

**SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN  
(SPCC)  
FOR  
MINNESOTA POWER'S**

**TRI-COUNTY 230/34.5 kV SUBSTATION  
GLEN ULLIN, NORTH DAKOTA**

**Owned and Operated by  
Minnesota Power  
30 West Superior Street  
Duluth, MN 55802**

**Professional Engineer Certification      40 CFR 112.3(d)**

CERTIFICATION: By means of this certification, I attest that I am familiar with the requirements of provisions 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required inspections and testing have been established and that the Plan is adequate for the facility.

Engineer:

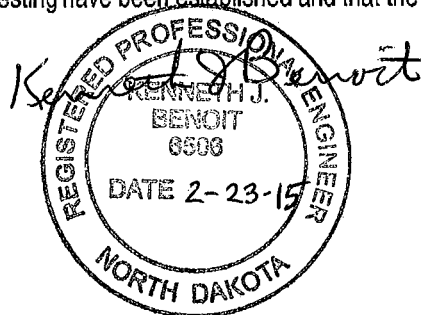
*Kenneth J. Benoit*

Kenneth J. Benoit P.E.

Registration No.: PE-6506

State: North Dakota

Date of Plan Certification



**SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN  
MANAGEMENT APPROVAL 40 CFR 112.7**

I hereby certify that the necessary resources to implement this Plan have been committed.

*Michael Klapp*

Michael Klapp-Director Transmission Asset Management

2/23/15

Date

**SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN  
(SPCC PLAN) FOR**

**TRI-COUNTY 230/34.5 kV SUBSTATION  
GLEN ULLIN, NORTH DAKOTA**

**Quick Reference Reporting Information**

The Minnesota Power Tri-County (for Bison 4) Wind Substation is located in the E1/2 of the SE1/4 of the SE1/4 and the SE1/4 of the NE1/4 of the SE1/4 of Section 36, Township 141 North and Range 88 West, Mercer County, North Dakota, 5<sup>th</sup> Principal Meridian. The site address is 2975 60<sup>th</sup> Ave SW, Glen Ullin, ND 58631.

Facility drawing ME-32858-12 is included as Attachment A. A copy of this SPCC Plan is maintained at the substation.

**Accountable Person:** Peter Schommer, Supervising Engineer, is accountable for oil spill prevention at this facility.

**CONTACTS**

<b>Name</b>	<b>Title</b>	<b>Telephone</b>
<b><u>SUBSTATION TECHNICAL SUPPORT</u></b>		
Corey Axtman	HVDC Technician Lead	Office (701) 843-6141 Cell/Home (701) 214-7285
Tyler Hardy	HVDC Technician Senior	Office (701) 843-6142 Cell/Home (701) 214-7236
Peter Schommer	Supervising Engineer	Office (218) 355-2639 Cell/Home (651) 253-0661
<b><u>MINNESOTA POWER ENVIRONMENTAL</u></b>		
Normal Business Hours	(Environmental Hotline)	(218) 355-3200 Or Extension 3200
After-Hours	(Service Dispatch)	(218) 720-2764 Or Extension 2764
<b><u>NORTH DAKOTA DEPARTMENT OF HEALTH</u></b>		
Business Hours	(Water Quality Division)	(701) 328-5210
After-Hours	(State Emergency Services)	(800) 472-2121
<b><u>FEDERAL REGULATORY AGENCIES</u></b>		
Region 8 Federal EPA	Denver, CO	(303) 293-1788
Federal National Response Center in Washington, DC		(800) 424-8802

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## **1.0 Plan Amendments**

### **1.1 Summary of Plan Reviews and Amendments**

In accordance with 40 CFR 112.5 (a) and (b), a review and evaluation of this SPCC Plan is conducted at the time of a Facility change that "materially affects the potential for a discharge" but at least once every three years prior to August 16, 2002, and at least once every 5 years after August 17, 2002. Minnesota Power recently constructed the Tri-County 230/34.5 kV Substation. This SPCC Plan was created as a result. Reviews, evaluations and amendments occurring after August 17, 2002 are recorded as Attachment B.

## **2.0 General Facility Description**

### **2.1 Location of Facility**

The Minnesota Power Tri-County substation services the Bison 4 Wind facility and is located in in the E1/2 of the SE1/4 of the SE1/4 and the SE1/4 of the NE1/4 of the SE1/4 of Section 36, Township 141 North and Range 88 West, Mercer County, North Dakota, 5<sup>th</sup> Principal Meridian. The site address is 2975 60<sup>th</sup> Ave SW, Glen Ullin, ND 58631.

Facility drawing ME-32858-12 is included as Attachment A. A copy of this SPCC Plan is maintained at the substation.

### **2.2 Description of Facility**

The Tri-County Substation contains the oil filled electrical equipment required for high voltage conversions and transfers of electrical energy between Minnesota Power's Bison 4 Wind farm and the Minnesota Power 250kV HVDC Substation located at Center, ND..

Minnesota Power owns all of the oil-filled electrical equipment in the Tri-County Substation.

The Tri-County Substation is in continuous operation and is inspected once every two weeks by Minnesota Power Tech Systems personnel from the Minnesota Power HVDC Substation located near Center, ND.

### **2.3 Applicability of 40 CFR 112**

The oil volumes present at the Tri-County Substation exceed the de minimus level of 1,320 gallons as established in 40 CFR 112.1 (d) 2 (ii). The largest single container has a volume of approximately 12,349 gallons. Surface precipitation from the Tri-County Substation could eventually go north toward the Coyote Creek drainage. For these reasons, 40 CFR 112 is considered to be applicable to the Tri-County Substation.

### **2.4 Certification of the Applicability of the Substantial Harm Criteria Checklist**

An evaluation of the Substantial Harm Criteria has been conducted and it has been determined that the Criteria is not applicable to the Tri-County Substation. The completed Criteria checklist is included as Attachment C.

## **3.0 Conformance With Applicable Requirements**

### **3.1 Conformance with Requirements 112.7(a)(1)**

The SPCC Plan for the MP Tri-County Substation conforms to the requirements of 40 CFR 112.

This SPCC Plan has been certified by a registered professional engineer as required by Section 112.3(d) of the regulations. This SPCC Plan has the full approval of management at a level of authority to commit the necessary resources as required by Section 112.7. Minnesota Power will amend and review this SPCC Plan in accordance with the requirements of Section 112.5 of the regulations.

**3.2 Non-Conformance with Requirements** **112.7(a)(2)**  
 Not Applicable

**4.0 – Physical Layout of Facility** **112.7(a)(3)**  
 Drawing ME-32858-12 shows the Tri-County Substation has been included as page 1.1. The location of all oil filled equipment and the quantity and type of oil in each is shown.

**5.0 – Listing of Oil-Filled Equipment** **112.7(a)(3)(i)**  
 The following electrical equipment contains oil used as an electrical insulation and cooling medium and is present at the Tri-County Substation:

Description/Equipment ID	No. of Units	Gallons Per Unit	Total Gallons	Oil Type
Transformer 1TR	1	12,349	12,349	Mineral
Transformer – Station Service 34.5 KV	1	110	110	Mineral
230KV CCVT – 103 L6	3	21.9	65.7	Mineral
230 KV CCVT – 1H6	1	21.9	21.9	Mineral
Metering Current Transformer 34.5 KV	3	15.0	45.0	Mineral

**6.0 – Discharge Prevention Measures** **112.7(a)(3)(ii)**  
 Periodic maintenance operations require the use of portable oil-filled equipment and tanks. This equipment will be temporarily located within the confines of the substation during maintenance of oil-filled equipment. The volume of oil in these portable pieces of equipment and tanks is not expected to exceed the quantity contained by the largest permanent piece of equipment located at this facility. Maintenance personnel will be present at all times during operations which require the transfer of oil. Oil handling equipment will be properly maintained and inspected to minimize the potential for a discharge.

**7.0 – Discharge or Drainage Controls** **112.7(a)(3)(iii)**  
 The following features, which minimize the possibility of oil spills reaching navigable waters, have been designed into this facility:

- a. Oil level sensing devices with alarms are present on the large substation transformers. The alarm function would alert response personnel and provide an opportunity to limit the amount of oil loss.
- b. The substation surfacing is porous and was designed to retain oil from any other unit (110 gallons or less).
- c. The large substation transformer has a dedicated containment pit with a sump.

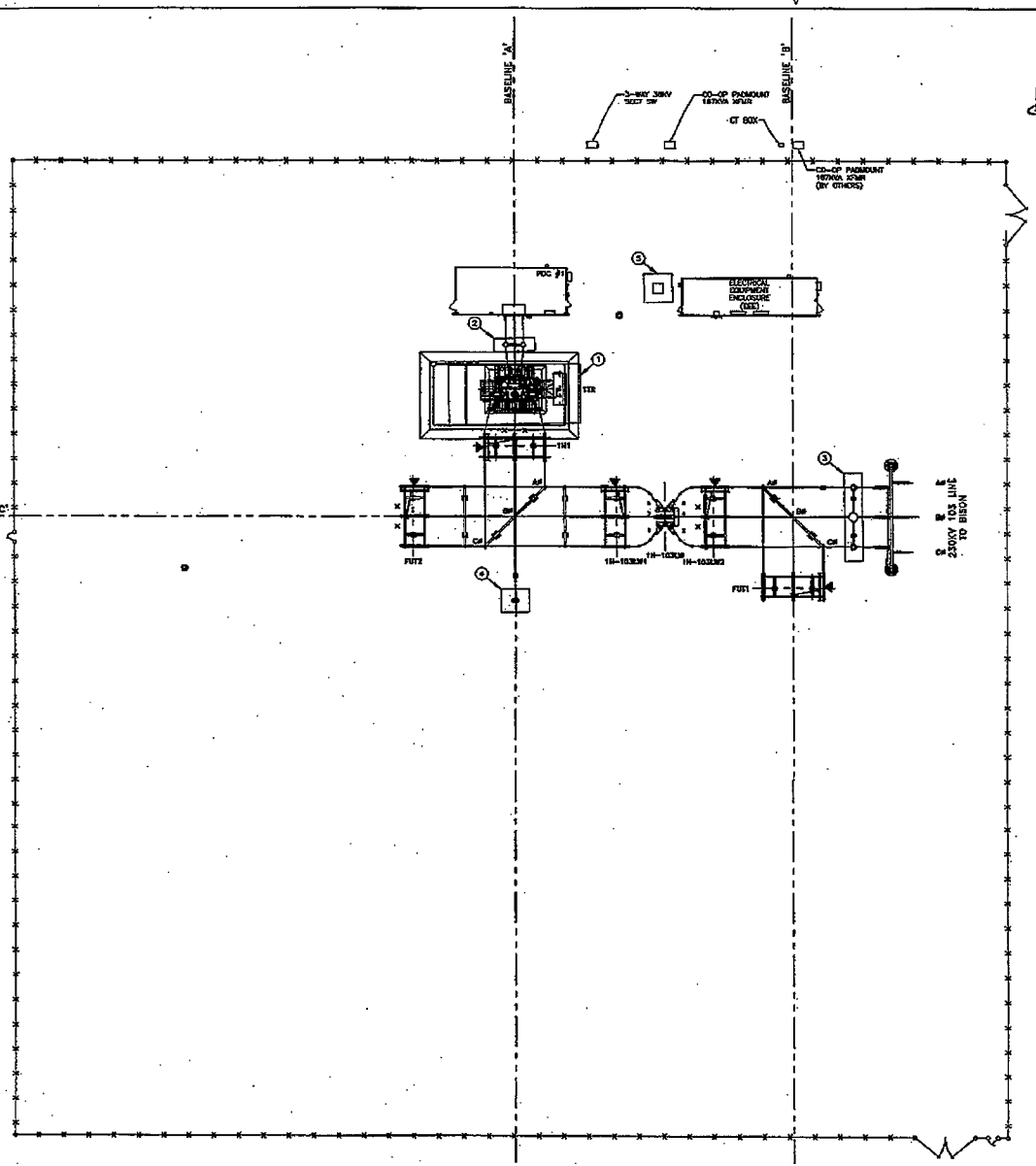
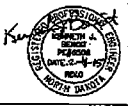
Appropriate containment and/or yard drainage should prevent any contaminants from reaching navigable water. The risk of a reportable spill from this facility has been evaluated and the safeguards noted above have been constructed.

MARK	NUMBER OF UNITS	DESCRIPTION	GALLONS PER UNIT	TOTAL GALLONS	OIL TYPE
1	1	1TR 480V TRANSFORMER 02/120/100MVA 345/230KV	12,348	12,348	NON PCB MINERAL OIL
2	3	34.5KV METAL CLAD TRANSFORMER 480/230V-200	15	45	NON PCB MINERAL OIL
3	3	230KV COV-VOLLE ALUMIN CITY-2400V	21.9	65.7	NON PCB MINERAL OIL
4	1	230KV COV-VOLLE ALUMIN CITY-2400V	21.9	21.9	NON PCB MINERAL OIL
5	1	24.5KV 1875VA RATON FORMER PRELUANT TRANSFORMER	110	110	NON PCB MINERAL OIL

REFERENCE DRAWINGS	
TITLE	DRAWING NO. SERIES
FORCE & FOUNDATION PLAN	ME-32858-03 24.1
SPCC PLAN & DETAILS 1TR	ME-32858-12 24.1
SPCC PLAN BASE & DETAILS 2TR	ME-32858-12 24.2
SPCC PLAN 1875	ME-32858-12 24.3

**LEGEND**  
 ▽ OPERATOR MACHINES  
 X NON OUTDOOR LIGHT

*Page 2 of 1*



NO.	DATE	REVISION DESCRIPTION	BY	APPROVED	NO.	DATE	REVISION DESCRIPTION	BY	APPROVED	DESIGN BY	ENR
D	01-22-15	FIELD REVISIONS - NLD/102270	ER	ESD							



TRI-COUNTY 230KV SUBSTATION  
 SPCC PLAN VIEW

SHEET 3 OF 3  
 ME-32858-12

CADD DRAWING - FOR REPRODUCTION ONLY

SCALE	1"=20'-0"
TOTAL	3500
DATE	01-22-15

**8.0 - Spill Discovery, Response & Cleanup**

**112.7(a)(3)(iv)**

Small scale spills and leaks would normally be discovered during facility inspections which occur once every two weeks. All substation equipment including transformers and other oil-filled equipment are visually inspected as are substation containment systems. Radio and/or telephone communications are readily available for emergency use in reporting any abnormal conditions.

A catastrophic failure of oil-filled electrical equipment would normally result in a fault on the electrical transmission or distribution system. A fault on the electrical system would normally be quickly brought to the attention of the System Operators. The System Operators would immediately contact Tech Systems Substation C&M personnel to investigate the failure. If an oil spill does occur, qualified personnel will be dispatched immediately to clean up the spill, repair equipment, and eliminate further oil spillage. The responding crew is stationed at Minnesota Power's Center, ND HVDC Substation which is located about 45 miles to the northeast of the Tri-County Substation. Oil absorbent materials would be made available by the responding Minnesota Power crew.

**9.0 - Disposal of Contaminated Materials**

All containers/bags of cleanup debris are labeled as to their contents, the date and the spill location to allow for proper waste tracking and management.

Any Non-PCB mineral oils recovered from damaged or leaking electrical equipment are burned for energy recovery as Used Oil. Hydraulic oils and any other lubricating oils recovered from on-site equipment would also be burned as Used Oil for energy recovery. Recovered mineral oils or other fluids which contain regulated levels of PCBs are sent off-site to permitted TSD Facilities for reclamation or disposal.

Non-PCB mineral oil contaminated soils, sod and floor-dry are collected, processed and burned in a permitted industrial boiler, or sent to a permitted industrial solid waste landfill. Soils, sod, floor-dry and any other absorbents contaminated with oils which contained regulated levels of PCBs are sent to a TSCA landfill for disposal. Combustible absorbents which are contaminated with Non-PCB mineral oils, hydraulic oils or other lubricating oils are collected and sent off-site for processing and burning for energy recovery at a permitted facility.

**10.0 - Contact List and Phone Numbers**

**112.7(a)(3)(vi)**

Contact lists for equipment repair, spill containment, cleanup and regulatory agency reporting are included in this and the following Article of this Plan.

**CONTACTS**

Name	Title	Telephone
<b><u>SUBSTATION TECHNICAL SUPPORT</u></b>		
Corey Axtman	HVDC Technician Lead	Office (701) 843-6141 Cell/Home (701) 214-7285
Tyler Hardy	HVDC Technician Senior	Office (701) 843-6142 Cell/Home (701) 214-7236

Peter Schommer

Supervising Engineer

Office (218) 355-2639  
Cell/Home (651) 253-0661

**MINNESOTA POWER ENVIRONMENTAL**

Normal Business Hours      Environmental Hotline      (218) 355-3200  
Or Extension 3200

After-Hours      Service Dispatch      (218) 720-2764  
Or Extension 2764

**NORTH DAKOTA DEPARTMENT OF HEALTH**

Business Hours      Water Quality      (701) 328-5210

After-Hours      State Emergency Services      (800) 472-2121

**FEDERAL REGULATORY AGENCIES**

Region 8 Federal EPA      Denver, CO      (303) 293-1788

Federal National Response Center in Washington, DC      (800) 424-8802

**Telephone Reporting Procedure: System Reliability and Spill Cleanup**

All spills of oil must be reported immediately. The person discovering a spill should notify his or her supervisor or other levels of supervision that are immediately available. The supervisor, if available, or the individual observing the spill will then contact one of the individuals listed below who are responsible for dispatching a cleanup crew.

**11.0 – Reporting Information: Environmental      112.7(a)(4)**

The supervisor, if available or the individual observing the spill will then contact personnel listed in Article 10.0 above to ensure that the appropriate environmental agency reporting occurs.

**The person reporting the spill should be prepared to provide the following information:**

- The name and address of the facility (reference page ii).
- The date and time of the spill.
- The source and cause of the spill; what was spilled and how much was spilled.
- Whether any surface waters were impacted by the spill. What media was affected by the spill?
- Note any other damages or injuries caused by the spill.
- Spill containment/cleanup actions taken.
- Whether any evacuations will be required because of the spill and the names and organizations of those others notified of the spill.

The regulatory agency contact numbers are listed above in Article 10.0.

**12.0 – Spill Response Procedures 112.7(a)(5)**

Spill response procedures have been discussed above in Articles 8, 9, 10 and 11.

**13.0 – Predicted Direction, Rate of Flow, & Quantity of Potential Spills 112.7(b)**

The number of variables in location of equipment, degree of failure, and the response of personnel make predicting the quantity of a potential spill difficult.

Failures resulting in oil losses could occur in any of the equipment listed in Section 5.0. Structural damage of oil filled electrical equipment is usually confined to the bushings, mechanical relief devices, access holes and the side wall/cover interface. Since the physical location of these elements is near the top of the equipment, oil normally remains inside the equipment. In the event a pressure relief valve operates, approximately 10 gallons of oil could be released. Under extreme conditions, up to 50 gallons could be released. Discharge of oil from this facility as a result of such a failure is unlikely and the potential for equipment failures resulting in an oil spill reaching navigable waters is remote.

In the event of a catastrophic failure of electrical equipment, the secondary containment mechanisms of Article 7 would be effective.

**14.0 – Containment Structures or Equipment 112.7(c)**

See Article 7.0 of this SPCC Plan.

**15.0 – Impractical Containment Situations 112.7(d)**

All containment measures discussed in Article 7.0 have been constructed.

**16.0 – Inspections, Tests, & Records 112.7(e)**

**16.1 Inspections**

The electrical equipment at this facility is inspected once every two weeks by operating personnel for signs of deterioration, leaks, or accumulation of oil on the ground. Personnel conducting inspection of this facility should make notifications as per Article 10.0 if abnormal conditions are observed.

Personnel conducting inspections of these facilities shall, after finding everything in order, sign the Oil Spill Inspection Log certifying that no evidence of an oil spill has been observed. These Oil Spill Inspection Logs shall remain at the site for a period of at least five years, preferably indefinitely. For a sample inspection log, see Attachment D to this document.

**16.2 Spill Report**

The sample Spill Report found in Attachment E has been adopted by Minnesota Power for use in documenting oil spill incidents. It is intended to provide information required for record-keeping purposes as well as future planning of oil containment facilities.

**17.0 – Personnel, Training, and Discharge Prevention Procedures 112.7(f)**

**17.1 Training Contents 112.7(f)(1)**

Maintenance crews are trained in the proper operation and maintenance of oil filled electrical equipment and oil handling equipment to reduce the potential for discharge. Maintenance crews are trained in discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the contents of this SPCC Plan. Maintenance crews

are also trained in the use of oil containment equipment and absorbent materials to contain and clean up discharged oil.

**17.2 Accountable Person** **112.7(f)(2)**  
Peter Schommer, Supervising Engineer, is accountable for oil spill prevention at this facility.

**17.3 Training Frequency** **112.7(f)(3)**  
Exercises and briefings reviewing oil spill response procedures including material availability, equipment operation, etc., will be conducted on an annual basis for personnel responsible for inspection and oil spill cleanup.

**18.0 – Security** **112.7(g)**  
**18.1 Facility Fencing** **112.7(g)(1)**  
The Tri –County Substation is fully fenced and the entrance gate is locked when the facility is not staffed.

**18.2 Drain Valves** **112.7(g)(2)**  
Drain valves for energized electrical equipment are equipped with blank flanges, caps, or plugs.

**18.3 Oil Pumps** **112.7(g)(3)**  
The large substation transformer is surrounded by a containment pit which contains a sump. The sump is equipped with an electric pump which is manually started to remove precipitation following an inspection to confirm that the precipitation is not contaminated with oil.

**18.4 Loading/Unloading Connections** **112.7(g)(4)**  
See Article 19.0.

**18.5 Facility Lighting** **112.7(g)(5)**  
Lighting is adequate to observe spills during darkness and to discourage vandalism.

**19.0– Facility Tank Car & Tank Truck Unloading** **112.7(h)**  
The facility does not contain Tank Car and Tank Truck Unloading equipment. The use of tank trucks for loading and unloading of oil from electrical equipment is described in Section 6.0 of this SPCC Plan.

**20.0 – Field Constructed Aboveground Container** **112.7(i)**  
This facility does not utilize field-constructed containers.

**21.0 – Other Applicable State Rules, Regulations, and Guidelines** **112.7(j)**  
Regulations of the North Dakota Dept. of Health and federal EPA will be complied with. Efforts to avoid spills of petroleum must be undertaken and preparations must be made to respond to potential spill scenarios. Spill response includes scene safety, oil containment, spill reporting, spill clean-up and waste management.

**22.0 – Conformance With 40 CFR 112.7 and 112.8** **112.8(a)**  
The facility design and operation conforms to the requirements given the containments discussed in Article 7.0.

<b>23.0 – Facility Drainage</b>	<b>112.8(b)</b>
<b>23.1 Draining Diked Area With Pumps, Ejectors</b> See Article 18.3.	<b>112.8(b)(1)</b>
<b>23.2 Draining Diked Areas With Valves</b> Not Applicable.	<b>112.8(b)(2)</b>
<b>23.3 Containment For Undiked Areas</b> As discussed in Article 7.0.	<b>112.8(b)(3)</b>
<b>23.4 Diversion Systems For Undiked Areas</b> As discussed in Article 7.0.	<b>112.8(b)(4)</b>
<b>23.5 Drainage Treatment Units</b> This site has been engineered to prevent oil from reaching navigable waters. There are no drainage treatment units at the facility.	<b>112.8(b)(5)</b>
<b>24.0 – Bulk Storage Containers</b> This facility has no bulk storage containers.	<b>112.8(c)</b>
<b>25.0 – Facility Transfer Operations</b> Periodic maintenance operations require the use of portable oil-filled equipment and tanks. This equipment will be temporarily located within the confines of the substation during maintenance of oil-filled equipment. The volume of oil in these portable pieces of equipment and tanks is not expected to exceed the quantity contained by the largest permanent piece of equipment located at this facility. Maintenance personnel will be present at all times during operations which require the transfer of oil.	<b>112.8(d)</b>
<b>25.1 Piping Corrosion Protection</b> There is no buried oil piping at this site.	<b>112.8(d)(1)</b>
<b>25.2 Capping &amp; Marking Terminal Connections</b> Drain connections on electrical equipment are capped and valves are closed.	<b>112.8(d)(2)</b>
<b>25.3 Pipe Support Design</b> Not applicable	<b>112.8(d)(3)</b>
<b>25.4 Inspections and Testing</b> Not applicable	<b>112.8(d)(4)</b>
<b>25.5 Traffic Notification</b> There is no overhead piping	<b>112.8(d)(5)</b>

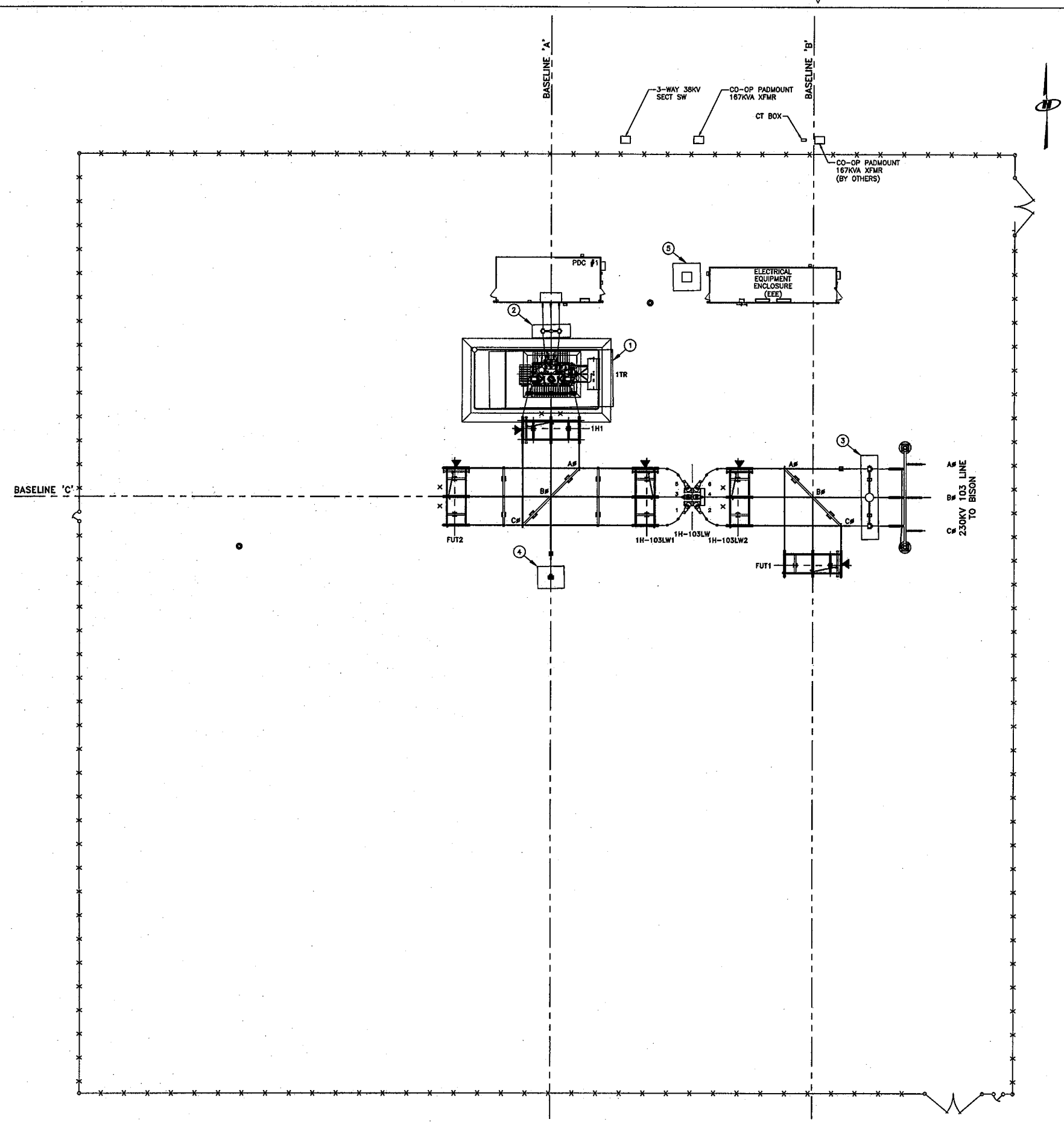
**ATTACHMENT A**

DRAWING ME-32858-12

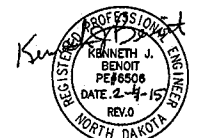
MARK	NUMBER OF UNITS	DESCRIPTION	GALLONS PER UNIT	TOTAL GALLONS	OIL TYPE
1	1	1TR ABB TRANSFORMER 90/ 120/ 150MVA 34.5/230KV	12,349	12,349	NON PCB MINERAL OIL
2	3	34.5KV METERING CURRENT TRANSFORMER ABB CXM-200	15	45	NON PCB MINERAL OIL
3	3	230KV CCVT-103L6 ALSTOM OTCF-245EM	21.9	65.7	NON PCB MINERAL OIL
4	1	230KV CCVT-1H6 ALSTOM OTCF-245EM	21.9	21.9	NON PCB MINERAL OIL
5	1	34.5KV 167KVA STATION SERVICE PADMOUNT TRANSFORMER	110	110	NON PCB MINERAL OIL

REFERENCE DRAWINGS	
TITLE	DRAWING NO. SERIES
FENCE & FOUNDATION PLAN	ME-32858-05 SH.1
SPCC PLAN & DETAILS 1TR	ME-32858-12 SH.1
SPCC PLAN NOTE & DETAILS 1TR	ME-32858-12 SH.2
SPCC PLAN VIEW	ME-32858-12 SH.3

**LEGEND**  
 ▼ OPERATOR MECHANISM  
 X 65W OUTDOOR LIGHT



Page 2.1



NO.	DATE	REVISION DESCRIPTION	BY	APPROVED	NO.	DATE	REVISION DESCRIPTION	BY	APPROVED	DRAWN BY	EJR
0	01-22-15	FIELD REVISIONS - W.O.#100870	ER	KJB							



TRI-COUNTY 230KV SUBSTATION  
 SPCC PLAN VIEW

SHEET 3 REV. 0  
 ME-32858-12

SCALE	1"=20'-0"
TCY	3500 3000

**ATTACHMENT B**

**SPCC AMENDMENTS SUMMARY AND DETAILS**

**Tri-County Substation**

	<u>Reviewer(signature)</u>	<u>Reviewer(print)</u>	<u>Date</u>	<u>Will The SPCC Plan Be Amended?</u>	<u>P.E. Stamp Required?</u>
1	See Cover	Kenneth J. Benoit PE 6506-North Dakota	See Cover	Plan Created New As Of Plan Cover Date	See Cover
2					
3					
4					
5					
6					
7					
8					

**TRI-COUNTY SUBSTATION**  
**SPCC Amendment Detail Log**

<u>Item Number</u>	<u>Item Description</u>
1	The Tri-County Substation was constructed to collect and transfer electrical energy from the Bison 4 wind turbines and forward that electrical energy to Minnesota on the DC transmission line system.

ATTACHMENT C

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: Tri-County Substation, Glen Ullin, North Dakota..

FACILITY ADDRESS: . The site address is 2975 60th Ave SW, Glen Ullin, North Dakota, 58631.

- 1. Does the facility transfer oil over water to 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 storage capacity greater than or equal to one 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 storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II and III to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan. Yes \_\_\_\_\_ No \_\_\_X
4. Does the facility have a total storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²? Yes \_\_\_\_\_ No \_\_\_X
5. Does the facility have a total storage capacity greater than or equal to one million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? Yes \_\_\_\_\_ No \_\_\_X

CERTIFICATION

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

Name: Kenneth J. Benoit

Signature

Kenneth J Benoit

Title Engineer-PE

Date

2-23-15

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

² For the purposes of CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2 (c). (from 40 CFR 112 Appendix C, Attachment C-II).





**ATTACHMENT F**  
Reference Plan Article 10.0

**ATTACHMENT G**

**Records of Draining Containment Areas**  
Incorporated with the inspection Logs in Attachment D

**ATTACHMENT H**

**Inspections & Testing of Bulk Storage Containers**  
Not Applicable To The Tri-County Substation

**ATTACHMENT I**

**High Level Alarm Test Records For Bulk Storage Containers**  
Not Applicable to the Tri-County Substation

**ATTACHMENT J**

**Integrity Testing For Buried Piping For Bulk Storage Containers**  
Not Applicable To The Tri-County Substation