

**Spill Prevention, Control,  
and Countermeasure Plan**



**Ohio Army National Guard  
Rickenbacker Army Enclave**

**Rickenbacker International Airport, Columbus, Ohio**

Prepared for:

Ohio Army National Guard  
Environmental Management Office

Prepared by:

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## Table of Contents

	<u>Page</u>
ENGINEER'S CERTIFICATION .....	iii
MANAGEMENT APPROVAL .....	iv
REVISION TRACKING FORM .....	v
40 CFR 112 CROSS REFERENCE TABLE .....	vi
1.0 INTRODUCTION.....	1-1
2.0 FACILITY DESCRIPTION .....	2-1
2.1 General Information .....	2-1
2.2 Containers Not Covered by this Plan .....	2-2
2.3 Navigable Waters.....	2-2
3.0 APPLICABILITY DETERMINATION .....	3-1
4.0 GENERAL PLAN REQUIREMENTS .....	4-1
4.1 Plan Review and Submittal .....	4-1
4.2 Conformance with Federal and Ohio Regulations.....	4-2
4.3 Personnel Training .....	4-2
4.4 Security .....	4-2
4.5 Recordkeeping .....	4-3
4.6 Spill History .....	4-3
4.7 Spill Response .....	4-3
4.8 Inspection and Testing .....	4-6
4.9 Mobile and Portable Container Policy .....	4-7
4.10 Rainwater Inspection in Diked Areas.....	4-10
4.11 Undiked Areas.....	4-10
4.12 New Construction .....	4-10
4.13 General Product Handling .....	4-10
5.0 CONTAINER AREAS .....	5-1
5.1 AASF (Building 918).....	5-2
5.2 Enclave Maintenance (Building 932) .....	5-7
5.3 Emergency Generator (Building 942) .....	5-9
5.4 Transformers.....	5-11
6.0 CORRECTIVE ACTION PLAN.....	6-1

- Appendix A SPCC Regulated Containers
- Appendix B Certification of the Applicability of the Substantial Harm Criteria
- Appendix C Discharge Report to US EPA Regional Administrator
- Appendix D Volume Calculations for Secondary Containment Dikes
- Appendix E Inspection Checklists
- Appendix F Immediate Actions
- Appendix G OHANG Spill Prevention, Control, and Countermeasure Plan  
Training Presentations

### **List of Figures**

Figure 5.1.1 Rickenbacker Army Enclave ..... 5-3

**ENGINEER'S CERTIFICATION**

I, Kevin R. Russell, attest by means of this certification:

- That I am familiar with the requirements of 40 CFR 112;
- That I have visited and examined the facility;
- That this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and the requirements of 40 CFR 112;
- That procedures for required inspections and testing have been established; and
- That this Plan is adequate for the facility.

*Kevin R. Russell*

\_\_\_\_\_  
Kevin R. Russell, PE

*29 Dec 2014*

\_\_\_\_\_  
Date

State of Maryland Professional Engineer  
Certificate No. 0028442

**MANAGEMENT APPROVAL**

This Spill Prevention, Control, and Countermeasure Plan for Rickenbacker Army Enclave has my full approval, and I am at a level of authority to commit the necessary resources to implement this plan.



**COL John P. Dernberger**  
USPFO for Ohio

9 Jan 15  
Date

This Spill Prevention, Control, and Countermeasure Plan for Rickenbacker Army Enclave has my full approval, and I am at a level of authority to implement this plan.



**CPT Steven Vicario**  
Environmental Supervisor

07 January 2015  
Date

**REVISION TRACKING FORM**

Date	Revision Number	Plan Section	Description
Jan 2015		ALL	Reformatted entirely and added sections required by compliance inspection

Note: Non-technical revisions, such as changes in contact information, do not require PE Certification.

In accordance with 40 CFR 112.5(b), this Plan shall be reviewed at least once every five years. If there are no changes to the Plan, the Environmental Management Office will certify the following statement:

“I have completed a review and evaluation of this SPCC Plan for Rickenbacker and will not amend the Plan as a result.”

Signed:

\_\_\_\_\_  
**Jason Remich, Environmental Management Office**

Date:

\_\_\_\_\_

## 40 CFR 112 CROSS REFERENCE TABLE

<b>Final SPCC Rule</b>	<b>Rule Requirement</b>	<b>Equivalent Section</b>
§ 112.3(d)	PE certification	Engineer's Certification
§ 112.3(e)(1,2)	Facility maintains copy of plan	1.0
§ 112.3(f)	Extension of time	6.0
§ 112.4	Submittal requirements to the EPA Region II administrator	4.1
§ 112.5(a)	Updating requirements	4.1
§ 112.5(b)	Plan reviewed at least once every five years	4.1
§ 112.7	Cross-reference table to the parts of the regulation	Cross Reference Table
§ 112.7	Facility management approval	Management Approval
§ 112.7(a)(1,2)	Conformance with the regulations, details on equivalent environmental protection	4.2, 4.8, 4.9, 5.9
§ 112.7(a)(3)(i)	Plot plan showing the location and contents of each container, exempted USTs, piping, and transfer station	Figure 5.1.1
§ 112.7(a)(3)(ii)	Discharge prevention and product handling	4.13, 5.x.2*
§ 112.7(a)(3)(iii)	Discharge controls and secondary containment	4.7, 5.x.3*
§ 112.7(a)(3)(iv-vi)	Discharge countermeasures, disposal, and notification	4.7
§ 112.7(b)	Prediction of potential discharge (direction, rate of flow, amount)	Figure 5.1.1, 5.x.5*
§ 112.7(c)	Secondary containment	4.11, 5.x.3*
§ 112.7(d)	Contingency planning	4.7, 5.9
§ 112.7(e)	Inspections, tests, and records	4.5, 4.8, 4.9, 5.x.4*

\*Note that "5.x" indicates a subsection in each Container Area described under Section 5 of the Plan.

## 40 CFR 112 CROSS REFERENCE TABLE (Continued)

Final SPCC Rule	Rule Requirement	Equivalent Section
§ 112.7(f)(1)	Personnel training program requirements	4.3
§ 112.7(f)(2)	Accountability for discharge prevention	1.0
§ 112.7(g)	Security	4.4
§ 112.7(h)	Loading/unloading	5.x.2*
§ 112.7(i)	Brittle fracture evaluation requirements	N/A
§ 112.7(j)	Conformance with State requirements	N/A
§ 112.7(k)	Qualified oil-filled operational equipment	5.9, 5.12
§ 112.8(b)	Facility drainage	2.3, Figure 5.1.1, 4.11
§ 112.8(c)(1)	Compatible bulk storage containers	2.1
§ 112.8(c)(2)	Bulk storage containers secondary containment	2.1, 5.x.3*
§ 112.8(c)(3)	Requirements for drainage of diked areas	4.10
§ 112.8(c)(4)	Cathodic protection for buried tanks	N/A
§ 112.8(c)(5)	Cathodic protection for partially buried tanks	N/A
§ 112.8(c)(6)	Inspections and integrity testing for aboveground containers	4.8, 4.9, 5.x.4*
§ 112.8(c)(7)	Monitor internal heating coils	N/A
§ 112.8(c)(8)	High level alarm requirements	5.x.2*
§ 112.8(c)(9)	Observe effluent treatment facilities	N/A
§ 112.8(c)(10)	Correct visible discharges	4.7
§ 112.8(c)(11)	Locate mobile containers in secondary containment	4.9
§ 112.8(d)	Facility transfer operations, pumping, and facility process	4.13, 4.8
§ 112.20(e)	Certification of Substantial Harm Criteria	3.0, Appendix B

\*Note that "5.x" indicates a subsection in each Container Area described under Section 5 of the Plan.



## 1.0 INTRODUCTION

The Oil Pollution Prevention regulations, administered under the authority of the United States Environmental Protection Agency (US EPA), require certain facilities to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan to reduce or eliminate oil discharges to navigable waters of the United States. SPCC Plans document regulated containers at a facility and the inspection, testing, and maintenance procedures for those containers. The SPCC Plan also contains information regarding emergency response actions.

This document is the SPCC Plan (or Plan) for the Rickenbacker Army Enclave, which is located at Rickenbacker International Airport in Columbus, Ohio. This Plan has been prepared in accordance with 40 CFR 112 as amended. This Plan includes references to industry standards that apply to containers at Rickenbacker, and has been certified by a Professional Engineer registered in the State of Maryland.

Section 2.0 describes the installation and the surrounding area. The applicability of the SPCC regulations is described in Section 3.0. Section 4.0 contains general information required to be in any approved SPCC Plan. Facility contacts and spill response procedures are located in Section 4.7. Section 5.0 describes individual container storage areas. Section 6.0 contains the schedule for implementing any required facility changes.

The SPCC Program Manager in the Environmental Office is responsible for maintaining this Plan and discharge prevention. The primary onsite personnel accountable for discharge prevention are:

- CW2 Paul Tumidolsky
- SGT James Yahn

A copy of this Plan is maintained onsite in the Environmental Office. The container areas in Section 5 also have copies of their respective sections.



## 2.0 FACILITY DESCRIPTION

### 2.1 General Information

Rickenbacker Army Enclave is located on the Rickenbacker International Airport, but is under a separate command and, therefore, has decided to create a separate SPCC Plan. Rickenbacker supports Ohio Army National Guard (OHANG) aviation units throughout the state including the 73<sup>rd</sup> Troop Command, which provides training, planning, and support. Higher level maintenance activities on rotary wing aircraft and ground handling equipment are performed at the Army Aviation Support Facility (AASF).

Rickenbacker is located in Franklin County, near Columbus, Ohio, at 39° 48' North latitude; 82° 57' West longitude. The area surrounding Rickenbacker largely consists of residential, light industrial, and natural areas.

The following SPCC-regulated oils are used on Rickenbacker:

- Diesel
- Engine Oil
- Hydraulic Oil
- Mineral Oil
- Used Oils and Sludges

These products are stored in a variety of containers including aboveground storage tanks (ASTs), electrical operating equipment, emergency generator day tanks, 55-gallon drums, and smaller containers. All containers that hold 55-gallons or more of SPCC-regulated oils are considered SPCC-regulated containers. Appendix A lists specific information for the SPCC regulated containers at Rickenbacker. All of the regulated containers are designed to be compatible with the materials stored and operate at ambient temperatures and pressures. Secondary containment structures are sufficiently impervious to the oils they are intended to contain. No containers use internal heating coils. Rickenbacker does not have underground storage tanks (USTs), a tank car or tank truck loading/unloading rack, pipeline, or any field-constructed tanks. Rickenbacker is not a RCRA large quantity generator and, therefore, does not require a RCRA contingency plan. Also, there are no polychlorinated biphenyl (PCB) oil storage containers or PCB-containing devices (transformers, ballasts, etc.) onsite.

## 2.2 Containers Not Covered By this Plan

Containers owned and operated by contractors temporarily working on Rickenbacker property are not covered by this Plan. Such containers may include fuel tanker trucks or ASTs temporarily brought onto Rickenbacker. Each contractor is responsible for determining SPCC applicability and developing a site-specific Plan if necessary. Although not included in the SPCC Plan, related spill response activities may still involve Rickenbacker personnel.

An oil/water (O/W) separator, located beneath the AASF, intercepts the discharges of the floor trench drains (which line the perimeter of the maintenance areas) and the catch basin west of the AASF prior to directing them to the storm sewer system. There are also two O/W separators connected to washracks, one north of AASF, the other at site maintenance Building 929. The O/W separators are slow flow, gravity separation chambers used for primary treatment of industrial wastewater to remove free oil, grease, and fuel. Treated effluent from the O/W separator beneath the building discharges to the storm drainage system while the effluent from the washrack O/W separators discharges to the sanitary sewer. The collected oil is periodically removed by a contractor. DPW personnel conduct periodic inspections and maintenance on the O/W separators to ensure proper operation. These O/W separators are not used as secondary containment, but are exclusively used for wastewater/storm water treatment and are excluded from regulation by 40 CFR 112.

Amendments to 40 CFR 112 (from 26 December 2006) exempt all “motive power” containers (such as vehicle gas tanks) from SPCC Plan requirements. DoD recommends that the containment methods listed under 40 CFR 112.7(c) be employed as much as practicable for vehicle gas tanks and other such tanks over the 55-gallon threshold. Spills from these types of sources can be addressed under the description of undiked areas. Rickenbacker operates equipment affected by this guidance including tactical vehicles, construction vehicles, and tractor-trailer trucks. (See Section 4.11 for more details regarding Undiked Areas).

## 2.3 Navigable Waters

Most of Rickenbacker’s drainage discharges to a drainage ditch northwest of the site. Storm water catch basins and surface drainage are directed towards this drainage ditch. This drainage ditch flows to the southwest and west eventually flowing into the Scioto River. See Figure 5.1.1 for details.

### 3.0 APPLICABILITY DETERMINATION

According to 40 CFR 112.1, Rickenbacker requires an SPCC Plan. The facility-wide aboveground oil storage capacity totals more than 1,320 gallons, and oil discharges could reach navigable waters.

AR 200-1, chapter 11, paragraph 11-4b(2) states, "Ensure that the SPCC Plan addresses secondary containment (or lack thereof) at oil and hazardous material storage facilities." This Plan includes hazardous materials storage sites.

40 CFR 112.20(e) requires that affected facilities determine their potential to cause substantial harm and file a Facility Response Plan with the EPA Regional Administrator, if necessary. As required by 40 CFR 112.20(e), the Certification of the Applicability of the Substantial Harm Criteria is included in Appendix B of this Plan. Rickenbacker has less than one million gallons of oil storage capacity, does not transfer oil over water to/from vessels and does not pose a threat of substantial harm to fish and wildlife, a sensitive environment, or a drinking water intake. Therefore, a Facility Response Plan is not required.



## 4.0 GENERAL PLAN REQUIREMENTS

### 4.1 Plan Review and Submittal

This Plan must be reviewed and evaluated at least once every five years. This Plan must be amended within six months of the review if more effective, field-proven prevention and control technologies that would significantly reduce the likelihood of a discharge are available at the time of the review. If there are any technical amendments to the Plan, then a Professional Engineer must recertify it. Technical amendments include physical modifications or changes in facility procedures. If all changes are non-technical (e.g., contact name, phone number, container identification number, etc.), environmental personnel can review the Plan and sign the revision tracking form on page v.

This Plan must also be updated whenever there is a change in the facility design, construction, operation, or maintenance that materially affects its discharge potential. These types of changes include, but are not limited to, 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; or revision of standard operation or maintenance procedures. Movement of containers within an area that does not increase either the likelihood or the potential severity of a discharge would not require an update to the Plan.

Required Plan amendments must be prepared within six months of the change in operation and implemented as soon as possible, but not later than six months following preparation of the amendment. The revisions page at the beginning of this Plan must be updated to include all technical and non-technical changes to the Plan.

A report must be submitted to the US EPA Regional Administrator only if Rickenbacker has:

- Discharged more than 1,000 gallons of oil in a single discharge or
- Discharged more than 42 gallons of oil in each of two discharges, occurring within any twelve-month period.

40 CFR 112.4(a) lists the information that must be submitted to the US EPA Regional Administrator no more than 60 days from the date of the discharge that required the submittal. This required information is also presented in Appendix C. The Regional Administrator may also require that the SPCC Plan be submitted for review.

## 4.2 Conformance with Federal and Ohio Regulations

The main purpose of this Plan is to comply with the requirements of 40 CFR 112. Ohio does not have spill requirements more stringent than the Federal requirements in regards to SPCC Plans. Ohio Administrative Code (OAC) Rule 3750 sets requirements for spill notification and follow-up reporting.

## 4.3 Personnel Training

As required by 40 CFR 112.7(f)(1 and 3), oil handling personnel are trained to prevent discharges. This training and annual spill prevention briefings include a review of this SPCC Plan, applicable pollution control laws, spill response procedures, inspection and recordkeeping requirements, and the spill history for Rickenbacker. Personnel also receive specific training in petroleum product handling procedures and equipment maintenance and operation. Rickenbacker personnel responsible for fuel transfers receive additional training commensurate with their specific job requirements. The additional training may include:

- Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (29 CFR 1910.120),
- OSHA Hazard Communication Standard (29 CFR 1910.1200),
- OSHA Process Safety Standard (29 CFR 1910.119),
- Resource Conservation and Recovery Act (RCRA) Personnel Training (40 CFR 265.16),
- RCRA Waste Handling / Emergency Procedures (40 CFR 262.34(d)), and
- Department of Transportation Hazardous Materials Training (49 CFR 172, Subpart H).

Records of additional training are maintained by individual units or activities.

## 4.4 Security

Rickenbacker is located within a fenced military installation. Access requires positive identification, and all vehicles are subject to random searches. This level of security helps ensure that oil storage areas are only accessed by authorized personnel. In addition, a contracted civilian security company conducts roving patrols throughout the installation. All pump starter controls on the HEMTTs are locked off when not in

use and are only accessible to authorized personnel. HEMTT fuel dispensers are disabled after operating hours. All container areas have adequate facility lighting.

#### **4.5 Recordkeeping**

Site personnel maintain regular inspection and test records in accordance with 40 CFR 112.7(e); these records are maintained for a minimum of three years. General inspection and testing procedures for containers are described in more detail in Sections 4.8 and 4.9. Exceptions to the general procedures are identified in individual container area descriptions in Section 5 of this Plan.

#### **4.6 Spill History**

The Rickenbacker spill history is maintained by the Environmental office with dates, quantities, and corrective actions for all spills during the last five years. Records of all spills over 5 gallons, whether they are a reportable quantity or not, are maintained in the spill log.

#### **4.7 Spill Response**

If a spill occurs, installation personnel follow the response, reporting, and cleanup procedures appropriate to the level of spill. Personnel will promptly correct and cleanup (using available absorbents or spill kits) any visible POL discharges less than 5 gallons which are still on an impervious surface. All POL spills of any size that contact the ground or surface water or any size spills of a hazardous material (even on impervious surfaces) are reported immediately. Table 4.1 indicates the response and reporting for various spills. Initial actions that should be taken in the case of a spill are in Appendix F and posted “emergency spill response procedures” in the AASF. Response to spills should be protective of human life and health, property, and the environment. Personnel discovering a spill should report it immediately and respond in accordance with their abilities, training, and equipment available. If response can be done safely, then effort should be made to stop the spread of the spill, particularly protecting drains and flowing water. Stopping the source of the spill and eliminating any possible sources of ignition are also vital. The Rickenbacker International Airport Fire Department is the primary spill responder and can be called on any phone at 911.

Spill reporting may include notifications to the National Response Center (NRC), the Ohio EPA, the Joint Operations Center (JOC), and OHANG Environmental. OAC Rule 3750 requires notification of the Ohio EPA within 30 minutes of spill discovery (to navigable waters or 25 gallons to ground). OHANG Environmental is responsible for all reporting to external agencies. The US EPA does not distinguish between types of oil,

and any spill that causes a sheen upon “navigable waters” or that violates applicable water quality standards must be reported to the NRC (40 CFR 110.6). This means that the NRC must be called if an oil spill reaches the Scioto River or its tributaries. The drainage ditch eventually combines with other waters to form a tributary.

**Table 4.1 Spill Response and Reporting Procedures**

<b>Spill Volume</b>	<b>Response</b>	<b>Reporting</b>
Hazardous Material Less than RQ	Fire Department	OHANG Environmental
Hazardous Material Greater than RQ	Fire Department	NRC, Ohio EPA, JOC, OHANG Environmental
Any amount of POL that reaches a navigable water	Fire Department	NRC, Ohio EPA, JOC, OHANG Environmental
25 gallons or more of POL in a single event	Fire Department	NRC, Ohio EPA, JOC, OHANG Environmental

**Table 4.2 Spill Reporting Agencies**

<b>Agency</b>	<b>Phone</b>
National Response Center	800-424-8802
Ohio EPA	800-282-9378
Rickenbacker International Airport Fire Department	911
JOC	888-637-9053
OHANG Environmental	Work: 614-336-7095 or 614-336-7079 Cell: 614-557-2802
Response Coordinator (CW2 Paul Tumidolsky)	Office: 614-336-6372 Cell: 513-227-3634
Response Coordinator (SGT James Yahn)	Work: 614-336-6425 Cell: 614-451-4159

The information in Table 4.3 should be reported after a spill. Spill response equipment (absorbents, barriers, and personal protective equipment) is maintained in the AASF maintenance, POL, and storage areas, and HAZMAT storage units. The Rickenbacker Airport Fire Department will respond to spills, but will concentrate on containment. Cleanup will start after the Fire Department determines that public safety has been protected. Spill cleanup will be completed by onsite personnel on a small scale and OHANG Environmental with aid from contractors on a larger scale.

Recovered oils are managed through existing disposal contracts as used oil, or hazardous waste if contaminated. The City of Columbus or Franklin County Fire Departments can be called to assist with complex or burning spills via mutual aid agreements.

**Table 4.3 Spill Incident Report Form**

**SPILL INCIDENT REPORT FORM**

For use of this form, see AGOR 200-1; the proponent agency is AGOH-QM-IM-FS-ENV

Unit: \_\_\_\_\_ State: \_\_\_\_\_ Report Date & Time: \_\_\_\_\_

On-Scene Coordinator (OSC Name & Grade): \_\_\_\_\_ Phone: \_\_\_\_\_

Spill Location (Grid or Common Name): \_\_\_\_\_

What was Spilled (Mogas, Diesel, JP8, Other)? \_\_\_\_\_

If Other, Please Specify: \_\_\_\_\_

How Much was Spilled (Gallons)? \_\_\_\_\_

When Did the Spill Occur (Date & Time)? \_\_\_\_\_

How did the Spill Occur? \_\_\_\_\_

\_\_\_\_\_

What Remedial Action was Taken? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Were there any Injuries (Cause & Number)? \_\_\_\_\_

How Much Soil was Removed (Yards, Barrels, Trash Bags, etc.)? \_\_\_\_\_

Where was the Soil Stockpiled (Grid or Common Name)? \_\_\_\_\_

Was the Environmental Office Contacted (Yes or No, Date & Time)? \_\_\_\_\_

Who did you Speak to at the Environmental Office? \_\_\_\_\_

Was the Site Cleared by the Environmental Office (Yes or No, Date & Time)? \_\_\_\_\_

Who Cleared the Site? \_\_\_\_\_

**Fill out and fax or mail this form to the Environmental Office within 24 hours of incident occurrence.**

-----**For Environmental Office Use Only**-----

Final Disposition : \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

#### 4.8 Inspection and Testing

Inspection and testing of tanks is required by 40 CFR 112.8(c)(6). The inspection and testing procedures for regulated containers in this Plan are based on applicable industry standards. Mobile and portable tank (including 55-gallon drum) inspection and testing requirements are described in section 4.9. The Steel Tank Institute (STI) Standard SP001-05 (September 2011 revision) applies to stationary shop-built tanks. This standard requires combinations of periodic inspections by owners, certified inspections for the interior and exterior of ASTs, and certified integrity (leak) tests at varying intervals depending on the volume and structure of the AST and secondary containment. Integrity tests are not required for shop-built ASTs with double walls and volumes of less than or equal to 5,000 gallons. Instead, the STI Standard calls for inspection of the interstitial space and verification of the leak detection system.

Monthly AST inspections include the full length of piping associated with the AST. This is a much greater frequency of piping inspection than required by American Petroleum Institute Piping Inspection Code 570 (every 5 years or as determined by risk based analysis). In addition, if underground piping becomes exposed during excavation, construction, or demolition, a visual inspection for corrosion is required. If corrosion is found, then immediate corrective measures are undertaken (such as protective wrapping and coating or pipe replacement) and further excavation is completed to more fully examine the piping. 40 CFR 112.8(c)(8)(v) also requires verification of liquid level sensors on all bulk storage containers, which are tested monthly. Table 4.4 shows the documented inspections required of all bulk storage tanks and piping. Inspection checklists are in Appendix E. Section 4.5 describes recordkeeping procedures.

**Table 4.4 AST and Piping Inspection and Testing**

Inspection/Test	Standard	Method	Frequency
Presence of water in primary tank	STI SP001-05, Appendix C	Sampling	Monthly
Presence of water, oil, or debris in secondary containment	STI SP001-05, Appendix C	Manual	Monthly
Operation of leak detection system	STI SP001-05, Appendix C	Manual	Monthly
Piping connections and openings properly sealed	STI SP001-05, Appendix C	Visual	Monthly
Drain valves operable and in closed position	STI SP001-05, Appendix C	Visual	Monthly

Inspection/Test	Standard	Method	Frequency
Operation of liquid level sensor	STI SP001-05, Appendix C	Manual	Monthly
Visible signs of leakage, corrosion, or damage	STI SP001-05, App C and API 570, App D	Visual	Monthly
Exterior and coating deterioration/corrosion/distortion	STI SP001-05, Appendix C	Visual	Yearly
Operation and cleanliness of operating and emergency vents	STI SP001-05, Appendix C	Visual	Yearly
Emergency vent gasket	STI SP001-05, Appendix C	Visual	Yearly
Proper drainage around tank	STI SP001-05, Appendix C	Visual	Yearly
Tank supports, pad, and foundation damage	STI SP001-05, Appendix C	Visual	Yearly
Tank grounding and electrical wiring	STI SP001-05, Appendix C	Visual	Yearly
Operation of overfill protection devices	STI SP001-05, Appendix C	Visual	Yearly
Certified STI Inspection (Not required of double-walled tanks - 5,000 gallons or less)	STI SP001-05, Appendix C	Enhanced visual and records review	20 Years

#### 4.9 Mobile and Portable Container Policy

Rickenbacker is implementing this policy to manage oils and fuels stored in drums, portable containers, and mobile containers with an oil storage capacity between 55-gallons and 2,000 gallons. Portable containers are typically mounted on skids or saddles and may remain in place for an extended period of time; 55-gallon drums are also considered portable containers. Mobile containers are mounted to frames with wheels. Examples of mobile containers include fuel pods, mobile generator fuel tanks, and tanker trucks. Personnel frequently move these containers or alter the number of containers in a particular area. For this reason, the exact location of each drum, portable container, or mobile container is not included in this Plan. However, the areas that are commonly used for storage of drums or other mobile and portable containers

(and the maximum allowable volume of POL products stored in those areas) are identified in this Plan.

All containers covered by this Mobile and Portable Container Policy must have the means available to prevent discharges to navigable waters. This may include spill kits or spill pallets, diked storage areas, and/or storing containers inside a building.

Inspection and testing of all bulk storage tanks is required by 40 CFR 112.8(c)(6). The inspection and testing procedures for regulated containers in this Plan are based on consideration of applicable industry standards. Mobile and portable tank (including 55-gallon drum) inspection and testing requirements are contained in STI Standard SP001-05 (July 2006 revision). This standard requires periodic inspections by owners and recertification to Department of Transportation (DOT) standards at varying intervals, depending on the material of construction and secondary containment used. Inspection checklists are in Appendix E.

**Table 4.5 Mobile and Portable Container Inspections and Testing**

<b>Inspection/Test</b>	<b>Standard</b>	<b>Method</b>	<b>Frequency</b>
Presence of water in primary tank	STI SP001-05, Appendix C	Sampling	Monthly
Presence of water, oil, or debris in interstice or secondary containment	STI SP001-05, Appendix C	Manual	Monthly
Operation of leak detection system (Double-walled tanks only)	STI SP001-05, Appendix C	Manual	Monthly
Visible signs of leakage or corrosion/distortion	STI SP001-05, Appendix C	Visual	Monthly
Piping connections and openings properly sealed	STI SP001-05, Appendix C	Visual	Monthly
Drain valves operable and in closed position	STI SP001-05, Appendix C	Visual	Monthly
Operation of liquid level sensor	STI SP001-05, Appendix C	Manual	Monthly
DOT recertification and leak testing  (required only if no secondary containment is used)	49 CFR 173.28 49 CFR 178.803 49 CFR 180.605	Hydrostatic Test, Mass Measurement, Level Measurement, Pressure Decay, etc.	Plastic - Every 7 Years  Steel – Every 12 Years  Stainless Steel – Every 17 Years

Records of external inspections are maintained for at least three years. Records of integrity tests shall be maintained for the life of the container. Rickenbacker does not intend to keep any drums beyond the DOT recertification test period. Personnel will track the container's age if a mobile/portable tank or drum is to be used for more than the DOT recertification test period (see table 4.5).

#### **4.10 Rainwater Inspection in Diked Areas**

Some containers are surrounded by secondary containment dikes. Installation personnel drain rainwater from these diked areas through locked, manually activated valves. Prior to release, personnel verify that an oil sheen is not present on the surface of the collected rainwater. If a sheen is present, personnel take appropriate action for reporting and cleanup. Site personnel also maintain a drain log recording the date and volume of rainwater that is released from the diked areas.

#### **4.11 Undiked Areas**

The SPCC regulations in 40 CFR 112.8(b) require facilities to prevent potential discharges from undiked areas by designing drainage systems that flow into catchment basins or lagoons. This does not apply to Rickenbacker. The limited potential for spills outside of typical fuel handling areas does not warrant a complete redesign of the existing drainage system. Rickenbacker's spill response capabilities as described in Section 4.7, proper personnel training as described in Section 4.3, and periodic inspections as described in Sections 4.8 and 4.9 should be adequate to prevent and contain discharges associated with typical failure mode (most likely to be a small drip or leaks from small bore suction piping that only contains oil when an emergency generator is activated) from undiked areas. A spill kit with absorbents would be able to contain and clean up this quantity of oil. This qualifies as equivalent environmental protection (as allowed under 40 CFR 112.7(a)(2)).

Fuel tanks (greater than 55 gallons) on some larger equipment are exempt from SPCC plan requirements, because they are considered "motive power containers". Spills from these containers may occur in undiked areas. Spill response will follow the procedures outlined in Section 4.7.

#### **4.12 New Construction**

Any new construction will comply with the applicable requirements of 40 CFR 112.8(d). New buried metallic piping will either have a protective coating or cathodic protection. In the event that piping is exposed during an excavation, the pipe will be inspected for corrosion and repaired or replaced as necessary.

#### **4.13 General Product Handling**

Installation personnel follow standard operating procedures for product handling as listed in applicable military standards. In general, personnel follow the spill prevention procedures below when transferring product to or from a tanker truck:

- Load or unload in approved locations only
- Establish communications between the pumping and receiving stations
- Verify the available volume of the receiving container
- Properly close all drainage valves for any secondary containment
- Allow sufficient volume (approximately 10% of the total capacity) in the receiving container for thermal expansion
- Visually inspect all valves for leakage when transfer is complete



## 5.0 CONTAINER AREAS

This section of the Plan provides details about SPCC-regulated containers in each area. An area typically encompasses all the containers owned and maintained by a single shop or functional unit. Transformers have been grouped as an “area” because of their common contents and procedures. All SPCC-regulated containers, regardless of container area, are in the consolidated table in Appendix A.

Rickenbacker has the following container areas:

- AASF (Building 918)
- Enclave Maintenance (Building 932)
- Emergency Generator (Building 942)
- Transformers

Containers are given numbers based on the building number closest to the container. In the AASF, numbers start with “918” for the building number then have a consecutive letter designation for the container. “DR” is used as a container designation for drum storage areas. For example, the second drum storage area associated with AASF would be 918DRB.

The term “visual” is used in tables in Section 5 to describe a method of overflow prevention wherein the person filling a container can see the level of product in the container while it is being filled and can immediately shut off inflow upon reaching 90% of container capacity [(40 CFR 112.8(8)(iii-iv)].

## 5.1 AASF (Building 918)

### 5.1.1 Area Description

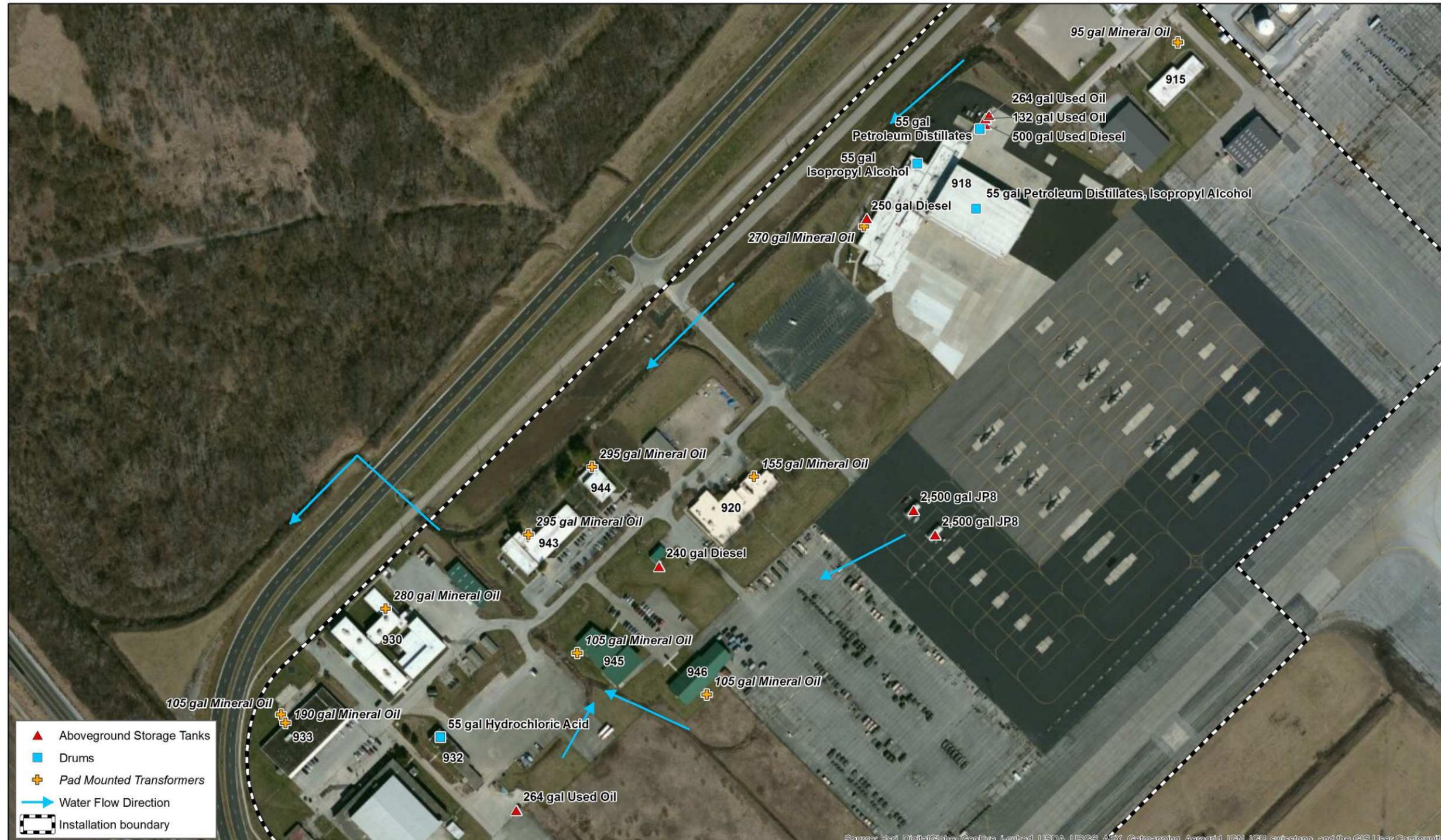
The AASF is located at Rickenbacker Building 918. The facility consists of an administrative office area and a hangar maintenance area. Used oil and used diesel tanks for oils and fuels that do not meet specifications are outside the building. There is also an emergency generator. Drums of products are stored inside the maintenance area and in a separate storage room. Drums of wastes are stored within a self-contained, lockable hazardous material storage unit outside of the building. Table 5.1.1 provides container details, and Figure 5.1.1 shows their locations.

**Table 5.1.1 AASF Containers**

Container ID	Type	Capacity (Gallons)	Material of Construction	Product Stored
918A	AST, Horizontal	132	Steel	Used Oil
918B	AST, Horizontal	264	Steel	Used Oil
918C	AST, Horizontal	500	Steel	Used Diesel
918D	AST, Horizontal	250	Steel	Diesel
918DRA	55-gal Drums	55 (up to 8)	Steel	Petroleum Distillates
				Isopropyl Alcohol
918DRB	55-gal Drums	55 (up to 8)	Steel	Petroleum Distillates
918DRC	55-gal Drums	55 (up to 8)	Steel	Isopropyl Alcohol
918MA	Mobile Refueler	2,500	Steel	JP8
918MB	Mobile Refueler	2,500	Steel	JP8

- Does not contain oil, not regulated by 40 CFR 112

Figure 5.1.1 Rickenbacker Army Enclave



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

UNITED STATES ARMY PUBLIC HEALTH COMMAND ABERDEEN PROVING GROUND, MARYLAND	OHIO NATIONAL GUARD, RICKENBACKER ANGB SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN		0 35 70 140 Meters 
		Prepared by USAPHC GIS Branch Last Update: January 2015	

### 5.1.2 Product Handling

Tanker trucks of up to 3,000-gallon capacity deliver diesel to the generator. AASF personnel follow the truck unloading procedures described in Section 4.13. Mechanics fill the used material tanks by collecting fluids drained from vehicles directly in small containers then using a small pump to transfer into the tank. The used diesel tank (918C) has a broken level gauge (see Corrective Actions, Section 6.0). The used materials are removed from tanks by a vacuum truck and then recycled. Drums of new materials are delivered full. Drums of paint thinners (petroleum distillates) and cleaners (isopropyl alcohol) are used in maintenance activities. Drums of spent thinner are moved to a storage shed to await disposal. Oil and water in the O/W separators are removed by a vacuum truck. Fuel is supplied to aircraft from two 2,500-gallon HEMTTs located at the south end of the flight line. Table 5.1.2 provides more details regarding product handling activities for this area.

**Table 5.1.2 AASF Product Handling**

Container ID	Loading Method	Overfill Protection	Unloading Method
918A to 918C	Small pump	Sight Gauge	Vacuum truck
918D	Truck	Sight Gauge	Used in generator
918DRA	NA	NA	Used in Maintenance
918DRB	Manual	Visual	Removed for Disposal
918DRC	NA	NA	Used in Maintenance
918MA	Fuel Station	Automatic Tank Gauge	Dispensed to Vehicles
918MB	Fuel Station	Automatic Tank Gauge	Dispensed to Vehicles

### 5.1.3 Secondary Containment

Drums are stored on containment pallets or in hazardous materials storage sheds. The containments for 918DRA and 918DRC are not large enough to contain the volume of a drum (see Corrective Actions, Section 6.0). See Appendix D for volume calculations. All ASTs are double-walled, except for the emergency generator tank 918D (see Corrective Actions, Section 6.0). Only the mobile refueler containments collect storm water. The drainage valves on the refueler containments must be left

closed except during supervised drainage of clean storm water (see Corrective Actions, Section 6.0). Spill response materials are available in the building.

**Table 5.1.3 AASF Secondary Containment**

Container ID	Type	Storm Water Release
918A to 918C	Double-walled	NA
918D	None	NA
918DRA	Steel Dike	NA
918DRB	Steel Dike	NA
918DRC	Plastic Pallets	NA
918MA	Steel Dike	Manual
918MB	Steel Dike	Manual

#### 5.1.4 Inspection and Testing

Environmental personnel maintain records of all oil storage container inspections for at least three years as required by 40 CFR 112.7(e). Sections 4.8 and 4.9 establish the Rickenbacker policies for the integrity testing of shop-built containers (and piping) with less than 5,000 gallons capacity and drums, respectively.

#### 5.1.5 Potential Spill Scenarios

The loss of the entire contents of the delivery or collection truck could spill 3,000 gallons. Complete failure of an AST could result in a spill of 500 gallons. A spill from the mobile refueler could spill 2,500 gallons. It is assumed that only one drum would spill in a given event. A spill inside the hangar would flow into a floor drain and through an O/W separator to the storm water system, southwest to the Scioto River (see Figure 5.1.1). A spill in this area would trigger the spill response procedures listed in Section 4.7.

Table 5.1.4 AASF Potential Spill Scenarios

Container ID	Spill Amount (Gallons)	Contents	Cause	Pathway
918A	132	Used Oil	Container Failure	South to storm water inlet via O/W separator and then southwest to Scioto River
	2,000		Collection Truck Error	
918B	264	Used Oil	Container Failure	
	2,000		Collection Truck Error	
918C	500	Used Diesel	Container Failure	
	2,000		Collection Truck Error	
918D	250	Diesel	Container Failure	Southwest in open drainage to Scioto River
	3,000		Delivery Truck Error	
918DRA	55	Petroleum Distillates	Container Failure	Floor drain via O/W separator and then southwest to Scioto River
		Isopropyl Alcohol		
918DRB	55	Petroleum Distillates	Container Failure	South to storm water inlet via O/W separator and then southwest to Scioto River
918DRC	55	Isopropyl Alcohol	Container Failure	Southwest in open drainage to Scioto River
918MA	50	JP8	Dispensing Error	Southwest to storm water inlet and then open drainage to Scioto River
	2,500		Container Failure	
918MB	50	JP8	Dispensing Error	
	2,500		Container Failure	

- Does not contain oil, not regulated by 40 CFR 112

## 5.2 Enclave Maintenance (Building 932)

### 5.2.1 Area Description

Building 932 is used for maintenance of vehicles and equipment used on the enclave. A 264-gallon AST for used oil and a drum of acid are stored at the site. Building 934 stores small containers (5 gallons or less) of various oils and chemicals. Table 5.2.1 provides container details, and Figure 5.1.1 shows their locations.

**Table 5.2.1 Enclave Maintenance Containers**

Container ID	Type	Capacity (Gallons)	Material of Construction	Product Stored
932	AST, Vertical	264	Steel	Used Oil
932DR	55-gallon Drum	55	Steel	Hydrochloric Acid

- Does not contain oil, not regulated by 40 CFR 112

### 5.2.2 Product Handling

Mechanics fill the used oil tank by collecting fluids drained from vehicles directly in small containers then pouring to transfer into the tank. The used oil is removed from the tank by a vacuum truck and then recycled. Drums of new acid are delivered full. The acid is used in battery maintenance. Table 5.2.2 provides product handling details.

**Table 5.2.2 Enclave Maintenance Product Handling**

Container ID	Loading Method	Overfill Protection	Unloading Method
932	Manual	Sight Gauge	Vacuum Truck
932DR	NA	NA	Used in Maintenance

### 5.2.3 Secondary Containment

The AST is a double-walled steel tank. The acid drum is on a 60-gallon nominal capacity containment pallet indoors. Neither collects storm water.

**Table 5.2.3 Enclave Maintenance Secondary Containment**

Container ID	Type	Storm Water Release
932	Double-walled	NA
932DR	Plastic Pallet	NA

### 5.2.4 Inspection and Testing

Records of monthly visual inspections and overfill protection system tests are maintained by area personnel for at least three years. Section 4.8 establishes the Rickenbacker policy for the integrity testing of shop-built containers (and piping) less than 5,000 gallons capacity.

### 5.2.5 Potential Spill Scenarios

Complete container failure of the AST could result in a spill of up to 240 gallons of diesel. The loss of the entire contents of the delivery tanker truck could spill 3,000 gallons of diesel. Any spill from this area would flow north to a storm water ditch and then the storm water collection system southwest to Scioto River (see Figure 5.1.1). A spill in this area would trigger the spill response procedures listed in Section 4.7.

**Table 5.2.4 Enclave Maintenance Potential Spill Scenarios**

Container ID	Spill Amount (Gallons)	Contents	Cause	Pathway
932	264	Used Oil	Container Failure	North to drainage ditch and then southwest to Scioto River
	3,000		Collection Truck Error	
932DR	55	Hydrochloric Acid	Container Failure	

- Does not contain oil, not regulated by 40 CFR 112

### 5.3 Emergency Generator (Building 942)

#### 5.3.1 Area Description

The emergency generator at Building 942 supports computer servers and communications equipment. A 240-gallon AST is an integral part of the site emergency generator. Table 5.3.1 provides container details, and Figure 5.1.1 shows the location.

**Table 5.3.1 Emergency Generator Container**

Container ID	Type	Capacity (Gallons)	Material of Construction	Product Stored
942	AST, Horizontal	240	Steel	Diesel

#### 5.3.2 Product Handling

Tanker trucks of up to 3,000-gallon capacity deliver diesel to the AST. Delivery personnel follow the truck unloading procedures described in Section 4.13. Table 5.3.2 provides product handling details.

**Table 5.3.2 Emergency Generator Product Handling**

Container ID	Loading Method	Overfill Protection	Unloading Method
942	Truck	Sight Gauge	Used in Generator

#### 5.3.3 Secondary Containment

The AST is a double-walled steel tank which does not collect storm water.

**Table 5.3.3 Emergency Generator Secondary Containment**

Container ID	Type	Storm Water Release
942	Double-walled	NA

#### 5.3.4 Inspection and Testing

Records of monthly visual inspections and overfill protection system tests are maintained by area personnel for at least three years. Section 4.8 establishes the Rickenbacker policy for the integrity testing of shop-built containers (and piping) less than 5,000 gallons capacity.

### 5.3.5 Potential Spill Scenarios

Complete container failure of the AST could result in a spill of up to 240 gallons of diesel. The loss of the entire contents of the delivery tanker truck could spill 3,000 gallons of diesel. Any spill from this area would flow south across the grass to a storm water ditch and then southwest to Scioto River (see Figure 5.1.1). A spill in this area would trigger the spill response procedures listed in Section 4.7.

**Table 5.3.4 Emergency Generator Potential Spill Scenarios**

Container ID	Spill Amount (Gallons)	Contents	Cause	Pathway
942	240	Diesel	Container Failure	South to drainage ditch and then southwest to Scioto River
	3,000		Delivery Truck Error	

## 5.4 Transformers

### 5.4.1 Area Description

Oil-filled electrical transformers are located throughout Rickenbacker, typically near large buildings. There are no PCB-containing transformers on Rickenbacker. Personnel also maintain pole mounted transformers with oil storage capacities less than 55 gallons that are not covered under this Plan. The pad mounted transformers all contain more than 55 gallons of oil. Electrical operating equipment is specifically excluded from the definition of bulk storage containers in 40 CFR 112.2. This means that requirements for secondary containment, integrity testing, and spill and overfill prevention do not apply. However, there is still a requirement for appropriate containment and diversionary structures to prevent a spill from reaching navigable waters (40 CFR 112.7(c)). Amendments to 40 CFR 112 (5 December 2008) exempt “oil-filled operational equipment” (such as transformers) from secondary containment requirements if inspection procedures are documented and a spill contingency plan, with a commitment to control any spills, is prepared.

Table 5.4.1 shows the transformer capacities, and Figure 5.1.1, shows their locations and potential spill routes. There has never been a discharge from a transformer at Rickenbacker.

**Table 5.4.1 Electrical Transformers**

Transformer ID	Capacity (Gallons)
T915	95
T918	270
T920	155
T930	280
T933	105
T933	190
T943	295
T944	295
T945	105
T946	105

### 5.4.2 Product Handling

Transformer maintenance includes monitoring the oil level and testing for dissolved gases in the oil. If the oil level drops below the required level, maintenance

personnel add new oil. If the oil quality degrades below standards, then maintenance personnel replace the oil or hire a contractor to perform this service. These events are rare, and in both cases maintenance personnel manually fill the containers from 5 gallon or smaller containers and use drip pans and rags to catch any small spills. Typically, maintenance personnel simply replace an entire transformer if a problem develops. New transformers arrive full of oil, and old transformers are shipped away with their contents intact.

#### **5.4.3 Secondary Containment**

The SPCC regulations require documented inspection procedures and a spill contingency plan, with a commitment to control any spills from oil-filled electrical equipment to prevent a discharge and contain oil until cleanup occurs. A large spill from a transformer would result in power loss and immediate attention from installation personnel. Response personnel would deploy sorbent materials to contain any spilled oil at that time. Personnel may also use portions of Rickenbacker's storm water system to contain a spill prior to contact with navigable waters.

#### **5.4.4 Inspection and Testing**

Maintenance personnel inspect and test transformers when sensors indicate reduced performance. This is similar to having an automatic monitoring system and provides more environmental protection than monthly inspections. If a transformer develops a leak, it will be checked immediately. At that time, oil level and oil quality may be checked. Even though Rickenbacker Army Enclave is not the owner and operator of the transformers, Rickenbacker personnel perform external visual inspections annually or when necessary. Records of these inspections are maintained for three years.

#### **5.4.5 Potential Spill Scenario**

Catastrophic failure of the largest transformer may release 295 gallons of mineral oil. However, the typical failure mode would be corrosion leading to small seeps of oil. The most likely quantity of oil released in these cases would be less than 1 gallon. Facility personnel would respond appropriately according to the procedures outlined in Section 4.7 and prevent the spill from reaching navigable waters (see Figure 5.1.1).

## 6.0 Corrective Actions.

Facilities that are unable to implement their Corrective Actions within 6 months of certification must submit a written extension request to the Regional Administrator in accordance with the requirements of 40 CFR 112.3(f).

This SPCC Plan includes new construction that requires implementation. Table 6.1 shows the new corrective actions required by this Plan. Any updates to the Plan should include Table 6.1 showing the implemented corrective actions.

**Table 6.1 Corrective Actions**

Corrective Actions	Date Signed	Responsible Party	Signature	Comment
Provide adequate secondary containment for emergency generator 918D.				The generator could be replaced with a new double-walled generator or an impervious secondary containment with a volume of at least 300 gallons.
Provide adequate secondary containment for drums of petroleum distillates and isopropyl alcohol (918DRA and 918DRC).				Containment cabinet is only 8 gallons. Containment pallet is only 29 gallons. Capacity must be at least 55 gallons to be as large as the volume of a drum.
Replace level gauge at tank 918C.				Level gauges are required to prevent spills due to overfills.
Ensure that drain valves for mobile refueler containments are closed.				Valves should be left closed, other than during supervised draining of clean storm water.



**Appendix A**  
**SPCC Regulated Containers**

Table A-1. SPCC Regulated Containers

Container ID	Capacity (Gallons)	Material of Construction	Product Stored	Secondary Containment Type
918A	132	Steel	Used Oil	Double-walled
918B	264	Steel	Used Oil	Double-walled
918C	500	Steel	Used Diesel	Double-walled
918D	250	Steel	Diesel	Single-walled
918DRA	55 (up to 2)	Steel	Petroleum Distillates	Steel Dike
			Isopropyl Alcohol	
918DRB	55 (up to 8)	Steel	Petroleum Distillates	Steel Dike
918DRC	55 (up to 2)	Steel	Isopropyl Alcohol	Plastic Pallet
918MA	2,500	Steel	JP8	Steel Dike
918MB	2,500	Steel	JP8	Steel Dike
932	264	Steel	Used Oil	Double-walled
932DR	55 (up to 2)	Steel	Hydrochloric Acid	Plastic Pallet
942	240	Steel	Diesel	Double-walled

- Does not contain oil, not regulated by 40 CFR 112

### Transformers

Container ID	Capacity (Gallons)	Material of Construction	Product Stored	Secondary Containment Type
T915	95	Steel	Mineral Oil	Single-walled
T918	270	Steel	Mineral Oil	Single-walled
T920	155	Steel	Mineral Oil	Single-walled
T930	280	Steel	Mineral Oil	Single-walled
T933	105	Steel	Mineral Oil	Single-walled
T933	190	Steel	Mineral Oil	Single-walled
T943	295	Steel	Mineral Oil	Single-walled
T944	295	Steel	Mineral Oil	Single-walled
T945	105	Steel	Mineral Oil	Single-walled
T946	105	Steel	Mineral Oil	Single-walled

**Appendix B**  
**Certification of the Applicability of the Substantial Harm Criteria**  
**(As per 40 CFR 112.20(f) Appendix C)**

Facility Name: Rickenbacker  
Facility Address: Environmental Office  
NGOH-IMR-ENV  
Ohio Army National Guard  
Columbus, OH 43217

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 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes \_\_\_\_\_ No  X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula 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?

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: \_\_\_\_\_

Date: \_\_\_\_\_

Name: JASON REMICH,  
OHANG Environmental Office



**Appendix C  
Discharge Report to US EPA Regional Administrator**

<b>Facility name and location:</b>	Rickenbacker Army Enclave, Franklin County, Ohio 43217	
<b>Name(s) of the owner or operator of facility:</b>	Ohio Army National Guard Rickenbacker Army Enclave	
<b>Date and year of initial facility operation:</b>	1942	
<b>Maximum storage or handling capacity of the facility &amp; normal daily throughput:</b>		
<b>Estimated amount of spill and type of oil</b>		
<b>Cause(s) of spill, including a failure analysis of system or subsystem in which the failure occurred:</b>		
<b>Corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements:</b>		
<b>Additional preventive measures taken or contemplated to minimize the possibility of recurrence:</b>		
<b>Provide the following:</b>		
<b>Task Completed</b>		<b>Comments</b>
<input type="checkbox"/>	<b>Description of facility, including maps, flow diagrams, and topographical maps.</b>	
<input type="checkbox"/>	<b>The names of individuals and/or organizations also contacted and the date and time contacted.</b>	



## Appendix D

### Volume Calculations for Secondary Containment Dikes

Container ID	Location	Container Type	Container Capacity (gallons)	Length (feet)	Width (feet)	Height (feet)	Containment Capacity (gallons)	Percent Containment Capacity
918DRA	Maintenance Hangar	Drums	55	2.58	2.58	0.17	8	<b><u>15%</u></b>
918DRB	Hazmat Shed, AASF	Drums	55	10.5	5.75	0.5	225	409%
918DRC	Store Room	Drums	55	4.33	2.17	0.42	29	<b><u>53%</u></b>
918MA and 918MB	Mobile Refuelers	Trucks	2,500	40	13.5	0.67	2700	108%

**Underlined Bold** – secondary containment is not large enough to contain tank contents with adequate freeboard for precipitation (110% of container volume).



**Appendix E**  
**Inspection Checklists**

**STI SP001 Monthly Inspection Checklist**

**General Inspection Information:**

Inspection Date: _____	Retain Until Date: _____ (36 months from inspection date)
Prior Inspection Date: _____	Inspector Name: _____
Tanks Inspected (ID #s): _____	

**Inspection Guidance:**

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- (\*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- **In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

Item	Task	Status	Comments
<b>1.0 Tank Containment</b>			
1.1 Containment structure	Check for water, debris, cracks or fire hazard	Yes* No N/A	
1.2 Primary tank	Check for water	Yes* No	
1.3 Containment drain valves	Operable and in a closed position	Yes No* N/A	
1.4 Pathways and entry	Clear and gates/doors operable	Yes No* N/A	
<b>2.0 Leak Detection</b>			
2.1 Tank	Visible signs of leakage	Yes* No	
2.2 Secondary Containment	Visible signs of leakage from tank into secondary containment	Yes* No	
2.3 Surrounding soil	Visible signs of leakage	Yes* No N/A	
2.4 Interstice	Visible signs of leakage	Yes* No N/A	

Item	Task	Status	Comments
<b>3.0 Tank Equipment</b>			
3.1 Valves	a. Check for leaks.	Yes* No N/A	
	b. Tank drain valves must be kept locked.	Yes* No N/A	
3.2 Spill containment boxes on fill pipe	a. Inspect for debris, residue, and water in the box and remove.	Yes* No N/A	
	b. Drain valves must be operable and closed.	Yes* No N/A	
3.3 Liquid level equipment	a. Both visual and mechanical devices must be inspected for physical damage.	Yes No* N/A	
	b. Check that the device is easily readable	Yes No* N/A	
3.4 Overfill equipment	a. If equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery powered. Replace the battery if needed	Yes No* N/A	
	b. If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	Yes No* N/A	
3.5 Piping connections	Check for leaks, corrosion and damage	Yes* No	
<b>4.0 Tank Attachments and Appurtenances</b>			
4.1 Ladder and platform structure	Secure with no sign of severe corrosion or damage?	Yes No* N/A	
<b>5.0 Other Conditions</b>			
5.1	Are there other conditions that should be addressed for continued safe operation or that may affect the site spill prevention plan?	Yes* No	

SEPTEMBER 2011

AST INSPECTION STANDARD

## STI SP001 Annual Inspection Checklist

**General Inspection Information:**

Inspection Date: _____	Retain Until Date: _____	(36 months from inspection date)
Prior Inspection Date: _____	Inspector Name: _____	
Tanks Inspected (ID #s): _____		

**Inspection Guidance:**

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- (\*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

Item	Task	Status	Comments
<b>1.0 Tank Containment</b>			
1.1 Containment structure	Check for: <ul style="list-style-type: none"> <li>• Holes or cracks in containment wall or floor</li> <li>• Washout</li> <li>• Liner degradation</li> <li>• Corrosion</li> <li>• Leakage</li> <li>• Paint failure</li> <li>• Tank settling</li> </ul>	Yes*    No    N/A	
<b>2.0 Tank Foundation and Supports</b>			
2.1 Foundation	Settlement or foundation washout?	Yes*    No	
2.2 Concrete pad or ring wall	Cracking or spalling?	Yes*    No    N/A	

Item	Task	Status	Comments
2.3 Supports	Check for corrosion, paint failure, etc.	Yes* No N/A	
2.4 Water drainage	Water drains away from tank?	Yes No* N/A	
2.5 Tank grounding	Strap secured and in good condition?	Yes No* N/A	
<b>3.0 Cathodic Protection</b>			
3.1 Galvanic cathodic protection system	Confirm system is functional, includes the wire connections for galvanic systems	Yes No* N/A	
3.2 Impressed current system	a. Inspect the operational components (power switch, meters, and alarms).	Yes No* N/A	
	b. Record hour meter, ammeter and voltmeter readings.	Yes No* N/A	
<b>4.0 Tank Shell, Heads, Roof</b>			
4.1 Coating	Check for coating failure	Yes* No	
4.2 Steel condition	Check for:	Yes* No	
	<ul style="list-style-type: none"> <li>• Dents</li> <li>• Buckling</li> <li>• Bulging</li> <li>• Corrosion</li> <li>• Cracking</li> </ul>		
4.3 Roof slope	Check for low points and standing water	Yes* No N/A	
<b>5.0 Tank Equipment</b>			
5.1 Vents	Verify that components are moving freely and vent passageways are not obstructed for: <ul style="list-style-type: none"> <li>• Emergency vent covers</li> <li>• Pressure/vacuum vent poppets</li> <li>• Other moving vent components</li> </ul>	Yes* No	

Item	Task	Status	Comments
5.2 Valves	Check the condition of all valves for leaks, corrosion and damage.	Yes* No	
5.2.1 Anti-siphon, check and gate valves	Cycle the valve open and closed and check for proper operation.	Yes No* N/A	
5.2.2 Pressure regulator valve	Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only)	Yes No* N/A	
5.2.3 Expansion relief valve	Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)	Yes No* N/A	
5.2.4 Solenoid valves	Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)	Yes No* N/A	
5.2.5 Fire and shear valves	a. Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. b. Valves must not be wired in open position.	Yes No* N/A	

Item	Task	Status	Comments
	c. Make sure fusible element is in place and correctly positioned. d. Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.	Yes No* N/A  Yes No* N/A	
5.3 Interstitial leak detection equipment	Check condition of equipment, including: <ul style="list-style-type: none"> <li>• The window is clean and clear in sight leak gauges.</li> <li>• The wire connections of electronic gauges for tightness and corrosion</li> <li>• Activate the test button, if applicable.</li> </ul>	Yes No* N/A	
5.4 Spill containment boxes on fill pipe	a. If corrosion, damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. b. Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. c. Drain valves must be operable and closed	Yes* No N/A  Yes* No N/A	
5.5 Strainer	a. Check that the strainer is clean and in good condition.	Yes No* N/A	

Item	Task	Status	Comments
5.5 Strainer	b. Access strainer basket and check cap and gasket seal as well as bolts.	Yes No* N/A	
5.6 Filter	a. Check that the filter is in good condition and is within the manufacturer's expected service life. Replace, if necessary. b. Check for leaks and decreased fuel flow	Yes No* N/A Yes No* N/A	
5.7 Flame arrestors	Follow manufacturer's instructions. Check for corrosion and blockage of air passages.	Yes* No N/A	
5.8 Leak detector for submersible pump systems	Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.	Yes No* N/A	
5.9 Liquid level equipment	a. Has equipment been tested to ensure proper operation? b. Does equipment operate as required? c. Follow manufacturer's instructions	Yes No* N/A Yes No* N/A Yes No* N/A	
5.10 Overfill equipment	a. Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. b. Confirm device is suited for above ground use by the manufacturer	Yes No* N/A Yes No* N/A	



## STI SP001 Portable Container Monthly Inspection Checklist

**General Inspection Information:**

Inspection Date: _____	Retain Until Date: _____	(36 months from inspection date)
Prior Inspection Date: _____	Inspector Name: _____	
Containers Inspected (ID #s): _____		

**Inspection Guidance:**

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- (\*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.

Item	Area: _____	Area: _____	Area: _____	Area: _____
<b>1.0 AST Containment/Storage Area</b>				
1.1 ASTs within designated storage area?	Yes	No*	Yes	No*
1.2 Debris, spills, or other fire hazards in containment or storage area?	Yes*	No	Yes*	No
1.3 Water in outdoor secondary containment?	Yes*	No	Yes*	No
1.4 Drain valves operable and in a closed position?	Yes	No*	Yes*	No
1.5 Egress pathways clear and gates/doors operable?	Yes	No*	Yes*	No



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**APPENDIX D—EXTERNAL INSPECTION CHECKLIST FOR PROCESS PIPING****D.1 External Inspection Checklist for Process Piping**

Publication Title #

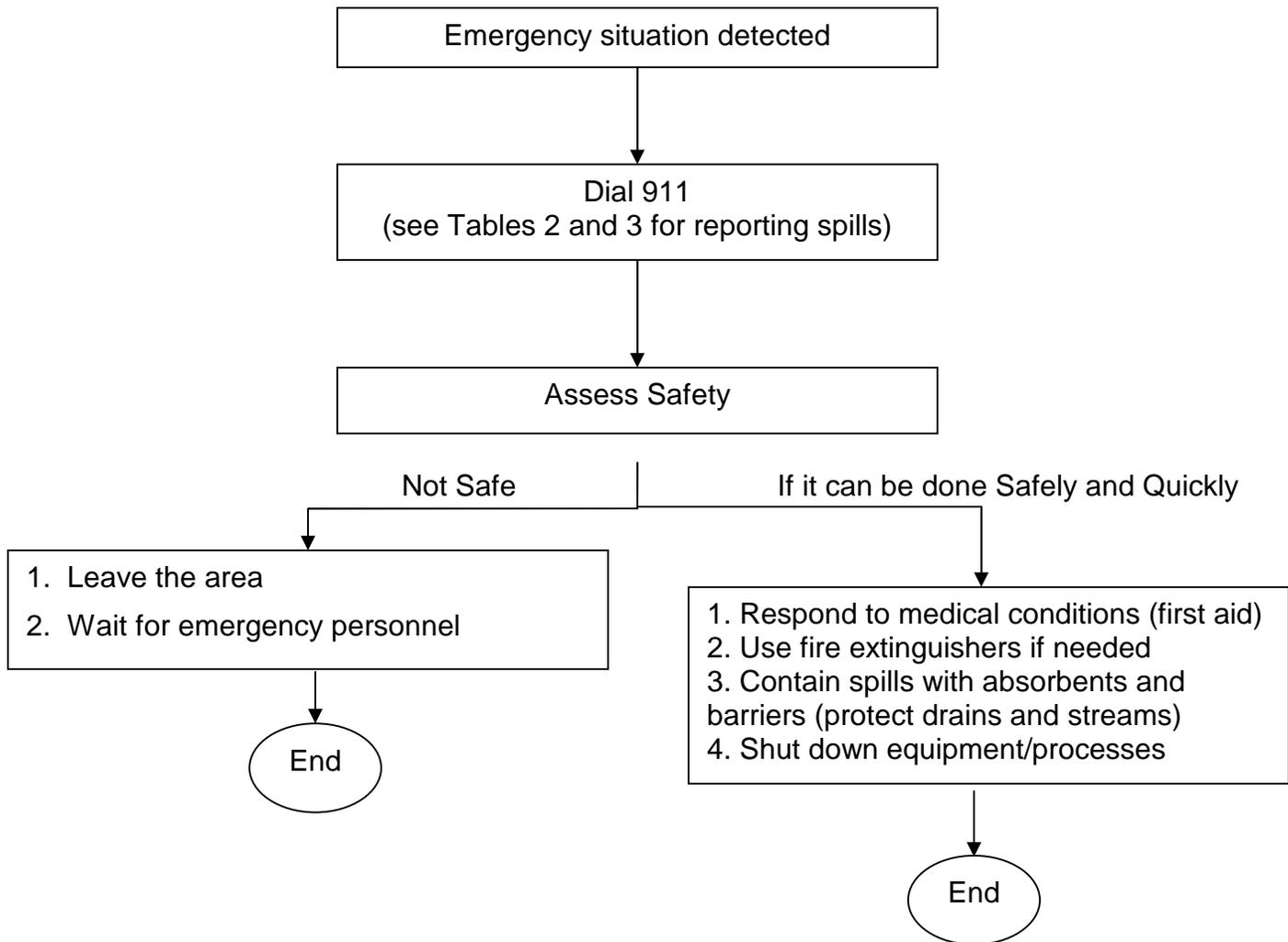
Date Inspected

Item Inspected By Status

- a. Leaks.
  - 1. Process.
  - 2. Steam Tracing.
  - 3. Existing Clamps.
- b. Misalignment.
  - 1. Piping misalignment/restricted movement.
  - 2. Expansion joint misalignment.
- c. Vibration.
  - 1. Excessive overhung weight.
  - 2. Inadequate support.
  - 3. Thin, small-bore, or alloy piping.
  - 4. Threaded connections.
  - 5. Loose supports causing metal wear.
- d. Supports.
  - 1. Shoes off support.
  - 2. Hanger distortion or breakage.
  - 3. Bottomed-out springs.
  - 4. Brace distortion/breakage.
  - 5. Loose brackets.
  - 6. Slide plates/rollers.
  - 7. Counter balance condition.
  - 8. Support corrosion.
- e. Corrosion.
  - 1. Bolting support points under clamps.
  - 2. Coating/Painting deterioration.
  - 3. Soil-to-air interface.
  - 4. Insulation interfaces.
  - 5. Biological growth.
- f. Insulation.
  - 1. Damage/penetrations.
  - 2. Missing jacketing/insulation.
  - 3. Sealing deterioration.
  - 4. Bulging.
  - 5. Banding (broken/missing).

## APPENDIX F

### Immediate Actions



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**Ohio National Guard Spill Response Card****EMERGENCY SPILL RESPONSE**

For use of this form, see AGOR 200-1; the proponent agency is AGOH-FM-EN

**1. PREPLANNING.**

- a. Designate On-Scene Coordinator (OSC)
  - (1) Convoys - Convoy Commander.
  - (2) Refueling Points - Officer in Charge (OIC) and/or Non-Commissioned Officer in Charge (NCOIC).
  - (3) Training Site - Unit Commander
- b. OSC Responsibilities
  - (1) Obtain a list of POL products and hazardous materials. Material Safety Data Sheets (MSDS) will accompany hazardous materials.
  - (2) Ensure absorbent material is readily available. Ensure non-sparking shovels and other tools are available to contain spills if possible. These materials should be placed in a vehicle not carrying hazardous materials or POL.
  - (3) Review hazardous material list, associated hazards and spill response measures in the safety briefing.
  - (4) Review DD Form 836 (Special Instructions for Motor Vehicle Drivers).

**2. SPILL RESPONSE MEASURES.**

- a. Report spill to the OSC immediately.
- b. Identify the spilled substance and evaluate the hazard. **RESIST THE URGE TO RUSH IN!** Don't become an accident statistic or part of the problem. **IF IN DOUBT, STAY OUT!**
- c. Secure the scene. Set up an adequate perimeter to assure the safety of bystanders.
- d. If possible, without exposure of personnel to hazard, contain the spill using whatever means available. Always enter the spill area from upwind, uphill or upstream. Prevent spills from flowing into drainage ditches, storm and sewer drains, and bodies of water. Earthen dams or sandbags are effective.
- e. Limit access to the spill area. Do not allow matches, lighters, smoking, vehicles or any sparking machines into the spill area.
- f. Refer to the Spill Prevention, Control, and Countermeasure Plan, DD Form 836 and/or DOT Pub 5800.5 (Emergency Response Guidebook) if available.

**3. REPORTING SPILLS/EMERGENCY PHONE NUMBERS.**

- a. Always notify the Environmental Office within 24hrs, regardless of the spill amount. (614) 336-7095 (Headquarters) or (614) 336-6568 (RTLIS).
- b. If you can't reach the Environmental Office call the OHANG Joint Operations Center toll free number at 1-888-637-9053 (After Hours and Weekends).
- c. If the spill is a threat to human health or safety notify the Ohio State Highway Patrol (By District) and/or the local Fire Department.

**SPECIAL INSTRUCTIONS: AS A MINIMUM, POST ONE COPY OF THIS DOCUMENT IN THE CONVOY COMMANDER'S VEHICLE, AT ALL REFUELING POINTS AND IN ALL VEHICLES TRANSPORTING POL OR HAZARDOUS MATERIALS (i.e. SOLVENT, THINNER, ETC.)**

AGOH Form 200-1-6 (Supersedes AGOH Form 200-1-6-R dated 1 March 92)

These tables are repeated from Section 4.7 to allow for separation from the rest of the SPCC Plan and easy access in an emergency.

**Table 4.1 Spill Response and Reporting Procedures**

<b>Spill Volume</b>	<b>Response</b>	<b>Reporting</b>
Hazardous Material Less than RQ	Fire Department	OHANG Environmental
Hazardous Material Greater than RQ	Fire Department	NRC, Ohio EPA, JOC, OHANG Environmental
Any amount of POL that reaches a navigable water	Fire Department	NRC, Ohio EPA, JOC, OHANG Environmental
25 gallons or more of POL in a single event	Fire Department	NRC, Ohio EPA, JOC, OHANG Environmental

**Table 4.2 Spill Reporting Agencies**

<b>Agency</b>	<b>Phone</b>
National Response Center	800-424-8802
Ohio EPA	800-282-9378
Rickenbacker International Airport Fire Department	911
JOC	888-637-9053
OHANG Environmental	Work: 614-336-7095 or 614-336-7079 Cell: 614-557-2802
Response Coordinator (CW2 Paul Tumidolsky)	Office: 614-336-6372 Cell: 513-227-3634
Response Coordinator (SGT James Yahn)	Work: 614-336-6425 Cell: 614-451-4159

The information in Table 4.3 should be reported after a spill.

Table 4.3 Spill Incident Report Form

**SPILL INCIDENT REPORT FORM**

For use of this form, see AGOR 200-1; the proponent agency is AGOH-QM-IM-FS-ENV

Unit: \_\_\_\_\_ State: \_\_\_\_\_ Report Date & Time: \_\_\_\_\_

On-Scene Coordinator (OSC Name & Grade): \_\_\_\_\_ Phone: \_\_\_\_\_

Spill Location (Grid or Common Name): \_\_\_\_\_

What was Spilled (Mogas, Diesel, JP8, Other)? \_\_\_\_\_

If Other, Please Specify: \_\_\_\_\_

How Much was Spilled (Gallons)? \_\_\_\_\_

When Did the Spill Occur (Date & Time)? \_\_\_\_\_

How did the Spill Occur? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

What Remedial Action was Taken? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Were there any Injuries (Cause & Number)? \_\_\_\_\_

How Much Soil was Removed (Yards, Barrels, Trash Bags, etc.)? \_\_\_\_\_

Where was the Soil Stockpiled (Grid or Common Name)? \_\_\_\_\_

Was the Environmental Office Contacted (Yes or No, Date & Time)? \_\_\_\_\_

Who did you Speak to at the Environmental Office? \_\_\_\_\_

Was the Site Cleared by the Environmental Office (Yes or No, Date & Time)? \_\_\_\_\_

Who Cleared the Site? \_\_\_\_\_

**Fill out and fax or mail this form to the Environmental Office within 24 hours of incident occurrence.**

-----**For Environmental Office Use Only**-----

Final Disposition : \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## **APPENDIX G**

### **OHANG Spill Prevention, Control, and Countermeasure Plan Training Presentations**

(Training and signed rosters available onsite in environmental binders, on website or through environmental office. Jason Remich)