



Mohawk Solar Project

Preliminary Spill Prevention, Control, and
Countermeasure Plan

January 25, 2019

Mott MacDonald
412 Mount Kemble Avenue
Suite G22
Morristown NJ 07960
United States of America

T +1 (908) 730 6000
F +1 (973) 267 2890
mottmac.com



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DRAFT

Definitions

AC	alternating current
AST	Aboveground Storage Tank
BMP	best management practice
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
DC	direct current
EC	emergency coordinator
EI	environmental inspector
EPA	Environmental Protection Agency
ft	feet
GAL	gallon
gen-tie	generation tie line
HVAC	Heating, Ventilation, and Cooling
i.e.	An abbreviation for id est, a Latin phrase meaning “that is.”
kV	kilovolt
LEPC	Local Emergency Planning Committees
LLC	Limited Liability Corporation
LOTO	Lock Out / Tag Out
mil	1/1000 th of an inch
Mohawk	Mohawk Solar, LLC
MSDS	Material Safety Data Sheets
MW	megawatt
MWh	megawatt-hour
NEC	National Electrical Code
National Grid	Niagara Mohawk Power Corporation
NYS	New York State
O&M	operations and maintenance
Owner	Mohawk Solar, LLC.
Plan	Spill Prevention, Control, and Countermeasure Plan

POI	Point of Interconnection
PPE	personal protective equipment
Project	Mohawk Solar Project
PV	photovoltaic
PVC	polyvinyl chloride
RCRA	Resource Conservation and Recovery Act
RQ	reportable quantity
SARA	Superfund Amendments and Reauthorization Act
SDS	Safety Data Sheets
Study Area	6,600 acre area being evaluated to host the Project
SPCC	Spill Prevention, Control, and Countermeasure
TBD	To be determined
USDOT	United States Department of Transportation
UST	Underground Storage Tank

Certification of Substantial Harm Determination

Facility Name: _____

Address: _____

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 _____

2. Does the facility have a total oil storage capacity greater than or equal to one million (1,000,000) 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 _____

3. Does the facility have a total oil storage capacity greater than or equal to one million (1,000,000) gallons and is located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

YES _____ NO _____

4. Does the facility have a total oil storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR Part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake.

YES _____ NO _____

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

YES _____ NO _____

Certification

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

(Signature)

(Title)

(Please Print or Type Name)

(Date)

Part I. Spill Prevention, Control, and Countermeasure Plan General Requirements – 40 CFR 112.7

1.0 CERTIFICATION OF PROFESSIONAL ENGINEER (40 CFR 112.3 (D))

I hereby certify the following, pursuant to 40 CFR 112.3(d)(1):

- I am familiar with the requirements of this part;
- I or my agent have visited the Mohawk Solar LLC, a Delaware limited liability company – Mohawk Solar Facility;
- This SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part;
- Procedures for inspections and testing have been established; and
- This SPCC Plan is adequate for Mohawk Solar LLC, a Delaware limited liability company – Mohawk Solar Facility.

Name of Registered Professional Engineer: _____

Registration Number: _____

Signature: _____

Date: _____

AFFIX SEAL

2.0 MANAGEMENT APPROVAL AND COMMITMENT (40 CFR 112.7(K)(2)(II)(B))

This Spill Prevention Control and Countermeasure (SPCC) Plan (Plan) has been prepared in accordance with the applicable portions of 40 CFR 112 and is intended to establish the procedures, methods, equipment, and other requirements to prevent the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines from the Mohawk Solar LLC, a Delaware limited liability company – Mohawk Solar Facility located within the Towns of Canajoharie and Minden, Montgomery County, New York. This Plan is intended to fulfill the spill control requirements of applicable federal and state regulations.

This SPCC Plan has the full approval of management with authority to commit the necessary resources to fully implement the SPCC Plan, including the Oil Contingency Plan per 40 CFR Part 109. All personnel with responsibilities covered by this plan will be expected to become familiar and act in accordance with its provisions.

It is the intention of management of the site to conduct our operations in accordance with the Plan presented herein. Full approval and authority is extended by the undersigned to commit the necessary resources to implement this Plan.

(Signature)

(Please Print Name)

(Title)

3.0 PLAN REVIEW AND AMENDMENT (40 CFR 112.5(A-B))

In accordance with 40 CFR 112.5(a), this SPCC Plan will be revised whenever there is a change in the site design, construction, operation and/or maintenance that materially affects The Mohawk Solar Project’s potential for a discharge of oils to navigable waters or adjoining shorelines. Examples of changes that may require amendment of the SPCC Plan include but are not limited to: the installation or removal of electrical transformers or other oil storage; modifications to secondary containment methods; or the revision of standard operations and maintenance procedures.

In accordance with 40 CFR 112.5(b), a review of the SPCC Plan is completed at least once every five years to ensure its protectiveness and effectiveness. Documentation of reviews both periodically and operationally is documented herein. This Plan will also be revised in the event this Plan fails in an emergency situation. Such revisions will be fully implemented as soon as possible, but not later than six (6) months after such change occurs.

Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility’s potential for the discharge of oil as defined in 40 CFR 112.1(b) from the facility. Any amendment must be implemented as soon as possible, but not later than six months following the preparation of any amendment.

Any revisions to this Plan will be reviewed and certified by a Registered Professional Engineer pursuant to the following: “I have completed a review and evaluation of this SPCC Plan for the Mohawk Solar LLC, a Delaware limited liability company – Mohawk Solar Facility the date noted. The SPCC Plan will or will not be amended as indicated below.”

All revisions to this SPCC Plan will be documented in this section.

Date of Review	Name and Title of Reviewer	Signature of Reviewer	Will or Will Not Amend SPCC Plan
			<input type="checkbox"/> Will Amend <input type="checkbox"/> Will Not Amend
			<input type="checkbox"/> Will Amend <input type="checkbox"/> Will Not Amend
			<input type="checkbox"/> Will Amend <input type="checkbox"/> Will Not Amend
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			<input type="checkbox"/> Will Amend <input type="checkbox"/> Will Not Amend
			<input type="checkbox"/> Will Amend <input type="checkbox"/> Will Not Amend
			<input type="checkbox"/> Will Amend <input type="checkbox"/> Will Not Amend

4.0 INTRODUCTION & PLAN ORGANIZATION

This Spill Prevention, Control and Countermeasures Plan (Plan) describes the procedures, methods, and equipment used at the Mohawk Solar (Owner) Project Site to prevent the discharge of oil into or upon navigable waters of the United States or adjoining shorelines or to any other location that may affect other natural water resources of the United States from the Mohawk Solar Project (Project). Along with describing the counter measures used within the Project, the Plan establishes inspection, reporting training, and recordkeeping requirements for the aboveground oil storage.

This Plan is organized to follow the requirements of 40 CFR §112.7.

5.0 CONFORMANCE WITH 40 CFR PART 112 (§112.7(A)(1)-(2))

This Project will conform to the requirements of 40 CFR Part 112. All oil-filled electrical equipment will have sufficient secondary containment. Inspection, operation and maintenance, training and spill response procedures and other requirements of the 40 CFR Part 112 are described in this document.

6.0 LOCATION OF PLAN AND AVAILABILITY FOR REVIEW (40 CFR 112.3(E)(1 AND 2))

A copy of this SPCC Plan will be maintained at the facility and will be made available to the USEPA Regional Administrator for on-site review during normal working hours.

7.0 GENERAL INFORMATION (40 CFR 112.7(A))

7.1 Facility Name and Ownership

Facility Name: Mohawk Solar Facility located within the Towns of Canajoharie and Minden, Montgomery County, New York

Facility Owner: Mohawk Solar LLC, a Delaware limited liability of 1125 NW Couch, Suite 700, Portland, OR 97209

Contact Personnel

Name	Title	Contact Information
TBD	TBD	TBD

7.2 Facility Description (40 CFR 112.7(a)(3))

Mohawk Solar is a proposed 90 megawatt (MW) photovoltaic (PV) solar energy generating project located within the Towns of Canajoharie and Minden, Montgomery County, New York. Mohawk Solar will have a nameplate capacity of 90 MW and is expected to generate approximately 185,000 MWh of energy for year one of operation. The Project will represent the largest utility-scale solar power plant in New York State.

The proposed Project consists of the construction and operation of a commercial-scale solar power project, including:

- A solar field of PV panels producing direct current (DC) electricity mounted on a single-axis tracking structures that will follow the sun throughout the day;

- Inverters placed throughout the Project (internal to the panel arrays) to convert DC electricity to alternating current (AC) electricity.
- A medium voltage collection system that will aggregate the AC output from the inverters;
- A substation where the Project's electrical output voltage will be combined, and its voltage increased to the transmission line voltage of 115 kV via a step-up transformer;
- A generation tie line (gen-tie) that will connect the Project to the designated point of interconnection (POI);
- A switching station to be specified by the Owner, where the electricity will be injected into the existing bulk transmission system and delivered to homes and businesses;

Refer to the Appendix A for the SPCC Plan Site Plan (TBD) drawing for the locations and details pertaining to the bulk storage containers that are regulated under this Plan. Additional information about these containers is presented in the following sections.

7.3 Bulk Storage Containers (40 CFR 112.7(a)(3)(i))

It is not anticipated that any bulk storage containers of oil will be present on site. Oil-filled equipment, such as an electrical transformer, is not considered a bulk storage container pursuant to 40 CFR 112.

7.4 Discharge Prevention Measures (40 CFR 112.7(a)(3)(ii))

It is not anticipated that there will be any regular storage of oil on site during normal operations. However, in the event of temporary storage, the Owner will take the following precautions to verify that a release of oil and hazardous substances is prevented or contained:

7.4.1 Containers

1. All containers 55-gallons or greater will be stored on pallets or indoors and surrounded with secondary containment.
2. Secondary containment will include but will not be limited to:
 - a. temporary earthen berms with polyethylene underlining the entire contained area with a minimum of 10-mil thickness or a portable containment system constructed of steel, PVC or other suitable material.
 - b. Concrete tub type secondary containment structures
3. Containment areas will be capable of containing 110 percent of the volume of the largest container in the area.
4. All container storage areas will be inspected daily for leaks and deterioration.
5. Leaking and/or deteriorated containers will be replaced as soon as the condition is first detected, and cleanup measures must be implemented to remediate all contamination.
6. No incompatible materials will be stored in the same containment area.
7. No storage area will be unattended for periods longer than three days.

7.4.2 Tanks

1. The Owner will operate only those tanks for fuel and material storage which meet the requirements and regulations specified in the contract agreement and will be surrounded with secondary containment.
2. Self-supporting tanks will be constructed of carbon steel or other materials compatible with the contents of each tank.

3. All tanks will be elevated a minimum of two feet above grade and inspected daily for leaks and/or deterioration.
4. Vehicle mounted tanks will be equipped with flame/spark arrestors on vents to verify that self-ignition does not occur.
5. Tanks will not be used to store incompatible materials in sequence unless first thoroughly decontaminated.
6. Any tank utilized for storing different products between construction locations will be thoroughly decontaminated prior to refilling.
7. Tanks will be inspected daily for leaks and damage by the EI.

7.4.3 Loading/Unloading Areas

1. The area beneath loading/unloading locations will be inspected by the Owner for spills before and after each use. Corrective measures will be implemented if spills occur.
2. Transferring of liquids and refueling will only occur in pre-designated locations at least 100 ft from all waterbodies and 200 ft from any water well. Where conditions require that construction equipment (e.g., trench dewatering pumps or hydrostatic test water pumps) be refueled within 100 ft of waterbodies or wetlands, these operations must be manned continuously to verify that over filling, leaks or spills do not occur. Where stationary equipment must remain within 100 ft of a waterbody or wetland, adequate secondary containment must be provided.
3. All pre-designated areas where transferring of liquid and refueling take place must be equipped with an emergency response kit. At a minimum this kit must include:
 - a. 10, 48" x 3" oil socks,
 - b. five, 17" x 17" oil pillows,
 - c. one, 10' x 4" oil boom,
 - d. 20, 24" x 24" oil mats,
 - e. garden size, 6 mil, polyethylene bags,
 - f. 10 pair liquid proof gloves compatible with materials on site, and
 - g. one, 55-gallon polyethylene open-head drum.
4. Service vehicles used to transport lubricants and fuel must be equipped with a smaller chemical response kit which contains:
 - a. one bag of loose chemical pulp,
 - b. two to three, 17" x 17" chemical pillows,
 - c. two, 48" x 3" chemical socks,
 - d. five, 18" x 18" adsorbent mats,
 - e. garden size, 6 mil, polyethylene bags,
 - f. 10 pair liquid proof gloves compatible with materials on site,
 - g. one, 30-gallon polyethylene open-head drum, and
 - h. hazardous waste labels.
5. Each refueling vehicle will have a sufficient number of shovels, brooms, 10-mil polyethylene sheeting, and fire protection equipment to contain a moderate oil/fuel spill.

7.4.4 Inspection

1. EI will perform daily inspection of secondary containment for generators used for dewatering.
2. EI will perform weekly inspections of container storage areas.
3. EI will perform regular inspection of on-site equipment for leaks and proper secondary containment.
4. EI will monitor any refueling operations taking place within a wetland or waterbody.

7.5 Discharge or Drainage Controls (40 CFR 112.7(a)(3)(iii))

This facility will not house any bulk storage containers. Discharge prevention measures associated with this site's oil-filled equipment (i.e. transformers) are described in Section 10.0.

Additional discharge and drainage control measures are discussed in Part II Section 2.0.

7.6 Counter Measures (40 CFR 112.7(a)(3)(iv))

The following subsections describe the procedures to be followed when discovering a release:

7.6.1 Discharge Discovery

The person discovering the release from a tank, drums, or from oil-filled equipment should initiate the following immediately:

- 1. Extinguish any sources of ignition.** Until the material is identified as nonflammable and noncombustible, all potential sources of ignition in the area should be removed. Vehicles should be turned off. If the ignition source is stationary, attempt to move spilled material away from ignition source. Avoid sparks and movement creating static electricity.
- 2. Attempt to stop the release at its source.** Assure that no danger to human health exists first. Simple procedures (turning valves, plugging leaks, placement of absorbent booms, etc.) may be attempted by the discoverer if there is no health or safety hazard and there is a reasonable certainty of the origin of the leak. All other efforts to control leaks should be under the supervision of the SPCC Coordinator or Assistant SPCC Coordinator.
- 3. Initiate spill notification and reporting procedures.** Report the incident immediately to the SPCC Coordinator or Assistant SPCC Coordinator. If there is an immediate threat to human life (e.g. a fire in progress or fumes overcoming workers), an immediate announcement should be made to evacuate the nearby area (or nearby buildings), and the fire department should be contacted. Request the assistance of the fire department's hazardous materials response team or from Mohawk Solar LLC's spill cleanup contractor if an uncontrollable spill has occurred and/or if the spill has migrated beyond the facility's boundaries. The SPCC Coordinator will perform any necessary corporate and external regulatory notification. Refer to Section 7.8 for a list of emergency contacts.

7.6.2 Discharge Response

If material is released outside the containment areas, it is critical that the material is accurately identified, and appropriate control measures are taken in the safest possible manner. Consult the on-site safety data sheets (SDS), as appropriate. SDSs are available inside the office/administration area. To contain a release, the following procedure should be followed.

- 1. Attempt to stop the release at the source.** If the source of the release has not been found; if special protective equipment is necessary to approach the release area; or if assistance is required to stop the release, the fire department or cleanup contractor should be contacted to aid in halting the discharge at its source. Site personnel should be available to guide assistance from other parties.
- 2. Contain the material released into the environment.** Following proper safety procedures, the spill should be contained through the use of absorbent materials, spill kits, hand tools/mops/brooms, etc. Spill kits that include absorbent material, containment socks, rags, plastic, etc. are staged in various locations across the facility. Consult applicable SDSs for material compatibility, safety, and environmental precautions.
- 3. Continue the notification procedure.** Inform the SPCC Coordinator of the release (the Coordinator shall perform immediate notification as appropriate). Obtain outside contractors to clean up the spill, if necessary.

7.6.3 Discharge Cleanup Procedures

Appropriate personal protective equipment and cleanup procedures can be found on SDSs. Care must be taken when cleaning up spills to minimize the generation of waste. The Assistant SPCC Coordinator, other site/trained personnel, the Area Environmental Manager or his/her designee are available to assist the SPCC Coordinator.

1. **Recover or cleanup the material spilled** - As much material as possible should be recovered and reused where appropriate. Material that cannot be reused must be declared waste. Liquids absorbed by solid materials shall be shoveled into open top, 55-gallon drums; or if the size of the spill warrants, into a roll-off container(s). When drums are filled after a cleanup, the drum lids shall be secured, and the drums shall be appropriately labeled (or relabeled) identifying the substance(s), the date of the spill/cleanup, and the facility name and location. Combining non-compatible materials can cause potentially dangerous chemical and/or physical reactions or may severely limit disposal options. Compatibility information can be found on SDSs.
2. **Cleanup of the spill area** - Surfaces that are contaminated by the release shall be cleaned via an environmentally friendly degreaser or similar product. Cleanup water must be minimized, contained and properly disposed. Occasionally, porous materials (such as wood, soil, or oil-dry) may be contaminated. Such materials will require special handling for disposal.
3. **Decontaminate tools and equipment used in cleanup and replenish spill kits** - Even if dedicated to cleanup efforts, tools and equipment that have been used must be decontaminated before replacing them in the spill control kit. Spill kits shall be inventoried and replenished with supplies following a cleanup event.

7.7 Disposal Plan (40 CFR 112.7(a)(3)(v))

Following a release, the SPCC Coordinator or Assistant SPCC Coordinator will ensure that all recovered waste, contaminated absorbents, and impacted media (e.g. impacted soil) are collected and disposed of in accordance with federal and state requirements. Recovered contaminated material will be disposed of at an approved treatment, storage, and disposal facility. The SPCC Coordinator or Assistant SPCC Coordinator will also ensure that all spill response equipment is cleaned and replenished as necessary.

7.8 Contact List (40 CFR 112.7(a)(3)(vi))

FACILITY CONTACT INFORMATION

Name	Title	Contact Information
TBD	TBD	
SPCC Coordinator		
TBD	TBD	
Assistant SPCC Coordinator		
TBD	TBD	
Designated Discharge Prevention Person		

EMERGENCY RESPONSE CONTRACTORS

Name	Contact Information
TBD	
TBD	
TBD	

REGULATORY AGENCY CONTACT INFORMATION

Name	Contact Information
Montgomery County Emergency Management	518.853.4011 518.853.5500 (after hours emergency)
Canajoharie Fire Department	911 or 508.673.3812
New York State Spill Hotline	800.457.7362

FACILITY CONTACT INFORMATION

Environmental Protection Agency Region #2	877.251.4575
National Response Center (US Coast Guard)	800.424.8802 202.267.2675

8.0 NOTIFICATION REQUIREMENTS (40 CFR 112.7(A)(4))

8.1 General Spill Documentation and Reporting

At the conclusion of a discharge, a spill documentation form will be completed and kept on file. An Example Spill Reporting Form is provided in Appendix B. At a minimum, the following items will be included in the report:

1. The exact address or location and telephone number of the facility;
2. The date and time of the discharge;
3. The type of material discharged;
4. Estimates of the total quantity discharged;
5. Estimates of the quantity discharged that affects public health or the environment;
6. The source of the discharge;
7. A description of all affected media;
8. The cause of the discharge;
9. Any damages or injuries caused by the discharge;
10. Actions being used to stop, remove, and mitigate the effects of the discharge;
11. Whether an evacuation may be needed; and
12. The names of individuals and/or organizations that have also been contacted.

Oil spills and hazardous substance releases in excess of the RQ are to be immediately reported to the Mohawk Environmental Representative. All spills over one gallon must be reported internally.

A Spill Report Form (Attachment C) will also be completed and forwarded to the Mohawk Environmental Representative as soon as technically feasible. The Mohawk Environmental Representative will determine if the release constitutes a:

1. RQ under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA),
2. Reportable release under the Clean Water Act or Resource Conservation and Recovery Act (RCRA),
or
3. Reportable Threshold Quantity under Superfund Amendments and Reauthorization Act (SARA) Title III, local, and state requirements.

8.2 New York State Reporting Requirements

An oil spill must be reported to the New York State (NYS) Spill Hotline at 1-800-457-7358 **within 2 hours of discovery**, unless the spill meets all of the following criteria:

1. The quantity is known to be less than 5 gallons; and
2. The spill is contained and under control of the spiller; and
3. The spill has not and will not reach the State's water or any land; and
4. The spill is cleaned up within 2 hours of discovery

Note that a spill is considered to not have impacted land if it occurs on a paved surface such as asphalt or concrete; however, a spill onto a dirt or gravel parking lot is considered to have impacted land and is reportable.

8.3 U.S. Environmental Protection Agency (EPA) Reporting Requirements

In the event of a discharge meeting the following criteria, submit a spill log and reporting form additional documentation as necessary to the EPA Regional Administrator and the NYSDEC within 60 days of the following:

1. A single discharge of more than 1,000 gallons of oil into or upon navigable waters or adjoining shorelines; or
2. Two discharges, each more than 42 gallons of oil, to navigable waters or adjoining shorelines occurring within any twelve-month period.

The report must include the following information:

- Name of the Project;
- Name(s) of the owner/operator of the Project;
- Name of the person reporting the discharge(s);
- Location of the Project;
- Maximum storage of handling capacity of the Project and normal daily throughput;
- The corrective actions and/or countermeasures taken, including a description of the equipment, repairs and/or replacements;
- An adequate description of the Project, including maps, flow diagrams, and topographical maps, as necessary;
- The Cause(s) of the reportable discharge, including a failure analysis of system or subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Other information as the EPA Regional Administrator may reasonably require pertinent to the Plan or spill.

9.0 FAILURE ANALYSIS (40 CFR 112.7(A)(5)(B))

It is expected that a major failure of or damage to a pad mounted transformer could result in the instantaneous release of the full volume of oil stored. Typically, a minor failure or damage to a transformer could result in a slow leak with a possible discharge rate of 10 gallons/hour with a maximum estimated discharge of 20 gallons.

It is expected that a major failure of or damage to a substation transformer could result in the instantaneous release of the full volume of oil stored. Typically, a minor failure or damage to a transformer could result in a slow leak with a possible discharge rate of 100 gallons/hour with a maximum estimated discharge of 200 gallons. It is expected that any discharge from the substation transformer would be contained in the secondary containment vault.

All oil-filled equipment will be located within secondary containment designed to hold greater than 110% of the oil capacity of the equipment, so the probability of a release is minimal.

10.0 CONTAINMENT AND DIVERSIONARY STRUCTURES (40 CFR 112.7(C))

The main function of containment and diversionary structures is to limit the spread of a spill prior to cleanup. The containment system must be capable of containing oil so that any discharge from the primary containment system will not escape the containment system before cleanup occurs. As noted in 40 CFR 112.7(c), secondary containment may be either active or passive in design.

The equipment listed in the in the Equipment Inventory Table uses mineral oil, which may constitute a risk to navigable waters of the United States.

OIL-FILLED EQUIPMENT TABLE

ID	Storage Capacity (gal)	Contents	Location Description
Collector Substation Main Transformer	14,000 gallons	Mineral Oil	This transformer will be situated within a concrete-tub secondary containment
Collector Substation Instrument Transformers (3)	40 (each) = 120 gallons	Mineral Oil	Geomembrane-type secondary containment
Interconnection Substation Instrument Transformers (12)	40 (Each)	Mineral Oil	Geomembrane-type secondary containment

Containment structures for the 14,000-gallon main transformer and the 40-gallon instrument transformers are described in the following sections.

10.1 Collector Station Main Transformer (14,000-gallon Capacity)

The Main Transformer located at the collector station will have an oil-carrying capacity of 14,000-gallons. This transformer will be located within a concrete tub-type secondary containment structure designed to hold greater than 110% (15,400-gallons) of the oil capacity of the main transformer.

10.2 Instrument Transformers (40-gallon Capacity)

The Collector Station will house 3 instrument transformers with 40-gallons capacity each, and the Interconnection Station will house 12 instrument transformers with 40-gallons capacity each. These transformers will be housed within a geomembrane-type secondary containment. Geomembrane can be used to detect post-installation damage and as part of a periodic maintenance program. Geomembrane Liner and Oil Filtration Panel Containment Systems for hydrocarbon filtration in sandy or undetermined subsoils allows storm water to flow through the Oil Filtration Panel side walls while removing hydrocarbons. In the event of a large spill, the side walls completely solidify and contain the hydrocarbon, keeping it from escaping.

10.3 Impracticability Determination (40 CFR 112.7(d))

A written explanation of impracticability to install secondary containment structures or equipment is not applicable because of the descriptions provided in Sections 10.1 & 10.2.

11.0 INSPECTIONS, TESTS, AND RECORDS (40 CFR 112.7(E))

11.1 Monthly and Annual Inspections (40 CFR 112.7(e))

Project personnel will continuously monitor the oil-filled equipment. Typically, a weekly inspection of secondary containment areas will be completed, and regular inspections of onsite equipment for leaks will be completed. During visual inspections, the base of each transformer will be inspected for security and signs of damage. If an oil leak had reached the ground it would be identified at this time.

11.2 Transformer Oil Testing (40 CFR 112.7(e))

Visual inspections of transformers will be complete in accordance with written procedures at a schedule TBD. Transformer oils will be tested regularly, and records of inspections and tests will be signed by the appropriate supervisor or inspector. These records will be retained with this SPCC for no less than 3 years.

11.3 Records (40 CFR 112.7(e))

Written or electronic records of inspections will be maintained onsite for a minimum period of three years.

12.0 PERSONNEL TRAINING AND DISCHARGE PREVENTION BRIEFINGS (40 CFR 112.7(F))

Pursuant to corporate policies, Mohawk Solar, LLC conducts and documents training for its operational and oil-handling personnel. The training encompasses spill prevention and response in conjunction with stormwater pollution prevention. The training, in general, touches on various topics associated with spill prevention to include but not limited to the following (and as required under 40 CFR 112.7(f)):

1. Operation and maintenance of equipment to prevent discharges;
2. Discharge procedure protocols and emergency response procedures;
3. Applicable pollution control laws, rules, and regulations;
4. General facility operations;
5. Contents of this SPCC Plan;
6. Additional training topics may include the following:
7. Spill detection and employee awareness;
8. Spill control, containment, and countermeasures;
9. Product storage, handling, and transfer procedures;
10. Facility (i.e. building) drainage system;
11. Internal and external communication;
12. Use and maintenance of spill response equipment;
13. Building security to prevent vandalism to bulk storage units.

Employees that are involved with performing tasks related to the diesel fuel tank and other petroleum storage units that are covered under this Plan (e.g. periodic inspections, etc.) will receive participate in the annual training. The focus of the training will include, at minimum, the importance of spill prevention, spill prevention methods, and spill response. In addition, periodic training may occur if new equipment is installed that requires a change in this Plan or for orientation of newly assigned employees. All training units will be documented, and the documentation will be kept in a binder with the Operations Manager or a designee.

The Designated Discharge Prevention Individual for Mohawk Solar, LLC. will be detailed in the Facility Contact List Table in Section 7.8.

13.0 SECURITY (40 CFR 112.7(G))

The Mohawk Solar Facility is fenced, has locking gates that block the site entrances during off-work hours, and has controlled access via of a visitor sign-in policy. The facility will adhere to NEC codes for electric generation facilities. Facility will be accessed by Mohawk personnel only. Mohawk will work with local emergency responders on procedures to gain access to site.

14.0 TANK TRUCK LOADING/UNLOADING RACKS (40 CFR 112.7(H))

The subject facility is not equipped with tank truck loading/unloading racks.

15.0 FIELD-CONSTRUCTED ABOVEGROUND CONTAINERS (40 CFR 112.7(I))

This section is not applicable as there are no field-constructed ASTs on site.

16.0 COMPLIANCE WITH STATE REGULATIONS (40 CFR 112.7(J))

The Project meets the definition of a facility as defined by 6 NYCRR Part 613 and will be in compliance with AST regulations outlined in 6 NYCRR 613-4, and in particular the requirements for secondary containment outlined in 6 NYCRR 613-4.1(v).

17.0 QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT (40 CFR 112.7(K))

The subject facility has sixteen (16) pieces of oil-filled operational equipment; one (1) 14,000-gallon capacity main transformer and fifteen (15) 40-gallon capacity instrument transformers, all of which are used in the electrical generation operations. This equipment has adequate secondary containment as described previously in this document.

OIL-FILLED EQUIPMENT TABLE

ID	Storage Capacity (gal)	Contents	Location Description
Collector Substation Main Transformer	14,000 gallons	Mineral Oil	This transformer will be situated within a concrete-tub secondary containment
Collector Substation Instrument Transformers (3)	40 (each) = 120 gallons	Mineral Oil	Geomembrane-type secondary containment
Interconnection Substation Instrument Transformers (12)	40 (Each)	Mineral Oil	Geomembrane-type secondary containment

Part II. Spill Prevention, Control, and Countermeasure Plan Requirements for Onshore Facilities (Excluding Production Facilities) – 40 CFR 112.8

1.0 GENERAL REQUIREMENTS 40 CFR 112.8(A)

The prior sections of this SPCC Plan demonstrated the subject facility's compliance with 40 CFR 112.7.

2.0 FACILITY DRAINAGE (40 CFR 112.8(B))

The drainage design of the Mohawk Solar facility is TBD. However, the oil-filled equipment onsite will be installed inside secondary containment structures designed to hold 110% of oil capacity. Secondary containment basins will be equipped with drainage geomembrane filters that allow the passage of water but not the passage of oil. Any physical dewatering of secondary containment basins will be completed through the use of manual pumps, and inspection of liquids to be dewatered will occur prior to pumping. No pumping of liquids with visible odor or sheen will be permitted. There are no diked storage areas (with or without valves) that capture and temporarily store stormwater that could potentially be impacted with oil.

Detailed descriptions and maps of facility draining will be provided at a future date.

3.0 BULK STORAGE CONTAINERS (40 CFR 112.8(C))

There are no bulk storage containers onsite at the Mohawk Facility. Per 40 CFR 112.2, oil-filled equipment is not considered bulk storage containers.

3.1 Construction of Bulk Storage Containers – 40 CFR 112.8(c)(1)

There are no bulk storage containers onsite at the Mohawk Facility. All oil-filled transformers were constructed specifically to contain the stored oils and, as such, the oil-filled equipment tanks are compatible with the petroleum products stored.

3.2 Secondary Containment – 40 CFR 112.8(c)(2)

There are no bulk storage containers onsite at the Mohawk Facility. All oil-filled transformers are equipped with secondary containment as described previously in this document.

3.3 Drainage from the Substation Transformer Containment Vaults– 40 CFR 112.8(c)(3)

It is common for drainage from the substation transformer containment vault to be controlled by an oil stop valve. In this scenario, the valve is automated to drain whenever water is present but will close to prevent drainage if oil is detected. This or its equivalent is expected to be employed by the Project.

3.4 Corrosion Protection – 40 CFR 112.8(c)(4 and 5)

There will be no underground storage tanks at the subject facility. Further, there are no partially buried or bunkered metallic tanks present. Therefore, the requirements for corrosion protection are not applicable.

3.5 Integrity Testing – 40 CFR 112.8(c)(6)

Inspections and tests are performed typically on a monthly frequency. The scope of monthly inspections of bulk storage is described in Part I Section 11.0, and a draft copy of the inspection checklists is in Appendix C. Checklists that align with the actual site-specific equipment will be developed in the future. Inspections are documented using these checklists, and the inspecting official signs these records. Signed records are maintained at the facility for at least three years. Any oil encountered during the monthly inspections (or otherwise) is promptly removed/cleaned up, and all other issues arising from the inspection are promptly addressed.

Monthly visual inspections of the ASTs at the subject facility can be considered a suitable evaluation method based on information presented in 40 CFR 112.8(c)(6) which states the following: “Integrity testing may be as simple as an external visual inspection.” This provision, in conjunction with the type of each container and each container’s storage environment suggests that additional non-destructive integrity testing is not warranted.

If corrosion is noted on the exterior of any transformer, a certified inspector or qualified professional will determine whether the transformer is acceptable for continued use. Such determination may be made through internal inspections or other method acceptable to the professional. The facility management will act based on the professional’s recommendation.

3.6 Heating Coils – 40 CFR 112.8(c)(7)

The transformers on site are not equipment with internal heating coils. Therefore, the requirements of this section are not applicable.

3.7 Overfill Prevention Measures – 40 CFR 112.8(c)(8)

Not applicable at this time. Oil-filled equipment is expected to arrive on site full and will not receive additional oil (i.e. not subject to filling events). As such, there is currently no potential for overfilling that is typical of conventional tanks.

3.8 Effluent Treatment Facilities – 40 CFR 112.8(c)(9)

No effluent treatment facilities are present at the subject facility. Therefore, the requirements of this section do not apply.

3.9 Visible Discharge Correction Measures – 40 CFR 112.8(c)(10)

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, rivets, and bolts – are corrected as soon as possible following discovery. Oil is promptly removed from containment areas and disposed of according to the waste disposal method described in previous sections of this document.

3.10 Mobile or Portable Oil-Storage Containers – 40 CFR 112.8(c)(11)

There will not be any mobile or portable oil-storage containers on site at the Mohawk Facility. Therefore, the requirements of this section do not apply.

4.0 FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS (40 CFR 112.8(D))

None of the bulk storage containers nor the oil-filled equipment have any appurtenant buried piping or aboveground piping/valves that could potentially be damaged by vehicles traversing the site.

APPENDIX A

Project Mapping

(Detailed mapping to be provided following project construction)

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APPENDIX B

Inspection Checklists

DRAFT

Preliminary Electrical Substation Inspection Checklist – Mohawk Solar Project

Inspection performed by:

Component	Status		Comments
	Yes	No	

Yard

Is the substation fencing in good repair (no holes in fence / excavations under fence)?			
Are all gate locks secured and in good working order?			
Are all grounding mats covered (i.e. no wire protruding)?			
Yard lighting function properly (no lights out)?			
Are ladders inspected and stored properly (40' Extension & 4' Step)?			
Is there any unused equipment or material stored in the yard?			
Is there any garbage / refuse etc. on the ground?			
Are there clear warning / hazard signs posted in appropriate places?			

Yard (bus, switches and transformers)

Are all switches and cabinets in good repair, secure and locked/tagged where appropriate?			
Are all equipment labels legible and in good repair (e.g. switches, OCBs)?			
Does an overhead visual check of the substation bus reveal any problems (broken insulators, cracked lightning arrestors, loose hardware, etc.)?			
Are there any oil leaks visible from the transformers or metering tanks?			
Does a visual inspection of the transformers reveal any problems?			
Do the radiator cooling fans spin freely?			
Are all gauges reading within range?			
Main Transformer: (Record Highest and Reset) Oil Temp.: Winding Temp.:			

Building

Is the metal clad building in good repair, no visible damage to building (leaks, holes, tears)?			
Is the metal clad building entrance securely locked?			
Is the building exterior lighting function properly (no lights out)?			
Are there any issues within the building (lights out, hvac, communications)?			
Is the building in compliance with housekeeping standards?			

Safety Equipment

Are the grounding sticks and high voltage gloves in good repair and inspection?			
Are the Arc Flash suits in good repair and clean?			
Are the proper LOTO tags/locks and LOTO log available?			
Are the ground cables & high voltage detector in good repair and function?			
Is all safety equipment secured and stored properly?			
Are the First - aid kit, Fire Extinguisher's & Eye Wash station ready for use and inspected?			

Critical Equipment

Are any alarms showing on the transformer (i.e. gas)?			
Have all history/fault logs been recorded?			
Are there any issues with the battery back - up system?			

Overall Assessment

Does the overall condition of the substation facilities and yard meet standards?			
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Signed:

Date:

APPENDIX C

Spill Log and Reporting Forms



Table 1: Preliminary Spill Log – Mohawk Solar Project

Date	Time	Logged by:	Source of Spill (Container / Equipment)	Quantity Removed	Method of Removal	Was Spill Reportable?	What Agencies was Spill Reported to?

Preliminary SPILL REPORT FORM – Mohawk Solar Facility

Spill Reported By:	Date:
Phone Number:	Time:
Project Managers:	
LOCATION: MOHAWK SOLAR FACILITY	
SPILL DESCRIPTION:	
Discharge/Discovery Date & Times:	
Material Spilled:	
Amount Spilled:	
Media Affected (Soil, Water, Other with specifics):	
Source of the Spill:	
CAUSE OF THE SPILL:	
DAMAGES or INJURIES (SPECIFY):	
RESPONSE ACTIONS TAKEN:	
OTHER ORGANIZATIONS AND INDIVIDUALS CONTACTED:	
<input type="checkbox"/> National Response Center Time:	
<input type="checkbox"/> Cleanup Contractor (Specify) & Time:	
<input type="checkbox"/> Facility Personnel (Specify) & Time:	
<input type="checkbox"/> NYS DEC Spill Hotline Time:	
<input type="checkbox"/> Other (Specify) & Time:	

APPENDIX D

Training Log

DRAFT

Preliminary Training Log – Mohawk Solar Project

Date of Training:

Description of Training:

Personnel Trained:

Name	Signature

APPENDIX E

Material Safety Data Sheets (MSDS)

(To be provided following project construction)



