SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN
City of Arlington
Arlington Municipal Airport

February 17, 2005

Submitted to:

The City of Arlington
Arlington Municipal Airport
18204 59th Drive NE
Arlington, Washington 98223
(360) 403-3470

Submitted by:

Shaw™ Shaw Environmental, Inc.

19909 120th Avenue NE, Suite 101
Bothell, Washington 98011
(425) 485-5000

Table of Contents

List of Tables

List of Appendices

1.0 Management Approval and SPCC Plan Review

1.1 Management Approval

Name and Address of Facility:

The City of Arlington
Arlington Municipal Airport
18204 59th Drive NE
Arlington, Washington 98223
(360) 403-3470

Type of Facility:

Municipal Airport with surrounding industrial and commercial leased space

Date of Initial Operation:

1941

Name and Address of Owner:

The City of Arlington
Arlington Municipal Airport
18204 59th Drive NE
Arlington, Washington 98223
(360) 403-3470

Designated Person Responsible for Oil Spill Prevention:

Mr. Rob Putnam, Airport Manager

Approval:

Full approval is extended by Management at a level with authority to commit the necessary resources toward spill prevention. The programs and procedures outlined in this Plan will be implemented and periodically reviewed in accordance with 40 Code of Federal Regulations (CFR) Part 112, as amended, with applicable Washington state and local requirements.

Rob Putnam, Airport Manager

1.2 SPCC Plan Review and Amendment

A complete review and evaluation of the Spill Prevention, Control, and Countermeasure (SPCC) Plan will be conducted at least every five years in accordance with 40 CFR 112.5(b). Complete the information below when conducting the five-year review. Note that all technical amendments in the SPCC Plan must be reviewed and certified by a Professional Engineer (PE). Any amendments to the SPCC Plan will be implemented as soon as possible, but no later than six months after preparation of the amendment.

By signing below, the reviewer(s) attest(s) to the following statements: "I (We) have completed a review and evaluation of the SPCC Plan for the City of Arlington, Arlington Municipal Airport on the date indicated below, and will/will not amend the Plan as a result."

Date of Review & Evaluation	Name of Person Performing Review	Signature of Reviewer	Will the SPCC Plan be Amended (Yes/No)?

2.0 Professional Engineer Certification

In accordance with 40 CFR 112.3(d), I hereby certify that:

- I am familiar with the provisions of 40 CFR Part 112 – Oil Pollution Prevention;
- I, or my agent, have visited and examined the facility described herein;
- This SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the applicable requirements of 40 CFR Part 112;
- Procedures for required inspections and testing have been established; and
- This SPCC Plan is adequate for the facility.

Site Name: City of Arlington, Arlington Municipal Airport

Site Address: 18204 59th Drive NE, Arlington, Washington 98223

Name of Professional Engineer (typed): Kent W. Wiken

Company: Shaw Environmental, Inc.

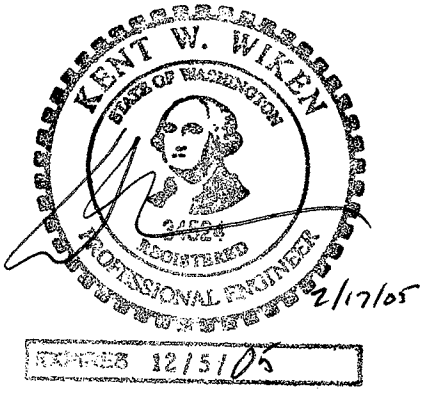
Signature: _____

Certification Date: February 17, 2005

PE Registration Number: 34524

PE Registration State: Washington

PE Engineering Seal:



3.0 General Information

3.1 Purpose of the SPCC Plan

This SPCC Plan was prepared to satisfy the applicable requirements under 40 CFR Part 112. The complete 40 CFR Part 112 regulations are provided in Appendix E. The purpose of this written plan is to prevent the spill and discharge of oil products (e.g., petroleum) into navigable waters (e.g., streams, creeks, rivers, and lakes) of the United States and to the underlying aquifer. The SPCC Plan also addresses the spill response procedures and actions that must be implemented if a spill does occur at the City of Arlington Municipal Airport (Airport).

The Airport is subject to the SPCC Plan requirements because the Airport and its tenants store more than 1,320 gallons on aggregate of new and used oil above ground (includes only those containers with storage volumes of 55 gallons or greater). The determination of whether the Airport has the potential to store more than 1,320 gallons of oil is based on the following containers: used oil aboveground storage tanks (AST), new oil ASTs, above-ground fuel tanks, mobile fuel and oil tanks, and used cooking oil/grease ASTs associated with restaurants.

The SPCC Plan does not need to be submitted to the U.S. Environmental Protection Agency (USEPA) unless requested. However, a copy of the current SPCC Plan for the facility must be available on site during normal business hours.

This SPCC Plan includes a completed "Applicability of the Substantial Harm Criteria" form in Appendix A. This completed form indicates that the facility does not pose a substantial harm (risk) to the environment.

3.2 Definitions

A complete list of definitions pertaining to the SPCC regulation is provided in 40 CFR part 112.2 (See Appendix E); however, some definitions are added or expanded upon here as they pertain to the Arlington Airport:

- **AST** – Above-ground storage tank; these refer to all non-buried storage tanks for containing liquids and include oil drums, totes, fixed tanks and mobile tanks (e.g. fuel trucks).
- **Container size, Storage Capacity** – For purposes of this SPCC plan all containers with the shell capacity to store 55 gallons or more of oil or oil products must be included in the SPCC Plan, have secondary containment, and have spill countermeasures. In addition, the international fire code (IFC) requires that all fuels (Class 1a liquids) stored in quantities 30 gallons or more have secondary containment. Any Airport tenant with an aggregate above-ground storage capacity of 1,320 gallons

(adding all of the storage containers 55 gallons or above), or an underground storage capacity of more than 42,000 gallons is required by 40 CFR 112 to have their own SPCC plan specific their facility.

- **IFC** – International Fire Code (2003)
- **Oil, Oil Products,** – This SPCC plan pertains to the spill prevention, controls and countermeasures for oil products only. Following the definition of "oil" in 40 CFR 112.2, "Oil means oil of any kind or any form including, but not limited to: fats, oils or greases of animal, fish or marine mammal origins, vegetable oils, including oils from seeds, nuts, fruits, or kernels; and other oils and greases including petroleum, fuel oil, sludge, synthetic oil, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil." It should be noted that storm water or other waste water with any oil product within should be considered and handled as oil.
- **Secondary Containment** – A redundant storage vessel constructed around the oil storage container to contain any spills in the event of the oil storage container leaking or rupturing. As required in 40CFR 112.8(c)(2), all oil storage containers must have a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. The secondary containment must be made of oil compatible materials and sufficiently impervious to contain discharged oil. For oil drums, spill pallets are typically employed for this purpose. For larger containers, concrete, steel or plastic lined dikes, containment curbs and pits are commonly employed.
- **Spill, Discharge** – includes, but not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil which could reach the waters of the United States. For purposes of this plan "Waters of the United States" include river, streams, wetland, ponds, lakes, underlying aquifers, and storm water conveyances that are connected to natural surface water or groundwater without treatment to remove the oil (e.g. oil-water separator). This does not include discharges allowed under the National Pollution Discharge Elimination System (NPDES) permit for the site.
- **UST** – Underground Storage Tank for storage of oil products; are not subject to the requirements of the SPCC regulations unless the total UST container storage capacity is greater than 42,000 gallons. Generally, tenants with USTs larger than 110 gallons are subject to the technical requirements of 40 CFR 280 and WAC 173-360-315. Per 40 CFR 280.3(a) and WAC 173-360-315(1): Owners and operators (of USTs) must ensure that releases due to spilling or overfilling do not occur. The owner and operator must ensure that the volume available in the tank is greater than the volume of product to be transferred to the tank before the transfer is made and that the transfer operation is monitored constantly to prevent overfilling and spilling.

3.3 Conformance with Applicable Requirements

3.3.1 Federal SPCC Requirements

This SPCC Plan has been prepared in accordance with the 40 CFR Part 112 and good engineering practices. In conforming to all applicable requirements of 40 CFR Part 112, no

deviations are employed or claimed in the SPCC Plan unless noted as an Equivalent Environmental Protection (Section 3.3). In accordance with 40 CFR Part 112.7, the table at the end of this section provides a cross-reference to all applicable requirements.

In addition, 40 CFR 112.7 requires that additional facilities, procedures, methods, or equipment not yet fully operational must be discussed in this SPCC Plan. This discussion must include details regarding installation and operational startup. Therefore, the following general activities must be completed prior to the Airport being in full conformance with the SPCC Plan requirements:

1. The tanker trucks or other mobile oil storage tanks larger than 55 gallons at the Airport must be parked in an area that has secondary means of containment in the event of a spill or leak during non-business hours. In addition, the tanker truck parking area must have security measures to prevent vandalism of the tanker trucks. Based on discussion with USEPA regional SPCC Program Coordinators (and their current interpretations), this does not include aircraft. Mobile oil storage tank parking area(s) with secondary containment is required by 40 CFR 112.8(c)(11), and will need to be constructed. This secondary containment could include a fenced and roofed area with curbing, or a paved area with catch basins that discharge to a containment structure (pond or oil-water separator sized to contain the largest individual container). All means of secondary containment will be subject to regular inspections and maintenance to insure proper working order.

2. Several oil storage ASTs and portable drums do not have sufficient or any secondary means of containment as required by 40 CFR112.8(c)(2). This situation can be mitigated by placing oil storage tanks on spill pallets or constructing a paved secondary containment around these ASTs with sufficient capacity to hold the largest single compartment or container.

3. Several tenants do not have sufficient or any countermeasures for discovery, response, and cleanup of an oil/oil product spill as required by 40 CFR 112.7 (a)(3)(iv).

The specific corrective actions recommended for SPCC Plan compliance at each tenant location are listed in Table 1 of this plan.

With the corrective actions implemented, this facility will be in conformance with all applicable requirements under 40 CFR Part 112 through the implementation and maintenance of this SPCC Plan.

3.3.2 Applicable Washington State, County, and City Rules and Regulations

This facility is currently exempt from Washington State *Facility Oil Spill Prevention Plan Standards* provided in Washington Administrative Code 173-180D, and *Facility Contingency Plan and Response Contractor Standards* because the Airport does not meet the definition of a

"Facility" under these codes. This plan is, however, in general compliance with these state requirements.

The Airport is located over a drinking-water aquifer subject to the wellhead protection regulations in WAC 246-290-135(3) administered by the Washington Department of Health. This plan identifies the potential oil contamination sources as a required component of the wellhead protection program.

The facility is also subject to the International Fire Code (IFC) adopted by the City of Arlington Fire Department. As such, all spills of any size must be reported to the fire department, and secondary containment is required for fuel (Class 1a liquids) storage containers greater than 30 gallons and oil or used oil (Class 3b liquids) storage containers greater than 13,000 gallons.

3.3.3 Airport SPCC Plan Cross-Referencing Table

All of the above requirements have been incorporated into the applicable sections of this SPCC Plan and summarized the chart below. Any deviation from these requirements may require a revision to this SPCC Plan.

As per 40 CFR 112.7, the following table cross provides a reference for the SPCC Plan contents as required in 40 CFR 112.

SPCC Rule 40 CFR 112	Description of Section	Plan Section
112.7	Management Approval	1.1
112.5	SPCC Plan Review and Amendment	1.2
112.3(d)	Engineer Certification	2.0
112.7	General Requirements	3.0 through 6.0
112.7(a)(1) and (a)(2)	Conformance with Applicable Requirements; Deviations from Plan Requirements – Equivalent Environmental Protection	3.0
112.7(a)(3)	Facility Description and Site Layout	4.1, Site Map
112.7(a)(3)(i)	Type of Oil and Storage Capacity	4.1, Table 1
112.7(a)(3)(ii)	Discharge Prevention Measures	Table 1
112.7(a)(3)(iii)	Discharge Drainage Controls as Secondary Containment	4.2, Table 1
112.7(a)(3)(iv)	Countermeasures for Discharge Discovery, Response, and Cleanup	5.0, Table 1
112.7(a)(3)(v)	Methods of Disposal of Recovered Materials	6.3
112.7(a)(3)(vi)	Contact List and Phone Numbers	6.0, Appendix B
112.7(a)(4)	Discharge Reporting Information	6.1
112.7(a)(5)	Organization of Response Procedures	6.2, Appendix C

SPCC Rule 40 CFR 112	Description of Section	Plan Section
112.7(b)	Potential Spill Prediction Information	Table 1
112.7(c)	Containment and Diversion Structures or Equipment	6.2
112.7(d)	Oil Spill Contingency Plan	N/A
112.7(e)	Inspections, Integrity Testing and Recordkeeping Practices	5.2
112.7(f)	Personnel Training, and Discharge Prevention Procedures	5.3
112.7(g)	Security	5.4
112.7(h)	Facility Tank Car and Truck Loading/Unloading Rack	5.1
112.7(i)	Field-constructed Aboveground Container Repair	N/A
112.7(j)	Applicable State Rules and Regulations	3.2
112.8(a)	General Requirements	3.0 through 6.0
112.8(b)(1)	Drainage from Diked Storage Areas	5.1
112.8(b)(2)	Valves to Control Drainage in Diked Storage Areas	5.1
112.8(b)(3)	Drainage from Undiked Areas	5.1
112.8(b)(4)	Discharge from Ditches	5.1
112.8(b)(5)	Drainage from Treatment Systems	N/A
112.8(c)(1)	Bulk Storage Container Material of Construction	Table 1
112.8(c)(2)	Bulk Storage Container Secondary Containment	Table 1
112.8(c)(3)	Bulk Storage Container Area Drainage	5.1
112.8(c)(4)	Completely Buried Metallic Tank Cathodic Protection	N/A
112.8(c)(5)	Partially Buried Metallic Tank Cathodic Protection	N/A
112.8(c)(6)	Integrity Test Aboveground Containers	5.2.2
112.8(c)(7)	Leak Control of Heating Coils	N/A
112.8(c)(8)	Discharge Prevention Devices.	3.3
112.8(c)(9)	Inspection of Effluent Treatment Systems	5.1
112.8(c)(10)	Visible Discharges/Accumulation of Oil	5.1
112.8(c)(11)	Mobile or Portable Storage Containers *(Note: all mobile & portable storage containers > 55 gallons)*	3.2.1, 4.1.2
112.8(d)(1)	Transfer System Buried Piping	N/A
112.8(d)(2)	Transfer System Terminal Connection	N/A
112.8(d)(3)	Transfer System Pipe Supports	N/A
112.8(d)(4)	Transfer System Inspection of Aboveground Piping	N/A
112.8(d)(5)	Transfer System Security	N/A

SPCC Rule 40 CFR 112	Description of Section	Plan Section
112.20	Facility Response Plans – General Requirements	N/A
112.20(e)	Facility Response Plans – Certification of the Applicability of the Substantial Harm Criteria	Appendix A

3.4 Equivalent Environmental Protection

In accordance with 40 CFR Part 112.7(a)(2), a facility may deviate from certain aspects of the SPCC Plan requirements provided that equivalent environmental protection and good engineering practices are achieved through other means of spill prevention, control, or countermeasure. For this facility, the equivalent environmental protection includes:

- Equivalent controls in lieu of the specific catch basin/quick-drainage system for loading and unloading areas required by 40 CFR 112.7(h). The Airport and tenants contract with suppliers that operate tanker trucks to deliver new oil and pickup used oil in bulk. Based on discussions with USEPA regional and headquarter SPCC Program Coordinators (and their current interpretations), a "quick drainage system" is not required in the loading and unloading areas of this type (USEPA states that quick drainage systems are only required at unloading and loading racks/terminals, not unloading and loading areas). The Airport, tenants, and oil delivery/pickup suppliers will provide prevention and control measures per 40 CFR 112.7(c) in these loading and unloading areas through specific procedures provided in Section 5.0 of this SPCC Plan.

- Equivalent overflow protection in lieu of the specific devices listed in 40 CFR 112.8(c)(8). The filling of ASTs with new oil products will be observed by trained Airport personnel, tenant representatives, and/or suppliers using direct vision gauges installed on the tanks or observation of the liquid during filling per 40 CFR 112.8(c)(8)(iv). In addition, all oil transfers will take place over paved areas such that in the event of a spill, the pavement combined with proper use of a spill kit would sufficiently contain the spill for cleanup.

3.5 Penalties for Noncompliance with SPCC Plan Requirements

The SPCC plan requirements are enforced by the USEPA. Pursuant to Section 311(b) of the Clean Water Act, as amended by the Oil Pollution Act of 1990, 33 U.S.C § 1321(b), violations of the SPCC regulations in 40 C.F.R. Part 112, subject owners and operators of a facility to administrative civil penalties of up to $11,000 per day (up to a maximum of $137,500) or judicial civil penalties of up to $27,500 per day. In addition to these federal penalties, the City of Arlington lease agreement requires that all tenants abide by state and federal regulations, and therefore may revoke lease agreements for tenant noncompliance with the SPCC regulations.

4.0 Facility Information

4.1 Description of Facility and Tenants

The Airport office is located at 18204 59th Drive NE, Arlington, Washington 98223, and has approximately 170 tenants on its property. The site was purchased by the U.S. Navy in 1941. The Navy owned and operated the Airport and surrounding site property until the city assumed possession in 1959. The site covers approximately 1,180 acres and includes aircraft hangars, offices, storage buildings, manufacturing buildings, commercial buildings and maintenance buildings (see attached site plans). The runways, taxiways, and parking areas are completely paved with asphalt and concrete, with catch basins to collect stormwater runoff. Portage Creek and Kruger Creek, tributaries to the Stillaguamish River, are the closest navigable waters, located within approximately 0.25 miles north and east of the Airport property.

For purposes of this plan, Airport facilities can be classified under four categories based on their services and use or storage of regulated oil products. The four categories are: (1) City of Arlington Operations; (2) Services Tenants; (3) Industrial Tenants; and (4) Commercial Tenants. All tenants use leased space, owned by the City of Arlington. The attached site plans provide a facility diagram required for this plan, and include the location of each applicable oil products container/equipment at the facility, the oil products loading and unloading areas, the location of the nearest stormwater catch basin(s), and the general drainage flow pattern to the nearest stormwater catch basins off-site.

4.1.1 City of Arlington Operations

Facilities operated by City of Arlington personnel fall under this category. The primary uses of these facilities include storing and maintaining city vehicles and equipment, such as tractors, mowers, street sweepers, law enforcement vehicles, and construction equipment. The city operations include garages; sheds; or secured, designated parking areas used for storage and parking of maintenance equipment and raw materials. Typical products regulated under 40 CFR 112 that would be stored on site include oil, hydraulic oil, and used oil. These products are frequently stored in 55-gallon steel/plastic drums and ASTs up to 200-gallon capacity.

4.1.2 Services Tenants

Facilities that provide refueling, maintenance, and storage services fall under this category. The primary uses of these facilities include storing and maintaining vehicles and equipment, such as automobiles and airplanes. They may also offer product and fueling services, such as gasoline stations and mobile oil tanker trucks. These facilities have a garage; hangars; and secured, designated parking areas used for maintaining and parking aircraft and vehicles. Typical products regulated under 40 CFR 112 that would be stored on site include fuel, oil, and used oil.

These products are stored in 55-gallon steel/plastic drums, ASTs up to 12,000-gallon capacity, fueling trucks up to 4,500-gallon capacity, and USTs up to 15,000-gallon capacity.

4.1.3 Industrial Tenants

Facilities that provide manufacturing services fall under this category as well as the school district bus parking. The primary uses of these facilities include manufacturing of parts and equipment, such as machined aircraft parts, engines, and infrastructure materials and parking for trucks and buses. The facilities may have a garage; shed; or secured, designated parking area used for operation and construction. Typical products regulated under 40 CFR 112 that would be stored on site include fuel, oil, hydraulic oil, used oil, and coolant/cutting oil. These products are frequently stored in 55-gallon steel/plastic drums, ASTs up to 500-gallon capacity, and mechanical equipment with oil and/or fuel tanks up to 80-gallon capacity.

4.1.4 Commercial Tenants

Facilities that have oil products in containers that are less than 55 gallons in volume fall under this category. The primary uses of these facilities vary. Products are frequently stored in drums or containers with a capacity smaller than 55 gallons. These facilities do not require an SPCC Plan and are exempt from regulation under 40 CFR 112. However, the Airport strongly encourages that commercial tenants implement environmental management practices that prevent hazardous material and oil spills.

4.2 Oil Products Storage Summary and Potential Spill Prediction Information

Table 1 provides content and storage capacity of containers on site and reasonable spill scenarios that could occur at each facility. The table also includes the potential rate of release for each scenario. The attached site plans show the general location of containers, their loading and unloading areas, and the direction of flow/containment if failure of an oil products storage container/equipment occurred. A brief description of the types of oil storage at the Airport is provided in the following paragraphs.

4.2.1 Aircraft

Numerous aircraft are parked on the flight line, many of which have fuel tanks that exceed 55 gallons in capacity. Based on discussion with the USEPA regional SPCC Program Coordinator, parked aircraft are not required to have a means of secondary containment. As discussed further in Section 5.0, however, spill countermeasures are required to be in place prior to and during the fueling or loading of oil into the aircraft.

4.2.2 Drums and ASTs

There are multiple drums and ASTs at the Airport for storage and collection of new and used oil (hydraulic, lube, and motor oil) and fuel (gasoline, Jet A, and aviation) generated from facility

operations and maintenance. The locations of these tanks vary and are shown on the site plans. All tanks are above ground, ranging from 30 to 12,000 gallons in capacity. Tanks may be single- or double-walled storage tanks located indoors or under a roof structure. The tanks rest on a concrete foundation and may be surrounded by a concrete berm or may have another form of appropriate secondary containment. Tanks are secured inside or with a padlock gate or cover if applicable. For individual drums, secondary containment is typically provided by placing the drums on a "spill pallet." The spill pallet is a portable plastic grate over a plastic bin that is specifically designed to store up to four drums each, with the secondary storage capacity to contain the contents of one drum.

4.2.3 Mobile Oil Storage for Aircraft Fueling

Some service tenants have mobile oil storage in the form of aircraft fuel tanker trucks and trucks with oil storage tanks in the beds. The mobile oil storage tanks range in capacity from 55 gallons up to 4,500 gallons. The mobile oil product trucks travel the flight line, and have trained oil-handling personnel and spill kits on board to properly fuel the aircraft and provide effective countermeasures in the event of a spill. During non-operating hours these tanker trucks will be parked on a paved surface and within a secured area. These parking areas are being upgraded to prevent discharge from the paved parking areas in the event of leak or spill and will also include fencing, lighting and/or other security measures. The parking areas will provide a secondary means of containment such as dikes, curbs, or catchment basins sufficient to contain the capacity of the largest single compartment or container to be placed in the parking area. If the upgraded parking area is not covered, it will be designed to have sufficient freeboard to contain precipitation. Once constructed, the secondary containment areas will be inspected, monitored and discharge of stormwater documented as discussed in Section 5.1 of this plan.

4.2.4 Underground Oil Product Storage

There are some fuel service tenants with underground storage tanks (USTs) ranging in capacity from 5,000 to 15,000 gallons. These fuel service stations must meet the technical requirements under 40 CFR 280, and applicable state program under WAC 173-360-315 which are different from the SPCC plan requirements outlined in 40 CFR 112. As required under 40 CFR 112.1(d)(4), the attached site plans do indicate the general location of the fuel USTs at the Airport.

4.2.5 Equipment Tanks

Lube oils, hydraulic oils, and fuels used by various tenants are stored in equipment tanks and hydraulic lines in quantities up to 80 gallons. Non-portable equipment generally has secondary containment below the storage tanks. Mobile equipment has spill kits within the tenant operations or on board to provide effective countermeasures in the event of a leak or spill of oil products.

4.3 Facility Response Plan

The Airport does not require a Facility Response Plan because it does not meet the substantial harm criteria. See Appendix A for the substantial harm criteria certification.

5.0 Spill Prevention Measures

City of Arlington personnel who handle oil and fuels are trained yearly in spill prevention requirements for the Airport. The Airport tenants are made aware of spill and leak prevention general requirements through the mailings sent, offering training, and site visits.

5.1 General Oil Handling Procedures

Facility operations are performed in a manner to prevent leakage and spills of oils, fuels and other oil products. Spill prevention techniques include the following general practices, which must be followed by the City of Arlington personnel and all Airport tenants (collectively described as "Facility personnel" in the following paragraphs):

- Facility personnel are encouraged to inspect the tanks daily for leaks from piping, tank seams, valves, fittings, gaskets, rivets, and bolts.
- Facility personnel will visually inspect tanks, berms, valves, and pumps monthly, and a record of the inspection (Appendix D) will be maintained at the facility for a period of three years.
- Facility personnel will visually inspect the interior of the tanks annually, and a record of the inspection will be maintained at the facility for a period of three years.
- Each tank will be equipped with a gauge to monitor oil levels and with vents adequate for fill and withdrawal rates, or it must be shown that visual observations by oil-handling personnel during filling are adequate overfill protection.
- The main outlet valve on each tank will be locked shut when the facility is unattended.
- Receiving funnel and pipe connections as well as withdrawal standpipe or discharge ports will be capped and locked when not in use.
- Facility personnel are encouraged to inspect standing water collected within the secondary containment areas daily for an oily sheen. Any oil will be removed by means of absorbent material, which will be properly disposed of or pumped to a container and disposed of to a used oil vendor. If no oily sheen is present, the containment area may be drained. If oil sheen is present, the water will be pumped or containerized for disposal by appropriate means. The drainage of secondary containment areas needs to be documented per 40 CFR 112.8(c)(3)(iv) and the records kept on site for at least three years.
- Valves to control drainage from secondary containment areas will be unlocked and opened only after the standing water has been inspected under SPCC-trained City of Arlington supervision.
- A supply of oil-absorbent material will be kept on hand for cleanup of small spills.

- Bollards located around the perimeter of the oil and fuel tanks prevent accidental vehicle impacts and potential rupturing of the tanks.

- When not in use, tanker trucks must be locked and secured on sufficiently impervious surfaces which will contain discharged oil or fuel. These parking areas will also be curbed or equipped with a sump to contain the single largest tank or compartment of the tank that could be discharged due to tank leaking, rupture or vandalism.

5.1.1 Filling of Drums and ASTs

Trained oil-handling personnel will perform the filling of oil and fuel storage tanks to ensure proper filling procedures are followed. Filling procedures include checking tank level sight gauges prior to filling; the potential for overflow is minimized by not filling the tanks to full capacity. The SPCC-trained personnel will transfer the product into the drums or AST(s) by pneumatic/electric pumps, gravity flow, and/or pouring. The person filling the AST must be careful not to overfill the tank, using direct visual gauges or high liquid level alarms. Storage containers must be equipped with a funnel or similar device to reduce spills during filling.

Secondary containment should be constructed around all drums or tanks with a capacity for 100 percent of the contents of the largest tank within the secondary containment. If applicable, storage containers should be equipped with a pressure relief valve to reduce a buildup of pressure, which could cause leaks. Sorbent supplies, such as granular materials and absorbent pads, should be on hand to clean up any spills that occur during fill procedures (see Section 6.2 for spill kit contents). The area near the storage tanks should be kept neat and clean. When a used oil tank is full, or at scheduled intervals, a used oil vendor will come to the facility to pick up the used product.

Used product from operation and maintenance is collected in containers by the various tenants. Only hangar tenants who are trained oil-handling personnel may transfer used product to the City of Arlington used oil ASTs at the facility, or by contacting a used oil vendor directly that they need to dispose of the used oil. When the City's used-oil tanks are full, the contents are removed or pumped into a tanker truck provided by a used-oil vendor for removal off site. The used-oil vendor will park the tanker truck outside the building on the paved area (the site plans show the approximate locations of the loading and unloading areas).

5.1.2 Emptying of Used Oil Product Drums and ASTs

Prior to emptying drums and ASTs, all valves or openings must be examined for leakage. All tank main flow valves must be securely locked in the closed position except during emptying the contents. Used oil product transfers from the ASTs must be monitored by trained oil-handling personnel. Signs describing proper removal practices must be posted near each applicable AST.

The procedure below will be followed to prevent an oil spill or discharge during the transferring and loading of used product from the ASTs to a used oil product vendor tanker truck:

1. The vendor will check in with the tenant, and the tenant will provide access to the used oil AST(s).

2. The vendor will park the tanker truck at the designated loading area and chock the tires.

3. The facility personnel will use the spill response equipment (i.e., spill kit; see Section 6.2) to control any minor spills that may occur during the loading process.

4. The vendor will temporarily cover the nearest outside catch basins, which could reasonably receive oil in the event of an oil spill during loading (recognizing absorbent materials are also available if needed). The temporary cover shall consist of a rubber mat or like product that will preclude oil entry into the drains. The vendor then will attach the hose to the used oil AST to begin the loading (vacuum pumping) process.

5. During the loading process, the vendor will visually monitor the liquid level in the tanker truck and shut off the flow when the AST is emptied.

6. After the used product loading process is completed, the vendor will drain the hose into the tanker truck (or, if necessary, into a portable container).

7. The drain/removal port on the used product ASTs will be closed.

8. The vendor will prepare the tanker truck for departure. The supplier will check for any oil drips or leaks from under the tanker truck. If any oil drips or leaks are observed, the vendor will take corrective actions to stop the drips or leaks. Prior to signing the vendor manifest and allowing the supplier to leave the site, the facility personnel will also inspect the loading area for any oil drips or spills that occurred during the loading process. If any drips or spills occurred, the vendor or facility personnel will clean up the spill and properly dispose of the residue. The vendor will then remove the wheel chocks and leave the facility.

9. The facility personnel will restock or order any materials used from the spill response equipment (i.e., spill kit).

5.1.3 Fueling Operations

Trained oil-handling personnel must monitor the fueling of aircraft, vehicles, and equipment as well as the filling of the fuel USTs to ensure proper filling procedures are followed and the tanks are not overfilled. The procedure below will be followed to prevent a fuel or oil spill or discharge during the transferring and loading of fuel:

1. The supplier will park the tanker truck at the designated unloading area and chock the tires.

2. The tenant will use the spill response equipment (i.e., spill kit; see Section 6.2) to control any minor spills that may occur during the unloading process.

3. The tenant will temporarily cover the nearest outside catch basins, which could potentially receive fuel or oil in the event of an spill during loading (recognizing that absorbent materials are also available if needed). The temporary cover shall consist of a rubber mat or like product that will prevent oil from entering the drains. The supplier then will attach the hose to the storage tanks to begin the unloading process.

4. During the fueling process, the supplier will visually monitor the liquid level in the storage tanks and shut off the flow when the storage tanks are filled.

5. After the unloading process is completed, the supplier will drain the hose into the tanks (or, if necessary, into a portable container).

6. The fill port on the tanks will be securely closed.

7. The supplier will prepare the tanker truck for departure. The supplier will check for any drips or leaks from under the tanker truck. If any drips or leaks are observed, the supplier will take corrective actions to stop the drips or leaks. Prior to signing the supplier manifest and allowing the supplier to leave the site, the tenant, aircraft owner, or vehicle owner will also inspect the unloading area for any oil drips or spills that occurred during the unloading process. If any drips or spills occurred, the supplier will clean up the spill and properly dispose of the residue. The supplier will then remove the wheel chocks and leave the facility.

8. The fuel supplier will restock or order any materials used from the spill response equipment (i.e., spill kit).

5.2 Inspections, Integrity Testing, and Recordkeeping Practices

The facility will conduct monthly inspections to confirm the SPCC Plan is being properly implemented and maintained. These inspections will cover all applicable oil product ASTs and associated piping connections for evidence of leakage and deterioration. The inspection procedures include: (1) an inspection of all secondary containment structures and interstitial spaces on double-walled ASTs for the presence of water or oil (if equipped or accessible); (2) a visual inspection of the tank exterior for damage and corrosion; (3) an inspection and cleaning of the normal operating and emergency vents on the ASTs (if equipped); (4) a check of the O-ring/gasket on the emergency vents (if equipped); and (5) an inspection of the tank supports/foundations for signs of deterioration. As required by 40 CFR 112.8(c)(6), the ASTs must be tested using a non-destructive testing method.

5.2.1 Monthly Inspections

The monthly inspection procedures will be performed by SPCC-trained personnel and will include:

- Inspecting all secondary containment structures and interstitial spaces on double-walled ASTs for the presence of water or oil (if equipped or accessible).
- Visually inspecting the tank exterior for damage and corrosion.
- Inspecting and cleaning the normal operating and emergency vents on the ASTs (if equipped or accessible).
- Inspecting the tank supports/foundations for signs of deterioration.

In addition, the monthly inspections will verify that spill control equipment is available at the facility. The monthly SPCC Plan inspection checklist is provided in Appendix D. The monthly inspection records will be maintained on site for a minimum of three years and copies will be made available to the City of Arlington upon request.

5.2.2 AST Integrity Testing

In addition to the visual tank inspections, periodic integrity testing will be performed on the ASTs used for storing used oil, new oil products, and fuel. The Steel Tank Institute Standard SP001-01 recommends that steel ASTs storing flammable and combustible liquids be tested at least every 10 years. In addition, a certified and licensed tank inspector must perform this non-destructive test. The tank owners will perform the non-destructive testing (at least every 10 years) using a certified and licensed tank inspector. The non-destructive integrity testing records will be maintained for the most recent test performed for comparison with future testing activities. All records of the most recent AST integrity testing shall be maintained on site and copies will be made available to the City of Arlington upon request.

5.3 Personnel Training

All oil-handling personnel will be trained in spill prevention, containment, and countermeasure procedures and will be familiar with applicable pollution control laws, rules, and regulations. Discharge prevention will be reviewed at least once per year by the Facility Spill Prevention Representative (identified on page 1-1 of this plan) to ensure adequate understanding of the SPCC Plan for that facility. All facility personnel must be instructed in the following practices:

- Use of appropriate personal protective equipment (PPE) for protection during handling oil products.
- Checking tank levels before filling tanks.
- Attending pump operations continuously.

- Displaying warning signs instructing personnel to check for disconnection before vehicles depart.
- Promptly correcting visible discharges that result in a loss of oil from any container or diked area.
- Maintaining equipment to prevent oil discharges and spill incidents.
- Facility personnel participating in a practice drill for an on-site spill event including spill prevention, containment, and clean-up methods.
- Posting instructions and emergency phone numbers for reporting a spill to the USEPA and the Washington State Department of Ecology (Ecology) at the office.
- Ensuring a copy of the SPCC Plan with updated inventory of tanks and site plans is located at the Airport office and is accessible to all personnel.

5.4 Facility Security

The tank area is secured by fencing and/or locked valves. The tank will be opened only when a truck is unloading/loading or when the SPCC-trained oil-handling personnel are present. In addition:

- Any tank valves, such as water draw valves, which permit direct outward flow of a tank contents, are locked in a "closed" position when in non-operating or standby status. Oil and fuel storage tank valves are locked closed when the site is unattended.
- Starter controls on all oil pumps in non-operating or standby status are locked "closed" and installed at a location accessible only to authorized personnel.
- All loading/unloading connections are capped or blank flanged when the facility is unattended.
- The lighting for the facility consists of street and flood lights located on or near buildings. The lighting is adequate and must be maintained for facility operations and spill response.
- The Airport is monitored 24 hours per day by the City of Arlington.

6.0 Reporting, Containment, and Cleanup

If an oil product spill occurs, the tenants of the Airport will follow the emergency spill response, cleanup, and reporting procedures provided in this section.

As required by the IFC, all spills will promptly be reported by the Airport tenant to the City of Arlington Fire Department at 911 (for non-emergencies dial [360] 403-3600) and the Arlington Airport at (360) 403-3470.

If the spill cannot be cleaned up by tenant personnel on site, is 1,000 gallons or more, discharges into the soil **or** if the oil product spill is discharged into a stormwater catch basin, then upon the tenant notifying the Arlington Airport, the Airport will promptly notify the City of Arlington Environmental Department at (360) 403-3440, and the Arlington Police Department, 911 (for non-emergencies dial (360) 403-3400).

The City of Arlington Airport or Environmental Department will also notify:

- National Response Center, Washington D.C., (800) 424-8802
- USEPA – Region 10, (206) 553-1671
- Ecology (Bellevue office), (425) 649-7000
- The City of Arlington Administrator, (360) 403-3443

If assistance with the cleanup is needed, the following environmental services are available:

- National Response Corporation (NRC); (800) 337-7455
- Wyser Construction; (425) 742-0898
- Glacier Environmental; (425) 355-2826
- Emerald Services; (206) 795-0916

6.1 Reporting

6.1.1 Information to Report in the Event of a Discharge

The tenant will report the following information (per 40 CFR 112.7(a)(4)) to the federal, state, and local regulatory agencies listed above (and in Appendix B) if a spill occurs that enters a stormwater catch basin or flows off site:

- Address and phone number
- Date and time of spill/discharge

- Type and quantity of material spilled
- Quantity of material spilled into a stormwater catch basin and/or flowed off site
- The source of the spill/discharge, description of all affected media (e.g., soil, water, wetlands), and the cause of the discharge
- Damage or injuries caused by the discharge
- Actions taken to stop, remove, and mitigate the effects of the discharge
- Whether an evacuation is needed
- Names of individuals and/or organizations who have been contacted

Per 40 CFR 112.4, if a spill of more than 1,000 gallons or two spills of more than 42 gallons, each within a 12-month period, occurs that enters a stormwater catch basin or flows off site and enters navigable waters of the United States, the facility will submit the following information to the USEPA within 60 days of the spill:

- Facility name and location
- Name of the person submitting the report
- Maximum oil storage or handling capacity of the facility and normal daily throughput
- Corrective action and countermeasures taken (including a description of equipment repairs and replacement)
- An adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary
- The cause of the spill/discharge as described in 40 CFR 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence
- Such other information as the Regional Administrator (i.e., USEPA) may reasonably require pertinent to the SPCC Plan or discharge

6.2 Containment and Cleanup

Each tenant with fuel/oil containers 55 gallons or greater will have a spill response kit located at each tank location. The standard spill response equipment (i.e., spill kit) will contain at least:

- Oil-absorbent material (granular absorbent, absorbent pads, and absorbent socks)
- Large plastic bags
- Broom

- Dustpan
- Temporary drain covers for catch basins in the area (e.g., rubber mat or like product)

In the event of a spill, the tenant should take immediate action to stop the source of the spill and to contain the migration of spilled substance. Next, the authorities and agencies should be notified to ensure an expedited cleanup. In the event of a spill, the following steps should be taken:

1. Act to stop the flow of product by:
    a. Shutting off the main control valves on the tank.
    b. Turning off the pumps. Do not start pumps or nearby vehicles.
    c. Closing valves on sumps.
    d. Lowering the product level to below the ruptured area (if a tank is ruptured).
2. Cover all drains to block access to adjacent catch basins.
3. Use oil-absorbent granules, pads and/or socks to begin containment and cleanup.
4. Report the spill to the City of Arlington Airport and the agency notifications listed above.

See Appendix C for a flowchart of Spill Response Actions.

6.3 Disposal of Recovered Materials

Because potential spills can be of a widely varied nature, the range of remedial actions will vary.

For small spills, leaks, or drips, the remedial action may be as simple as removing the contaminated material (whether dirt, booms, or other absorbents) and placing them in an approved container for subsequent treatment or disposal.

A large spill, on the other hand, could result in an extensive cleanup of soil, groundwater, and surface water and may require a specific cleanup action required by Ecology. In the event of a major spill, an environmental contractor should be notified to clean up the spilled material.

Site Plans

(Plans located at Airport office)

Table 1
Storage Tank Inventory

(Table located at Airport office)

Appendix A
Applicability of the Substantial Harm Criteria

Facility Name: City of Arlington Municipal Airport
Facility Address: 18204 59th Drive NE, Arlington, Washington 98223

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?
No

Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient free board to allow for precipitation within any aboveground oil storage tank area?
No

Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR 112) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
No

Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR 112) such that a discharge from the facility would shut down a public drinking water intake?
No

Does the facility have a total oil storage capacity greater than or equal to 1 million (1,000,000) gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?
No

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.

Rob Putnam, Airport Manager

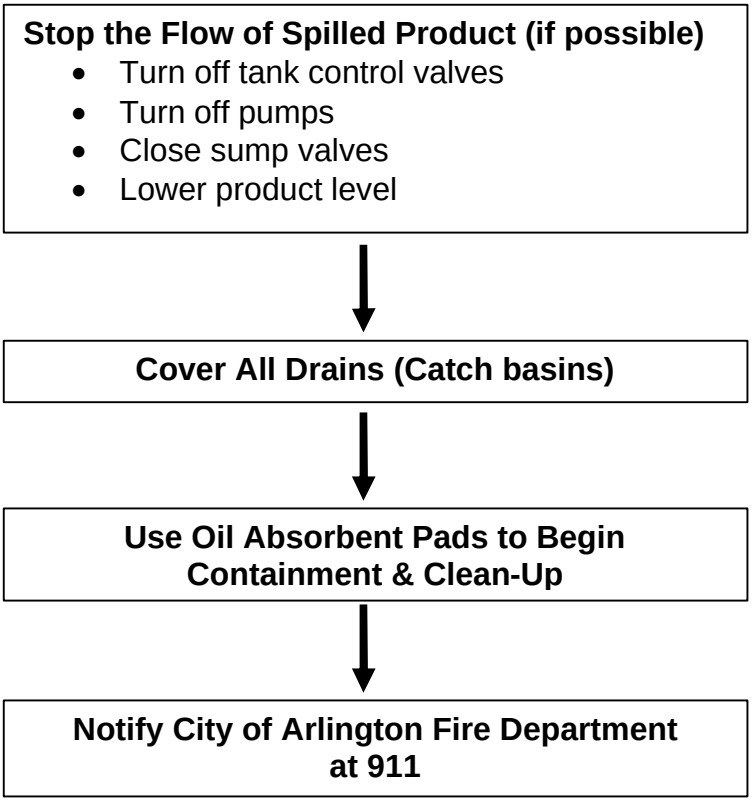
Date

Appendix B
Contact List

Name	Agency	Daytime
For ALL SPILLS contact:		
Rob Putnam	Arlington Airport	(360) 403-3470
	Arlington Fire Department	911 or for non-emergencies dial (360) 403-3600
For any spill that discharges off-site, into soil, catch basins or a large spill (more than 1,000 gallons), promptly contact the above and the Arlington Airport will contact:		
City of Arlington Environmental Department		(360) 403 - 3440
Arlington Police Department		911 or for non-emergencies dial (360) 403-3400
In addition, the Arlington Airport or Environmental Department will contact:		
National Response Center		(800) 424-8802 (24 hours per day)
USEPA Regional Contact		(206) 553-1671
Washington State Department of Ecology		(206) 649-7000
City of Arlington Administrator		(360) 403 - 3443
Other Useful Phone Numbers to assist in cleanup operations:		
National Response Corporation (NRC)		(800) 337-7455
Wyser Construction		(425) 742-0898
Glacier Environmental		(425) 355-2826
Emerald Services		(206) 795-0916

Appendix C
Spill Response

In the event of a spill, facility personnel should take immediate action to stop the source of the spill and to contain the migration of spilled substance. Next, the authorities and agencies should be notified by the City of Arlington to ensure an expedited cleanup. In the event of a spill, the following steps should be taken:



See Appendix B for a full list of Spill Reporting Contacts.

Appendix D
Monthly SPCC Plan Inspection Checklist

Monthly SPCC Checklist

The following inspection procedure will be performed on a monthly basis to ensure the SPCC Plan is being properly implemented and the applicable ASTs and associated equipment are being properly maintained. A response of "No" to any of the inspection requirement questions below requires corrective action to be taken.

Date:_____ Inspector's Name:_____ Signature:_____

Inspection Question	(Yes/No/NA)	If "No", List: • Corrective Action • Person Responsible • Date for Completion
Are all ASTs, aboveground valves, or piping (including fill and drain pipes, and overhead piping) without (free of) leaks, spills and/or signs of deterioration? If equipped, are all anchor bolts on the ASTs in good condition and properly attached?		
Is the interstitial space between the double-walls of each tank without (free of) oil and water, and the liquid level gauge (if equipped) working properly?		
Are spill kits properly equipped and available in the designated areas?		
Are all gates and fences in the oil storage areas in good condition? All gates, doors and/or tanks equipped with locks to prevent vandalism? All gates, doors or ASTs locked when not in use?		
Is the lighting in the oil storage areas working properly?		
Are the used oil ASTs labeled "Used Oil"? Have you inspected and cleaned the normal operating and emergency vents on the primary and secondary tanks of the AST (if equipped) and replaced vents (and/or their components) if necessary?		
Have you checked to ensure that the O-rings/gaskets on the emergency vents are not damaged or deteriorated and replaced the O-rings/gaskets if necessary?		

Appendix E
40 CFR Part 112
Oil Pollution Prevention Regulations

(Regulation located at Airport Office and on the EPA's Website)

http://www.epa.gov/oilspill/spccrule.htm