

ALLEGANY WIND POWER PROJECT

CONSTRUCTION SPILL PREVENTION PLAN

Best Management Practices (BMPs) will be implemented during construction of the Allegany Wind Power Project to prevent and contain spills. BMPs will be used to reduce the risk of spills and other accidental exposures that could potentially result in impacts to stormwater quality. The workforce will be educated and adequately trained in relation to spill prevention.

The following BMPs will be implemented during all phases of construction to prevent spills, as feasible

1. Construction Material Storage
2. Secondary Containment
3. Leak and Integrity Inspections
4. Fueling and Hazardous Materials Handling
5. Spill Response Materials on Hand
6. Refueling and Maintenance Areas
7. Restricted Activities Areas
8. Spill Response

Each of these BMPs is described below:

Construction Material Storage

The following structural and nonstructural BMPs will be implemented to prevent the direct release of any potentially polluting product (hazardous or nonhazardous) at material storage areas:

- Only enough potentially polluting products required to do a particular job will be brought onto and stored within the site.
- Products will be securely stored only in containers consistent with the manufacturer's recommendations and sized appropriately for the job.
- All storage will occur 100 feet from any surface water (including wetlands).
- No storage will occur within 200 feet of a private water supply well, or within 400 feet of a municipal water supply well.
- All fuel or hazardous material containers of more than 5 gallons will be stored in designated work areas equipped with secondary containment.
- When not in use, all fuel storage tanks will be secured with a lock.
- All product containers will be stored underneath a roof or cover to prevent release of materials during a storm event.
- All product containers should be stored in a neat and orderly fashion, and should be properly labeled. The labels should be visible, correct, and legible.

- The inventory of all MSDSs for each chemical will be available at each storage location. MSDSs will be filed with or otherwise easily accessible to fire departments and other responders.
- Products will be kept in original containers with the original manufacturer's label still affixed. If the original container is not re-sealable, then the product will be transferred to an appropriate, properly labeled container as recommended by the product manufacturer.
- Drain valves on any temporary storage tanks will be locked to prevent accidental or unauthorized discharges.
- Whenever practical, all contents of a container will be used before it is disposed of.
- Any surplus product will be removed from the site as soon as practicable.
- Disposal will be in accordance with the manufacturer's recommendations, label restrictions, and local, state, and federal regulations and/or permit conditions.
- Chemicals that are not compatible (such as sodium bicarbonate and hydrochloric acid) will be stored in segregated areas so that spilled materials cannot combine and react.
- Adequate garbage, construction waste, and sanitary waste handling and disposal facilities will be provided to keep the site clear of obstruction and functional.

Secondary Containment

- Secondary containment will be provided for all containers larger than 5 gallons. Capacity of secondary containment systems will be "at least 100% of the volume of the largest tank" (NYSDEC, 1994) and will include at least 1 foot of freeboard.
- Secondary containment systems are required for smaller tanks (less than 10,000 gallons) which could "reasonably be expected to discharge petroleum to the waters of the State". While not anticipated for this Project, in the event discharge of petroleum occurs, the capacity of secondary containment systems will be "at least 100% of the volume of the largest tank" (NYSDEC, 1994).
- Earthen secondary containment areas will be underlined with plastic sheeting (minimum of 60 mil).
- Polyethylene drum spill skids will be used for storage of 55-gallon drums of fuel or hazardous materials.
- The contractor will construct temporary liners and seamless berms around aboveground bulk storage tanks.
- Secondary containment structures will be constructed as dictated by manufacturer's specifications and/or the construction design drawings. Any accumulated precipitation within the secondary containment structure shall be collected and disposed per NYSDEC regulations.

Leak and Integrity Inspections

The contractor will be responsible for daily leak inspection and for the integrity of all construction equipment and vehicles and material storage areas (including secondary containment structures):

- The contractor will visually inspect aboveground tanks daily, and whenever the tank is refilled.
- The contractor will temporarily patch any visible leaks in tanks immediately. Tanks with leaks will be taken out of service as soon as possible and not be refilled until permanently repaired and tested.
- All onsite construction equipment and vehicles will be inspected for leaks daily.
- Once each week during construction activities, the contractor's site superintendent or his designated personnel will conduct leak and integrity inspections of equipment, vehicles, secondary containment areas (tank and drum storage areas), and spill response supply areas.
- The above leak and integrity inspections will be recorded in a logbook kept at the project field office.

Fuels and Hazardous Materials Handling

Specific procedures and practices will be implemented during construction activities to prevent the release of fuel or hazardous materials. The following nonstructural and structural BMPs will be implemented:

- Fuels and lubricants will be stored only at designated staging areas and in appropriate service vehicles. The storage area will be at least 100 feet from the edge of the nearest water body (including wetlands), at least 200 feet from the nearest private water supply well, and at least 400 feet from the nearest municipal water supply well
- The drivers of fuel delivery trucks are responsible for spill prevention during fuel deliveries/unloading. Procedures for loading and unloading fuel trucks will meet the applicable minimum requirements established by the U.S. Department of Transportation (US DOT). Drivers will observe and control fueling operations at all times to prevent overfilling.
- The drivers of fuel trucks will inspect all outlets of the vehicle before they leave the construction site to prevent leakage while in transit.
- All fuel nozzles will be equipped with functional automatic shut-off valves.
- All storage tank and equipment fuel fill ports will be permanently marked with the correct American Petroleum Institute (API) color symbol.
- Storage tanks 55 gallons and larger will have their secondary containment protected with bollards from accidental impact from vehicles and equipment.
- All pollutants, including waste materials and demolition debris, that occur on-site during construction will be handled in a way that does not contaminate groundwater or stormwater.

- Application of any fertilizers or pesticides will be conducted in a manner and at application rates that will not result in loss of chemical to stormwater runoff. Manufacturers' recommendations will be followed for application rates and procedures. Any fertilizer or pesticide application will be applied by a Commercial Certified Pesticide Applicator in accordance with NYSDEC approved measures.
- PH-modifying sources will be managed to prevent contamination of runoff and stormwater collected on site. The most common sources of pH-modifying materials are bulk cement, cement kiln dust (CKD), fly ash, new concrete washing and curing waters, waste streams generated from concrete grinding and sawing, exposed aggregate processes, and concrete pumping and mixer washout waters.

Spill Response Materials on Hand

Spill response equipment will be stored onsite in the designated fueling areas and at designated locations throughout the Project area. The minimum materials will be stored onsite:

- A sufficient supply of sorbent and barrier materials will be kept at the construction sites to allow the rapid containment and recovery of a spill. All construction equipment holding over 5 gallons of oil or fuel will be equipped with a shovel, tank patch kit, sorbent materials, plastic bags, and plastic sheeting to contain spills.
- Sorbent and barrier materials will also be used to contain runoff from spill areas.
- Spill kits containing materials and equipment for spill response and clean-up will be maintained at the construction staging area. Each spill kit will contain:
 1. Oil sorbent pads (one bale)
 2. Oil absorbent booms (40 feet)
 3. 55 gallon drums (2)
 4. 9-mil plastic bags (10)
 5. Personal protective equipment including goggles, gloves, and boots.
- Shovels and labeled 55-gallon drums will be kept at the construction staging area.
- Small quantities of soil that has become contaminated will be collected and placed in the drums. Large quantities of contaminated soil will be collected using heavy equipment and stored in properly labeled drums or other suitable containers prior to disposal.

Refueling/Maintenance Areas

The following restrictions apply for all construction activities within designated refueling areas:

- The contractor will refuel equipment and transfer material only in designated areas. The designated areas must be away from all water resources. The minimum distances that must be adhered to are as follows:
 - 500 feet away from any and all surface water sources (including wetlands, ephemeral streams, seasonal streams, lakes, and rivers)
 - 200 feet away from any private water supply well
 - 400 feet away from any municipal water supply well

- The contractor will conduct routine equipment maintenance in the staging area. Repair of all equipment and vehicles involving oil changes, hydraulic system drain down, degreasing operations, fuel tank drain down and removal, and other activities that may result in the accidental release of contaminants, will be conducted off-site. Materials spilled during maintenance operations will be cleaned up immediately and properly disposed of.
- Personnel trained in spill prevention and mitigation procedures will conduct refueling.
- Refueling of any portable equipment will be performed using approved containers with a maximum volume of 5 gallons.
- Equipment will not be washed in streams or within 150 feet of water bodies, including wetlands.

Restricted Activities Areas

In addition to the restrictions noted in the previous section, a buffer zone of 100 feet, referred to as "Restricted Activities Area," will be established where project construction traverses streams, wetland and other bodies of water. Restrictions will include:

- No accumulation of construction debris within the area;
- No pesticides or herbicides will be used without prior consent by the landowner;
- No equipment washing or refueling within the area;
- No storage or any petroleum or chemical material; and
- Pesticides and herbicides will be used in accordance with label restrictions.

Spill Response

- All spills of fuels, oils, petroleum products or hazardous materials will be reported in accordance with NYSDEC regulations. The spill shall be reported immediately to the **NYSDEC Spill Hotline (1-800-457-7362) and Town Code Enforcement Officer (CEO)**.
- All spills will be contained and contaminated soils will be removed in accordance with NYSDEC regulations.

References:

New York State Department of Environmental Conservation (NYSDEC). 1994. *SPOTS Memo #10 Secondary Containment Systems for Aboveground Storage Tanks*. Prepared by NYSDEC Division of Spills Management Bureau of Source Control, September 28, 1994.