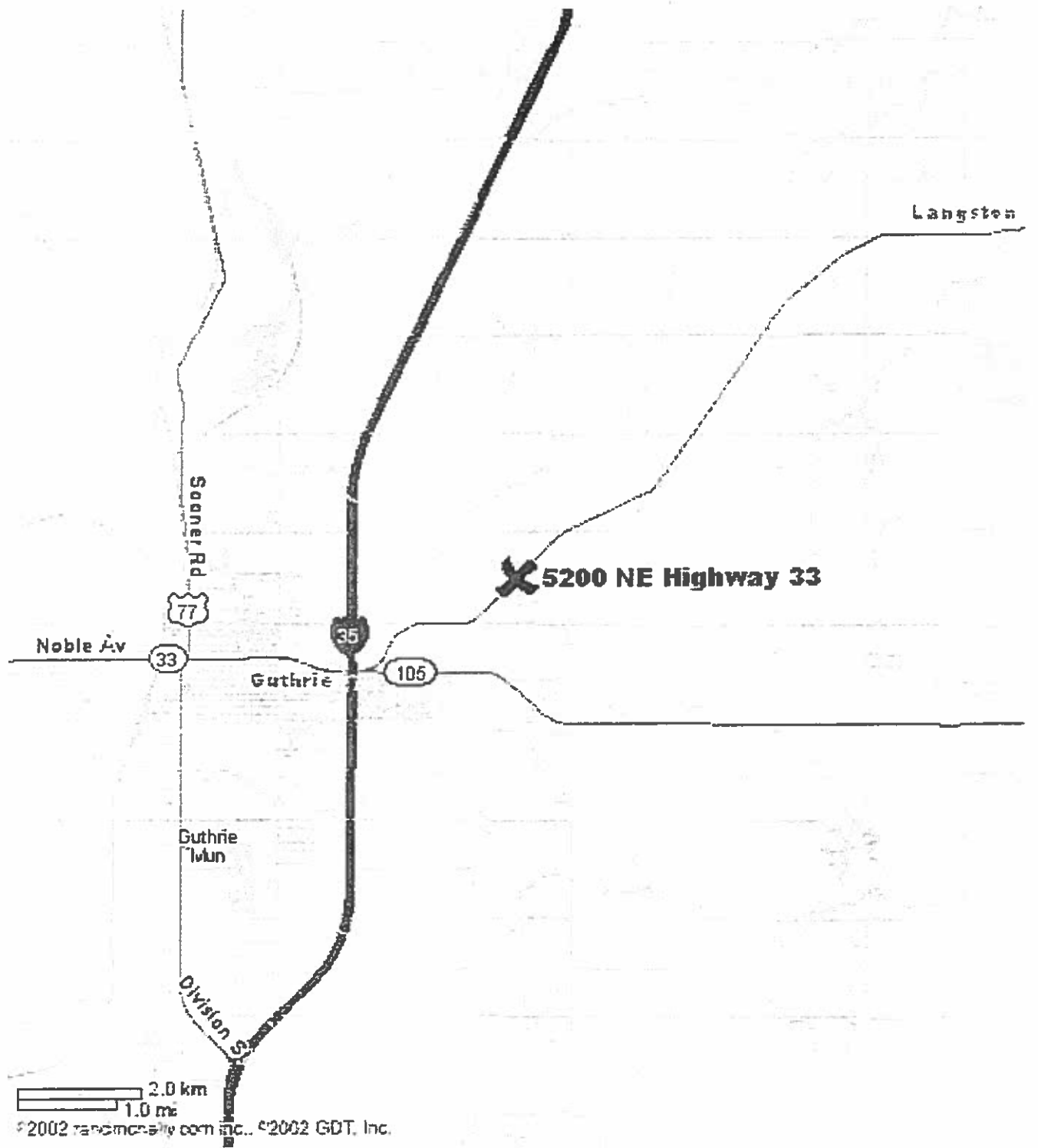
Site security has a direct bearing on the prevention of spills and should be periodically evaluated by Management. Security evaluations should determine if:

- ◆ Additional fencing or locks are needed to prevent unwanted intruders.
- ◆ Drains or valves that could release products are locked or properly controlled when not in use.
- ◆ Unattended pump controls are locked in the "off" position at the end of each duty day and when not attended or in use.
- ◆ Facility lighting is sufficient to discourage vandalism and facilitate the discovery of spills by company personnel.
- ◆ Vehicles, rolloff boxes, or tanks that contain products and/or waste materials awaiting transport or disposal have safeguards in place to prevent accidental or intentional release.

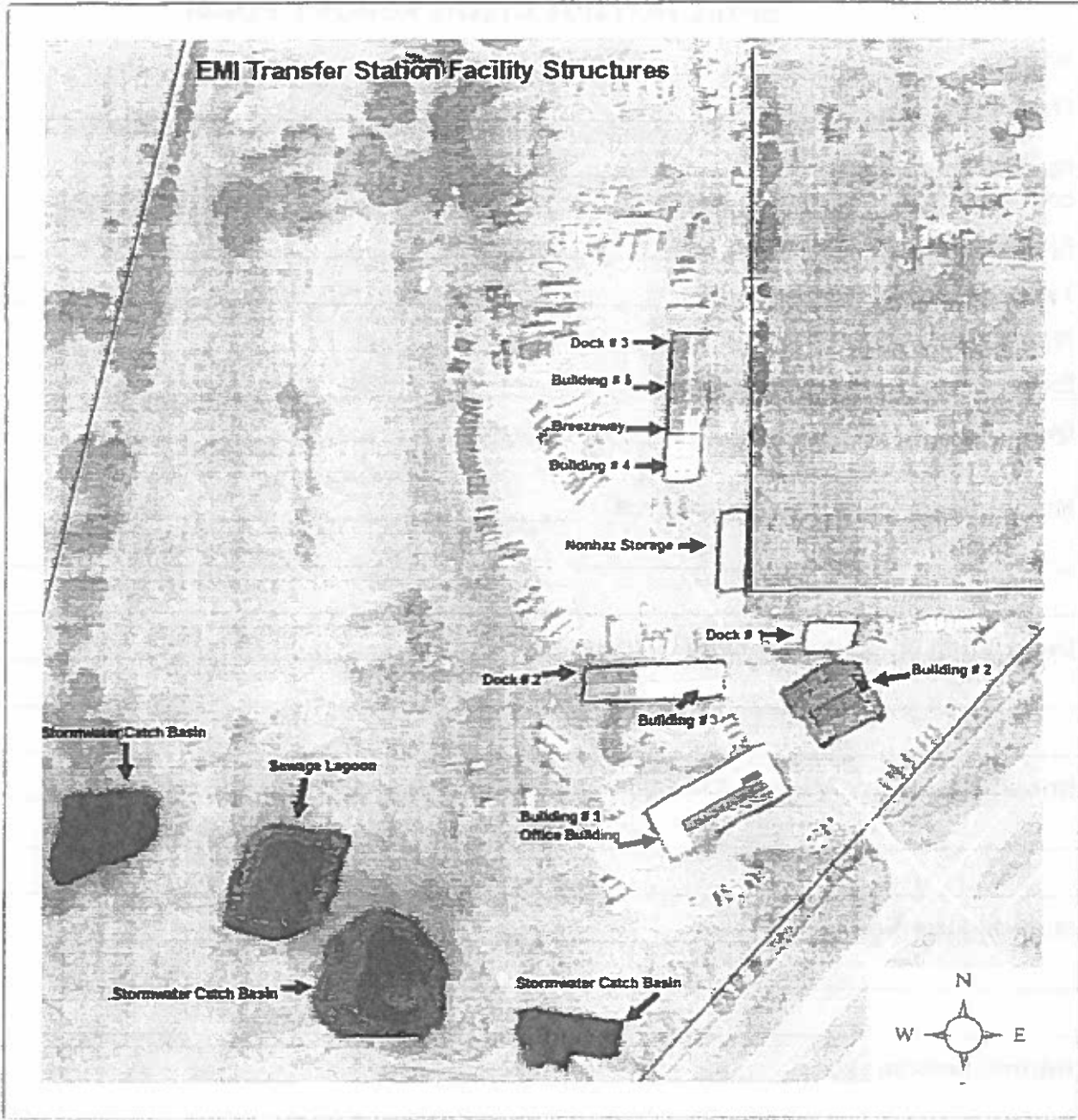
7.0 Substantial Harm Criteria for 40 CFR 112

7.1 Applicability Provisions

You must comply with the requirements of 40 CFR 112 if you meet the applicability provisions set out in each rule. While this SPCC plan deals with prevention, the next step would be the response to a spill. The response efforts we will mount, in the event of a spill, are addressed in the pages of this SPCC Plan. Certification of the Applicability of the Substantial Harm Criteria for the Facility Response Plan (FRP) certifies Environmental Management, Inc. does not meet the total oil storage capacity for requiring an FRP response plan. See attached "Appendix C".



APPENDIX A



Appendix B

SPILL NOTIFICATION REPORT FORM

Date: _____ Time: _____

First responder _____

Facility emergency coordinator _____ Contact number(s) () () _____

Spill location _____

Type of release _____

Material released _____

Extremely hazardous substance? Yes No _____

Quantity released _____ Gallons _____

Medium into which release occurred _____

Description of incident leading to release _____

Knowledge of any Acute or Chronic Health Risks associated with the release: _____

Medical attention given: _____

Injured person(s): _____

Telephone notifications: ODEQ Notified (If Applicable) OCC Notified (If Applicable) _____

Follow-up written notifications _____

Appendix C

Title 40 CFR 112_Oil Pollution Prevention Attachment C-II

Certification of the Applicability
of the Substantial Harm Criteria
for the Facility Response Plan (FRP)

Facility Name: Environmental Management, INC.

Facility Address: 5200 Northeast Highway 33, Box 700, Guthrie, OK 73004

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

Yes ----- No --X--

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

Yes ----- No --X---

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix 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 DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.

Yes ----- No --X--

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

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

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

Yes ----- No --X--

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

Yes ----- No -X----

Certification

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

Signature _____



Name (please type or print) _____

Terry D. Bobo _____

Title _____

President _____

Date _____

May 2, 2019 _____