BECHTEL PARSONS BLUE GRASS
A Joint Venture of Bechtel National, Inc. and Parsons Government Services Inc.

Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)

Environmental Document

Spill Prevention, Control, and Countermeasures (SPCC) Plan

Contract W52P1J-09-C-0013
(CDRL A021)

24915-00-G01-GGEN-00012

This document has been reviewed for CUI and CUI-sensitive information has been removed.

This document has been reviewed for ITAR and ITAR-sensitive information has been removed.

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prepared by
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prepared for
Program Executive Office –
Assembled Chemical Weapons Alternatives (PEO ACWA)

Approval

Final Approval has completed on 00-G01-GGEN-00012.

Final Approval on 00-G01-GGEN-00012 has successfully completed. All participants have completed their tasks. The document has been approved.

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Management Approval of Spill Prevention, Control, and Countermeasures (SPCC) Plan

Bechtel Parsons Blue Grass (BPBG) and Blue Grass Army Depot (BGAD) management are committed to assigning a high priority to the effective prevention of any spill that could pose a threat to plant employees, the surrounding community, or the environment. To this end, resources have been dedicated as detailed in this plan to minimize the possibility of an accidental spill and to effectively remediate any spill that might occur. Management approval is documented below. This SPCC Plan will be implemented as herein described.

Signature: _____ Digitally signed by McArthur, John DN: CN = McArthur, John C = US O = Bechtel Corporation Date: 2025.04.02 10:03:45 -04'00'

John McArthur, BPBG Environmental Manager

Signature: _____ 4/02/2025

Joe Curcio, BPBG Project Manager

Signature: _____ MELARKODE.RAMESH.SUBRAMANIAN.1274671552 Digitally signed by MELARKODE.RAMESH.SUBRAMANIAN.1274671552 Date: 2025.05.07 10:17:01 -04'00'

Ramesh Melarkode, BGAD Environmental Chief

Record of Revision

Revision No.	Effective Date of Revision	Brief Revision Description
15	10 JUN 2025	Annual Review. Update reference documents. No technical amendments were made during this revision.
14	17 SEP 2024	Revision to update volumes of temporary ASTs at the fueling station after old tanks were replaced
13	26 FEB 2024	Annual review. Updated reference language and updated volumes on diesel generator tanks
12	28 DEC 2022	Revision to include additional SDC 1200 and 2000 hazardous material storage areas
11	21 JUN 2022	Revision for annual review and to add SDC 1200 and SDC 2000
10	18 MAY 2021	Revision to clarify how requirements are currently being met for Main Plant and EDT and to update associated document references throughout. Updated Appendix A1
9	15 APR 2020	Revision to include minor revisions to maps
8	02 MAY 2019	Updated Appendix A Location Map; updated Appendix B to include Sodium Hydroxide; added Appendix E, *BGCAPP Bulk Hazardous Material Reportable Quantity Table*
7	18 DEC 2018	Rewrite
6	17 JAN 2017	Revised to reflect the BGCAPP transition from construction to systemization and operations; added two new forms
5	04 DEC 2014	Revision
4	24 JUN 2013	Revision
3	07 JUL 2010	Revision
2	19 NOV 2008	Revision
1	14 APR 2006	Revision
0	23 MAR 2006	Initial issue

List of Changes

Change No.	Effective Date of Change	Brief Change Description
0	10 JUN 2025	See Record of Revision description.

Table of Contents

Engineer's Certification and Review of SPCC Plan (§112.3(D))

In accordance with 40 Code of Federal Regulations (CFR), Part 112, Bechtel Parsons Blue Grass (BPBG) has prepared an SPCC Plan for the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) Main Plant facility, Static Detonation Chamber (SDC) 1200 facility, and SDC 2000 facility located in Richmond, Kentucky.

The adoptive dates of the SPCC Plan and revisions are given below.

12/06/2022
Date

Revised and Re-certified:

I hereby certify and attest that:

1. I am familiar with the requirements of 40 CFR 112.
2. I have visited and examined the facility.
3. The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR 112.
4. Procedures for required inspections and testing have been established.
5. The Plan is adequate for the facility.
6. This certification in no way relieves BPBG and BGAD Management from its duty to fully implement this plan.

Michael E. Williams, P.E.
BPBG Environmental Engineer

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LICENSED PROFESSIONAL ENGINEER

04/17/24

REV. 13+14 Changes only 04/17/24

12/06/2022

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State and Registration No.

Date

1.0 APPLICABILITY OF OIL POLLUTION RESPONSE REGULATION (§112.1)

NOTE

Applicable regulatory citation quotes appear in italics followed by BGCAPP compliance measures.

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for the BGCAPP facility at BGAD in accordance with Title 40, Code of Federal Regulations, Part 112 (40 CFR 112), Oil Pollution Prevention regulations and Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*.

The U.S. Environmental Protection Agency (EPA) issued the Oil Pollution Prevention regulation to prevent oil spills and to ensure oil facility personnel are prepared to respond if a spill occurs. The regulation has two sets of requirements. The first set of requirements is the SPCC rule. The SPCC rule is the basis of EPA's oil spill prevention program. The second set of requirements is the Facility Response Plan (FRP) rule. The FRP program is designed to ensure certain facilities have adequate oil spill response capabilities.

The SPCC rule applies to any non-transportation-related on-shore facility that has an aggregate aboveground storage capacity of more than 1,320 gallons of petroleum, fuels, and oils (counting only containers of oil with a capacity of 55 gallons or greater). The SPCC rule also applies to facilities that could reasonably be expected to discharge oil in quantities that may be harmful, as described in 40 CFR 110, *Discharge of Oil*, into or upon the navigable waters of the United States (U.S.). In addition, Army Regulation (AR) 200-1 applies to other hazardous substances in storage onsite, requiring adequate secondary containment for liquids and spill contingency planning.

The BGCAPP is a non-transportation-related on-shore facility that stores and uses oil and oil products and has a total aboveground oil storage capacity greater than the 1,320-gallon threshold referenced in §112.1(d)(2)(ii). Furthermore, BGCAPP is hydrologically connected to the local watershed through natural drainage courses that run from BGCAPP to BGAD property and into Muddy Creek.

As such, the following Subparts of 40 CFR 112 apply to the preparation of this SPCC Plan:

- 40 CFR 112.7, *General Requirements for SPCC Plans*
- 40 CFR 112.8, *SPCC Plan Requirements for On-Shore Facilities*

The FRP rule applies to facilities that meet the substantial harm criteria outlined in §112.20(f)(1). These criteria include transferring oil over water, storing more than one (1) million gallons of oil onsite, or having had a spill of 10,000 gallons or more during the past five (5) years. BPBG has determined this facility does not pose a risk of substantial harm as described in §112.20(f)(1) and has prepared a substantial harm determination as described in §112.20(e) and in Appendix C, paragraph 3.0 of part 112. The certification form declaring that BGCAPP is not a "substantial harm" facility is provided in Appendix D.

2.0 GENERAL INFORMATION

2.1 Facility Name

Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)

2.2 Facility Type

Chemical Agent-Destruction Facility, part of the Blue Grass Army Depot (BGAD)

2.3 Facility Location and Contact Information

Blue Grass Army Depot – Facility Owner
Environmental Office, Building S-14
431 Battlefield Memorial Highway
Richmond, KY 40475-5060
Point of Contact (POC): Joe Elliott, Director of Public Works
Telephone: (859) 779-6374

Blue Grass Army Depot – Facility Owner
Environmental Office, Building S-14
431 Battlefield Memorial Highway
Richmond, KY 40475-5060
Point of Contact (POC): Ramesh Melarkode, BGAD Environmental Chief
Telephone: (859) 779-6268

Bechtel Parsons Blue Grass (BPBG) – Facility Operator
830 Eastern Bypass, Suite 106
Richmond, KY 40475
POC: John McArthur, BPBG Environmental Manager
Telephone: (859) 625-6447

3.0 AMENDMENTS TO SPCC PLAN BY REGIONAL ADMINISTRATOR OR OWNER OR OPERATOR (§112.4 & §112.5)

If you are the owner or operator of a facility subject to this part, you must:

(a) Amend the SPCC Plan for your facility in accordance with the general requirements in §112.7, and with any specific section of this part applicable to your facility, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in §112.1(b). Examples of changes that may require amendment of the Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility. An amendment made under this section must be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment (b) Notwithstanding compliance with paragraph (a) of this section, complete a review and evaluation of the SPCC Plan at least once every five years from the date your facility becomes subject to this part; or, if your facility was in operation on or before August 16, 2002, five years from the date your last review was required under this part. As a result of this review and evaluation, you must amend your SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge as described in § 112.1(b) from the facility. You must implement any amendment as soon as possible, but not later than six months following preparation of any amendment. You must document your completion of the review and evaluation and must sign a statement as to whether you will amend the Plan, either at the beginning or end of the Plan or in a log or an appendix to the Plan. The following words will suffice, "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date) and will (will not) amend the Plan as a result."

40 CFR §112.4 is not applicable to the BGCAPP project per §112.4(b) as no discharges more than 1,000 gallons of oil in a single discharge or two discharges of more than 42 gallons within 12 months have occurred at the facility. If these discharges occur, reporting shall be performed as required by §112.4.

The data item description (DID) in the Contract Data Requirements List (CDRL) A021 states that the subcontractor shall develop a Spill Prevention and Countermeasures Plan in accordance with AR 200-1, 40 CFR 112, and 40 CFR 300 and that Government approval is required prior to the start of Construction. The CDRL A021 requires a review and update of the SPCC at least every three (3) years and 60 days before the beginning of each subsequent program phase (i.e., [Systemization – January 31, 2013], Pilot Test, Operations, and Closure). The three (3) year review and update meets the 40 CFR §112 requirement to review and evaluate the SPCC at least every five (5) years.

In accordance with §112.5(a), BPBG periodically reviews and evaluates the SPCC Plan for changes to the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in §112.1(b). Any required amendment to the SPCC Plan resulting from this review must be prepared within six months and implemented as soon as possible but not later than six months following preparation of the amendment.

As a result of scheduled SPCC reviews (three [3] years and 60 days prior to each program phase), amendments to include more effective prevention and control technology, if the technology has been field-proven, will be made to the SPCC within six (6) months of the review and implemented not later than six (6) months following preparation of the amendment. The review and evaluation will be documented with a signed statement either at the beginning or end of the SPCC or in a log or an appendix to the SPCC. Any technical amendments resulting from the review and evaluation will be certified by a registered professional engineer in accordance with §112.3(d). These reviews will not be required if the SPCC is revised sooner than the end of the three-year period.

4.0 GENERAL REQUIREMENTS FOR SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLANS (§112.7)

4.1 Description of Facility's Conformance with Requirements of §112.7(a)

If you are the owner or operator of a facility subject to this part, you must prepare a Plan in accordance with good engineering practices. The Plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. You must prepare the Plan in writing. If you do not follow the sequence specified in this section for the Plan, you must prepare an equivalent Plan acceptable to the Regional Administrator that meets all of the applicable requirements listed in this part, and you must supplement it with a section cross-referencing the location of requirements listed in this part and the equivalent requirements in the other prevention plan. If the Plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, you must discuss these items in separate paragraphs, and must explain separately the details of installation and operational startup. As detailed elsewhere in this section, you must also:

(a)

(1) Include a discussion of your facility's conformance with the requirements listed in this part.

(2) Comply with all applicable requirements listed in this part. Except as provided in § 112.6, your Plan may deviate from the requirements in paragraphs (g), (h)(2) and (3), and (i) of this section and the requirements in subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.9(d)(3), 112.10(c), 112.12(c)(2), and 112.12(c)(11), where applicable to a specific facility, if you provide equivalent environmental protection by some other means of spill prevention, control, or countermeasure. Where your Plan does not conform to the applicable requirements in paragraphs (g), (h)(2) and (3), and (i) of this section, or the requirements of subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c),112.12(c)(2), and 112.12(c)(11), you must state the reasons for nonconformance in your Plan and describe in detail alternate methods and how you will achieve equivalent environmental protection. If the Regional Administrator determines that the measures described in your Plan do not provide equivalent environmental protection, he may require that you amend your Plan, following the procedures in §112.4(d) and (e).

BPBG is committed to preventing discharges of oil to navigable waters and the environment through implementation and regular review and amendment of this plan. All requirements of §112.7(a)(1–2) have been met with the issuance of this SPCC Plan and the facility's conformance with this Plan, which meets all the applicable requirements listed in 40 CFR §112. As a result of scheduled SPCC reviews (three [3] years and 60 days prior to each program phase), amendments to include more effective prevention and control technology, if the technology has been field-proven, will be made to the SPCC within six (6) months of the review and implemented not later than six (6) months following preparation of the amendment. The review and evaluation will be documented with a signed statement either at the beginning or end of the SPCC or in a log or an appendix to the SPCC, unless the plan is revised within the three [3] year period. Any technical amendments as a result of the review and evaluation will be certified by a registered professional engineer in accordance with §112.3(d) to determine that amendments do not deviate from the requirements in paragraphs (g), (h)(2) and (3), and (i) of §112.7 or the requirements in subparts B and C of this part. BPBG has committed the necessary resources to implement the measures described in this plan.

4.1.1 Location and Facility Description (§112.7(a)(3))

Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located. The facility diagram must identify the location of and mark as "exempt" underground tanks that are otherwise exempted from the requirements of this part under § 112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes, including intra-facility gathering lines that are otherwise exempted from the requirements of this part under § 112.1(d)(11). You must also address in your plan:

(i) The type of oil in each fixed container and its storage capacity. For mobile or portable containers, either provide the type of oil and storage capacity for each container or provide an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities;

(ii) Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);

(iii) Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;

(iv) Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);

(v) Methods of disposal of recovered materials in accordance with applicable legal requirements; and

(vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).

This SPCC Plan covers the BGCAPP portion of BGAD (Main Plant, SDC 1200, and SDC 2000). BGAD addresses the requirements of 40 CFR §112 under a separate BGAD SPCC Plan.

The BGCAPP is located within the boundary of BGAD in Madison County, Kentucky. BGAD encompasses an area of approximately 14,596 acres. The BGCAPP is situated approximately three (3) miles southeast of Richmond, 10 miles northeast of Berea, and 25 miles southeast of Lexington. See Appendix A1 for the site location map of BGAD.

The main entrance gates to BGAD are located on the southwestern boundary of the facility off of U.S. Highway 421. U.S. Highway 421 continues north and is joined by U.S. Highway 25 to form the western boundary of the installation. The main entrance to the BGCAPP is on the northern side of BGAD and connects with State Highway 52 across from Charlie Norris Road. Other roads surrounding the facility include State Highway 52 on the north, State Highway 374 on the east, and State Highway 499 on the south. Access to Interstate 75 is three (3) miles west from the BGCAPP entrance. The communities of Moberly, Speedwell, Kingston, Terrill, and Reed's Crossing border BGAD on the northeast, southeast, south, west, and north, respectively.

The BGCAPP will be operated by the BPBG Joint Venture (JV) for the purpose of destroying chemical agent-filled munitions stored at BGAD. Petroleum and other oil products are stored and used at the facility in preparation for and in support of those activities in addition to hazardous substances stored both in tanks and in containers. In the Main Plant facility, chemical agent is drained from munitions, the agent is destroyed by neutralization, and the resulting agent hydrolysate from neutralization is stored prior to final disposition. In the SDC facilities, agent-containing munitions are destroyed in a detonation chamber. Secondary wastes from the activities at the Main Plant and SDC facilities are placed in storage and then shipped offsite for disposition.

The site location map showing storage location of petroleum and other oil products greater than or equal to 55 gallons or larger, topographic map with receiving waters, and probable flow paths of petroleum and oil product spills are provided in Appendix A1, Appendix A2, and Appendix A3, respectively. Appendix A2 also shows the BGCAPP portion of BGAD covered by this SPCC Plan (BGCAPP Main Plant, SDC 1200 facility, and SDC 2000 facility).

A. **Groundwater**. Public water is provided to about 92 percent of Madison County's residents. In areas not served by public water, about 20 percent of the households use wells and 80 percent use other sources. The BGCAPP site is underlain by upper Ordovician limestone, which is generally limited as a groundwater resource. In central and southern Madison County, water wells cannot supply sufficient water for year-round use. In many areas, wells and springs are likely to go dry in late summer and fall. Most domestic water supply wells in Madison County are likely located in the northern part of the county within a narrow corridor along the Kentucky River.

B. **Surface Waters**. Muddy Creek enters BGAD property at the southeast corner and traverses the eastern portion of the BGAD installation toward the southern boundary of the BGCAPP. From there, the creek turns and flows nearly due east until it leaves the BGAD installation at the eastern border. Muddy Creek turns eastward approximately 350 yards south from the BGCAPP property boundary. Muddy Creek ultimately drains to the Kentucky River northeast of BGAD.

   Two small, unnamed ephemeral tributaries of Muddy Creek drain the BGCAPP site. One tributary flows generally north to south and begins approximately 120 yards east of the northeast boundary of the BGCAPP. The other tributary flows northwest to southeast, entering Muddy Creek approximately 350 yards from the southern boundary of BGCAPP. Also, a stormwater detention basin located at the southern edge of the BGCAPP facility empties into this tributary.

   Lake Vega is a 135-acre manmade lake located approximately one (1) mile southwest and upgradient from the BGCAPP site near the center of the BGAD facility. The lake has a capacity of approximately 600-million gallons for storage and drains via tributaries into Muddy Creek. Other surface water bodies are located within the BGAD boundary, but do not receive any drainage from BGCAPP.

4.1.1.1 Type and Quantity of Oil Stored (§112.7(a)(3)(i))

The type of oil in each container and its storage capacity;

The table in Appendix B1 summarizes the type of material, storage methods, and capacities of the bulk petroleum products stored onsite. The location of the petroleum, fuels, and oils storage points are indicated on the map in Appendix A1; used oil storage quantities represent the maximum that will be stored at the location. In addition, petroleum, fuel, and oils and hazardous substances in small quantities (55 gallons or less) may be stored and used at other locations throughout the site as required by operation and maintenance activities.

The AR 200-1 requires the facility to manage systems and equipment used to store oil and hazardous substances in an environmentally safe manner, prevent spills of these substances, and be capable of rapidly responding to spills. The facility must also maintain an accurate inventory of SPCC Plan applicable containers, including the location and/or spatial extent of such containers. Hazardous substances that are used and stored onsite are listed in the Monthly Material Usage Report. The Monthly Material Usage Report is required by AR 200-1 and document 24915-OPS-5PR-00-00023, *Hazardous Waste Management and Hazardous Material Reporting Procedure.* Per 24915-OPS-5PR-00-00023, inventory logs are maintained listing used oil and each hazardous waste in storage that is considered a hazardous substance. The current Resource Conservation and Recovery Act (RCRA) permits for the Main Plant and SDC facilities lists the types and quantities of hazardous waste allowed in the storage area.

4.1.1.2 Discharge Prevention Measures (§112.7(a)(3)(ii))

Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);

Methods of spill prevention at the facility include a combination of measures to minimize the potential for releases. Standing operating procedures (SOPs) for routine handling of products (loading, unloading, and facility transfer) have been developed for all bulk fuel transfer operations and liquid hazardous substances handling activities with potential for spills. These procedures are readily available for review by BGCAPP employees and contractors. These include:

- 24915-OPS-5SO-OTM-00002, *SOP for OTM Condensate Truck Loading Station*
- 24915-OPS-5SO-00-00004, *SOP for Fuel Systems*
- 24915-OPS-5SO-00-00026, (OPSEC) *SOP for SDC 1200 and SDC 2000 Flatbed Operations*

Best management practices are used to control any discharges during the fueling process. These practices can be found in 24915-OPS-5SO-00-00013, *SOP for Mobile Fuel Delivery and Dispensing*.

The BGCAPP facility diesel (528 gallons each) and gasoline (528 gallons) above ground storage tanks (ASTs) are primarily used to fuel vehicles and portable equipment. Each tank has built-in secondary containment. The two large 22,500-gallon capacity diesel fuel ASTs are located within a concrete containment area that has the capacity to hold the volume of an entire tank and a 25-year, 24-hour rainfall event with sufficient freeboard.

Oil containers of 55 gallons or larger are kept on spill pallets that hold the entire volume of the largest container. Bulk storage tanks for hazardous substances are situated in secondary containment structures that ensure spilled materials will not be released into the environment. Secondary containments for these storage tanks have the capacity to hold the volume of the entire tank. Routine handling of non-bulk containers is performed by trained personnel using forklifts and other suitable equipment. To prevent accidents leading to discharges from non-bulk containers, these are handled in accordance with BGCAPP procedures 24915-00-GPP-GHX-00413, *General Safe Work Practices,* and 24915-SAF-5PR-00-00008, *Powered Industrial Trucks and Elevated Work Platforms*.

4.1.1.3 Discharge Drainage Controls (§112.7(a)(3)(iii))

Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;

The primary discharge drainage control method for bulk storage ASTs at BGCAPP is secondary containment at each tank location. The table in Appendix B1 summarizes the type of material, storage methods, and capacities of the bulk petroleum, fuels, and oils and bulk hazardous substances stored onsite. The discharge drainage control for non-bulk petroleum, fuels, and oils and hazardous substances is storage on appropriately-sized spill pallets.

For above-ground single-wall fuel and hazardous material piping located outside of secondary containment areas, an inspection program currently includes weekly inspections of piping and related appurtenances. The second approach includes 24915-GEN-5PR-00-00018, *Emergency Response Procedure – Blue Grass Chemical Agent-Destruction Pilot Plant*, with a commitment of resources necessary to respond to a spill. This document identifies the procedures and response actions required by personnel on the Project to report, respond, and cleanup potential spills quickly and effectively. In addition, this piping is covered under an oil spill contingency plan that follows the provisions of 40 CFR §109 as discussed in Section 4.3.

Accumulated liquid inside bulk secondary containment or in spill pallets is examined prior to discharges or drainage of this liquid to prevent §112.1(b) releases. Guidance for discharging accumulated liquid from bulk secondary containment to ensure it is free of oil and hazardous substances is provided in 24915-00-GPP-GGEN-00016, *Environmental Compliance Handbook*. Waste Management is responsible for characterization and management of containment pallet liquids per 24915-OPS-5PR-00-00023, *Hazardous Waste Management and Hazardous Material Reporting Procedure*.

4.1.1.4 Discovery, Response, and Cleanup (§112.7(a)(3)(iv))

> *Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);*

Spills will be discovered during regular inspections performed in accordance with BGCAPP procedures 24915-OPS-5PR-00-00028, *Environmental Inspections*, *Static Detonation Chamber (SDC) 1200 Environmental Inspection*, 24915-OPS-5PR-80-00003, *SDC 2000 Environmental Inspections*, and 24915-00-GPP-GGEN-00016 or by onsite Project personnel, all trained to the first responder awareness level. Upon discovery of spills (e.g., oil, hazardous substance), the CON is notified.

Response and cleanup activities are covered in detail under 24915-GEN-5PR-00-00018, including roles and responsibilities of BGCAPP Project personnel as well as outside support when required.

The necessary reports and notifications are covered under 24915-00-GPP-GGEN-00012, *Spill Reporting and Notification*.

4.1.1.5 Disposal of Recovered Materials (§112.7(a)(3)(v))

> *Methods of disposal of recovered materials in accordance with applicable legal requirements;*

The BGCAPP will dispose of any recovered materials in accordance with applicable federal, state, and local requirements.

Waste management procedures are described in 24915-OPS-5PR-00-00023, *Hazardous Waste Management and Hazardous Material Reporting Procedure,* and 24915-OPS-5PR-00-00030, *Waste Shipping*.

Hazardous wastes leaving BGAD property may only be transported by a licensed/permitted hazardous waste transporter to properly permitted treatment, storage, and disposal facilities.

4.1.1.6 Emergency Contact Information (§112.7(a)(3)(vi))

Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).

The Environmental Compliance responder will notify the Environmental Manager or designee and will coordinate notification of BGAD authorities along with state and local agencies, depending on the nature and quantity of the spilled material. Refer to document 24915-00-G66-GGEN-00001, *Environmental Notifications List*, for a complete list of the contact names and telephone numbers for subsequent and additional notifications.

4.1.2 Oil Discharge Procedures (§112.7(a)(4–5))

(4) Unless you have submitted a response plan under §112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and, the names of individuals and/or organizations who have also been contacted.

(5) Unless you have submitted a response plan under §112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.

4.1.2.1 Emergency Procedures in the Event of a Spill

In the event of a spill or leak requiring emergency response, BGCAPP will follow 24915-00-G01-GHX-00004, *Emergency Response Plan,* and 24915-GEN-5PR-00-00018 as applicable. The detailed responses to a spill provided in procedure 24915-GEN-5PR-00-00018 satisfy the requirements of §112.7(a)(5).

4.1.2.2 Reporting a Spill of a Reportable Quantity

Reportable quantities are defined in the Kentucky Revised Statute (KRS) 224.01-400, *Reportable Quantities and Release Notification Requirements for Hazardous Substances, Pollutants, or Contaminants*. A KRS reportable quantity of a petroleum product is defined as 75 gallons of diesel or 25 gallons of a petroleum product other than diesel released to the environment within 24 hours. If the spill occurs in the secondary containment and exceeds a reportable quantity, the spill must be reported to the appropriate authorities. Selected other onsite bulk hazardous substance reportable quantity (RQ) amounts can be found in 24915-TEMPLATE-01608, *BGCAPP Bulk Hazardous Material Reportable Quantity Table* (See Appendix E).

Additional reportable quantities of hazardous substances (hazardous materials/waste) are defined in 40 CFR 117.3, *Determination of Reportable Quantities*, and 40 CFR 302.4, *Designation of Hazardous Substances*. Reportable quantities of extremely hazardous substances are listed in 40 CFR 355, *Emergency Planning and Notification*. A copy of the U.S. Environmental Protection Agency's (EPA) "List of Lists," which is a consolidated list of chemicals subject to the Emergency Planning and Community Right-to-Know Act, is provided in 40 CFR 355. This list may be obtained from the EPA, Office of Solid Waste and Emergency Response, or from the EPA website: https://www.epa.gov/system/files/documents/2024-11/consolidated-list-of-lists_updated-october-2024.pdf

The requirements for reporting a spill that is defined as a reportable quantity are provided in procedure 24915-00-GPP-GGEN-00012. The reported information directed by the spill reporting and notification procedure, in conjunction with information provided above in Section 2.0, and procedure 24915-GEN-5PR-00-00018 satisfies §112.7(a)(4).

4.1.3 Spills in Quantities Less Than a Reportable Quantity

In the event of a spill, personnel will notify the Control Room and follow instructions provided in 24915-GEN-5PR-00-00018. Procedure 24915-00-GPP-GGEN-00012 is used for proper notifications of less than reportable quantity spills.

4.1.4 Discharge as a Result of Major Equipment Failure, Rupture, or Overflow (§112.7(b))

> *Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.*

Overfills or major leaks from an AST, piping, or other petroleum, oil, and lubricants (POL) and hazardous substance containing equipment within secondary containment would be completely contained and would neither exit the facility nor reach navigable waters. Contents in containers on spill pallets would also be completely contained.

In the unlikely scenario that a significant spill occurs outside the secondary containment or results in a release through/over the secondary containment structures, such liquids are likely to flow south toward the detention basin. Portions of such a spill are likely to be intercepted by the stormwater collection drains located throughout the facility. Consequently, the basin will provide some protection from release of spills from the BGCAPP footprint. However, if an overflow of the basin occurs under an extreme rainfall event or spill material bypasses the basin, spill residues might be washed into the unnamed tributary of Muddy Creek located south of the basin. The combination of factors that inhibit a release from exiting the facility, though possible, make the event unlikely.

The table in Appendix B2 presents the prediction of the total quantity potentially released, rate, and direction of flow if containment failure results in a release of POL and bulk hazardous substances (outside storage only). Precipitation flow patterns and most likely spill flows are shown in Appendix A3. The maximum volume for hazardous waste releases is listed in the current RCRA permits and in the procedure 24915-OPS-5PR-00-00023 waste inventory logs. These releases would most likely result from tank or container ruptures and will flow based on site grading as indicated in Appendix A3.

Note that the facilities have had no failures (to-date) resulting in reportable quantities of POL or hazardous materials released outside of secondary containment during construction or operations.

4.2 Secondary Containment (§112.7(c))

Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b). The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following prevention systems or its equivalent:

(1) For onshore facilities:

(i) Dikes, berms, or retaining walls sufficiently impervious to contain oil;

(ii) Curbing or drip pans;

(iii) Sumps and collection systems;

(iv) Culverting, gutters, or other drainage systems;

(v) Weirs, booms, or other barriers;

(vi) Spill diversion ponds;

(vii) Retention ponds; or

(viii) Sorbent materials.

A primary discharge control method for bulk oil-filled and hazardous material ASTs, oil-filled transformers, and selected hazardous substances containers at BGCAPP is secondary containment at each location consisting of concrete containment pads and retaining walls. Smaller diesel and gasoline AST tanks have factory-built containment. All stand-by diesel generators (SDGs) have double-wall tanks for the diesel fuel supply. All other drums or containers have individually purchased containment (spill pallets).

Diesel fuel is carried in aboveground single-wall piping outside of secondary containment from the diesel storage tanks to three (3) SDGs. Containment as described in §112.7(c) is impractical because of the run lengths and configuration of the piping located in these areas; in particular, the presence of Hesco barriers around the fuel tanks prevents the extension of secondary containment to be inclusive of the pipe runs. This piping is welded, except for four flanged valves outside of containment. In addition, there is no regular fuel flow except when the generators are run for emergency power or during generator testing, both of which happen infrequently (typically <30 minutes per month). Consequently, the likelihood of leaks from these lines and valves as well the total volume that would result from a leak are minimal. In addition, agent hydrolysate, Off-Gas Treatment System for the Metal Parts Treater and Agent Neutralization Systems (OTM) condensate, and sodium hydroxide (NaOH) is carried in single-wall piping at the Main Plant, and potassium hydroxide (KOH) is carried to the SDC 2000 Off-gas Treatment System (OTS) room in single-wall piping. For the aboveground single-wall fuel and hazardous material piping located outside of secondary containment areas, an inspection program also currently includes weekly inspections of piping and related appurtenances and the contingency plan included in Appendix C of this SPCC plan. Visual inspections are used in lieu of pressure testing of the lines given the construction materials and line contents (diesel).

Single-wall piping outside secondary containment for other hazardous materials is inspected to detect discharges. The second approach to this piping includes document 24915-GEN-5PR-00-00018, with a commitment of resources necessary to respond to a spill. The emergency response procedure identifies the procedures and response actions required by personnel on the facility to report, respond, and cleanup potential spills quickly and effectively. The active inspection program, along with the spill response plan and oil spill contingency plan, together act as an environmental equivalence for piping outside of secondary containment. In the event of a release outside of secondary containment, the site grading and slope direct potential flows toward the site detention basin on the south side of the BGCAPP site. Preventative maintenance on the POL piping and associated ancillary appurtenances (valves, connections) outside secondary containment is performed at sufficient frequency to ensure integrity and prevent leakage.

4.3 Contingency Planning (§112.7(d))

Provided your Plan is certified by a licensed Professional Engineer under § 112.3(d), or, in the case of a qualified facility that meets the criteria in § 112.3(g), the relevant sections of your Plan are certified by a licensed Professional Engineer under § 112.6(d), if you determine that the installation of any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9 (c)(2), 112.10(c), 112.12(c)(2), and 112.12(c)(11) to prevent a discharge as described in §112.1(b) from any onshore or offshore facility is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under §112.20, provide in your Plan the following:

(1) An oil spill contingency plan following the provisions of part 109 of this chapter.

(2) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

All bulk petroleum and hazardous substances storage tanks, equipment, and containers are provided with secondary containment. The secondary containment structures are of sufficient size to contain the volume of the largest single compartment or container along with sufficient freeboard to contain precipitation. Smaller containers are stored on spill pallets. In accordance with AR 200-1, this SPCC Plan is augmented with the contingency plan (see Appendix C) that meets requirements of 40 CFR § 109 and includes provisions for hazardous substances and waste contingencies for the single wall piping outside of secondary containment. In addition, BPBG will provide manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

4.4 Inspections, Tests, and Records (§112.7(e))

> *Inspections, tests, and records. Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.*

Generator inspections are conducted weekly and monthly in accordance with procedure 24915-OPS-5SO-SDG-00001*, SOP for 3.25 MW Standby Diesel Generators and 175 kW ECF Generator* and other applicable generator SOPs. Annual vendor maintenance on all generators is performed. The inspector will sign the completed inspection form(s) and the BGCAPP Project Document Control Center (PDCC) will maintain the records for at least three (3) years along with the SPCC Plan.

4.4.1 Oil and Petroleum Storage Areas

Oil and Petroleum Storage Areas are inspected weekly. Inspection guidance and forms are addressed in 24915-00-GPP-GGEN-00016. Used oil is managed in accordance with procedure 24915-OPS-5PR-00-00023.

4.4.2 Hazardous Substances Storage

The current RCRA permits for the Main Plant and SDC facilities list the types and quantities of hazardous waste allowed in the storage area. Per 24915-OPS-5PR-00-00023, Waste Management also maintains inventory logs of hazardous waste. Inspections for hazardous waste are performed in accordance with the RCRA permits and approved Part F Inspection Schedules.

Bulk chemical storage inspections are performed as part of rounds and readings and recorded on 24915-OPS-5PR-00-00016, *Operations Reading Sheets*.

4.4.3 Tank Truck Operations

Subcontractor personnel who drive tank trucks are responsible for the inspection of tank truck drains/outlets to ensure valve closure after servicing. Specific loading and unloading precautions are discussed in Section 4.7.

4.4.4 Tank Integrity and Corrosion Testing

Integrity and corrosion testing for the two large diesel tanks and the hazardous substance storage tanks is conducted according to the schedule and methods described in 24915-00-G01-GEG-00002, *Tank Corrosion Monitoring Plan*, and 24915-00-GPP-GEG-01047, *Preventive Maintenance of Equipment*. Based on professional engineering judgement, integrity and corrosion testing of the small tanks (<1,000 gal), SDG day tanks, and substations are unnecessary, as visual inspections for rust, cracking, and other signs of corrosion are sufficient.

4.5 Personnel Training (§112.7(f))

> *Personnel, training, and discharge prevention procedures.*
>
> *(1) At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.*
>
> *(2) Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.*
>
> *(3) Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.*

Regarding an oil or petroleum spill, a person is considered “trained personnel” after completing training on the SPCC Plan as a part of the BGCAPP General Employee Training (GET) Parts one (1) through four (4) courses. These courses cover discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan. Regarding a spill involving hazardous material (hazardous waste/substance), a person is considered “trained personnel” after completing the GET courses. The GET courses train attendees to a HAZWOPER first responder awareness level and provide operator level training on the requirements of 29 CFR 1910.120 and 40 CFR 264.16 to employees whose job duties involve storing, transporting, or disposing hazardous waste.

Training related to operation and maintenance of specific equipment to prevent discharges is provided to oil-handling and hazardous substances handling personnel as applicable to their job duties. Hazards associated with potentially hazardous substances are addressed in the job safety analysis (JSA) or on the safety task analysis risk reduction talk (STARRT) card.

Oil discharge prevention briefings are conducted annually for oil-handling personnel to ensure adequate understanding of this Plan. Training includes identifying known discharges, failures, malfunctioning components, and newly developed precautionary measures, if applicable. Training is documented by signed attendance sheets. The Environmental Manager, directly reporting to facility management, is accountable for oil discharge prevention.

4.6 Security (§112.7(g))

Security (excluding oil production facilities).

Describe in your Plan how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.

The BGCAPP facility is located within the boundaries of BGAD. BGAD is a strict access-controlled facility where visitors are required to have an escort, and the employees undergo background checks.

[redacted]

Fuel pumps and outflow/drain valves and pumps may only be accessed by authorized personnel. Authorized personnel are individuals with oil-handling responsibilities that have been instructed in the proper operation and maintenance of oil pollution prevention equipment, spill procedures, general facility operations, and the content of this SPCC Plan. New facility personnel with oil-handling responsibilities are provided with the same training prior to being involved in oil-handling operations.

Loading and unloading of oil or fuels follow strict spill prevention measures and are conducted during daylight or within well-lit areas. Lighting on the site is sufficient to allow detection of discharges during hours of darkness and preventing acts of vandalism.

Other Security Measures (§112.7(g)

[redacted]

4.7 Loading and Unloading (§112.7(h))

Facility tank car and tank truck loading/unloading rack (excluding offshore facilities).

(1) Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.

(2) Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle brake system in the area adjacent to a loading/unloading rack to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.

(3) Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

Bulk chemical and POL loading and unloading racks are available for use on the BGCAPP facility. Procedures for fueling and bulk hazardous substances loading and unloading are provided in 24915-OPS-5SO-00-00013, 24915-OPS-5SO-00-00004, and 24915-OPS-5SO-OTM-00002. Where applicable, signs are in place to warn trucks and other vehicles of overhead pipe racks.

4.7.1 BGAD/BGCAPP Mobile (Refueler) Tank Truck Unloading

Mobile (refueler) tank trucks and mobile trailers are used to fill various equipment onsite, including forklifts, generators, and heavy equipment. The typical mobile tank truck is compartmentalized, and fuel tanks are securely attached to the vehicle or are a part of the vehicle structure. The mobile trailer contains two compartments. For further guidance, refer to SOP 24915-OPS-5SO-00-00013. This SOP provides instructions for fueling vehicles, fueling mobile fuel delivery truck from fuel dispensing station, and delivering fuel to SDGs and mobile equipment. Where applicable, signs are in place to warn trucks and other vehicles of overhead pipe racks.

4.8 Brittle Fracture Evaluation Requirements (§112.7(i))

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

These requirements are not applicable because there has been no repair, alteration, reconstruction, or change in service to any field-constructed tanks. Small volume (550 gallons or less) POL storage tanks currently in use were not field constructed.

4.9 Conformance with State Requirements (§112.7(j))

In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.

This SPCC Plan is prepared in accordance with federal guidance as stated in Section 2.0. The SPCC Plan also meets state, local, and Army requirements. The BGCAPP facility also meets Kentucky state rules and regulations regarding §112.1(b) discharges as well as all other applicable discharge prevention and containment requirements.

4.10 Oil-Filled Equipment (§112.7(k))

40 CFR 112.2 defines Oil Filled Equipment as: Oil-filled operational equipment means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.

§112.7(k) Qualified Oil Filled Equipment

The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section

The two transformers in the 138-kV substation (see Appendix A1) located onsite contain a total of [redacted] The design of the secondary containment for each substation is sufficient to contain the entire volume of coolant oil, and it also provides some additional capacity for rainwater. In the event of a major coolant oil leak, transformer malfunction would occur, leading to an investigation of the substation to prevent oil discharge outside of secondary containment. Consequently, based on professional engineering judgment, the transformer secondary containment is sufficient.

[redacted]

5.0 SPECIFIC REQUIREMENTS (§112.8)

If you are the owner or operator of an onshore facility (excluding a production facility), you must:

(a) Meet the general requirements for the Plan listed under §112.7, and the specific discharge prevention and containment procedures listed in §112.8 as discussed in this section

The BGCAPP facility meets the requirements for the plan listed under §112.7 as discussed in the previous sections.

5.1 Facility Drainage (§112.8(b))

(b) Facility drainage.

(1) Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.

(2) Use valves of manual, open-and-closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an onsite wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater, as provided in paragraphs (c) (3)(ii), (iii), and (iv) of this section.

(3) Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.

(4) If facility drainage is not engineered as in paragraph (b)(3) of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.

(5) Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two "lift" pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in §112.1(b) in case there is an equipment failure or human error at the facility.

5.1.1 Drainage from Secondary Containment

Liquid that is accumulated in secondary containment structures following a storm event must be inspected for evidence of contamination prior to discharge, and the results of the inspection are documented. The inspections are conducted by BGCAPP personnel that are familiar with the requirements of the SPCC and have received GET Part 1 through GET Part 4 training.

Specific guidance for drainage from secondary containment is located in procedure 24915-00-GPP-GGEN-00016.

5.1.2 Drainage from Undiked Areas

In the unlikely scenario that a significant spill occurs outside the secondary containment or results in a release through/over the secondary containment, such liquids are likely to flow south toward the stormwater detention basin. Portions of such a spill are likely to be intercepted by the stormwater collection drains throughout the facility, and liquids would flow toward the detention basin.

5.1.3 Facility Drainage of Stormwater

The BGCAPP facility is located on relatively level terrain and drainage is primarily via surface runoff. A closed stormwater system provides a means of collecting the runoff and transferring it to a detention basin. In the unlikely scenario that a significant spill occurs outside the secondary containment, liquids are likely to flow south toward the detention basin because of site grading and slope. Portions of such a spill would likely be intercepted by the stormwater collection drains throughout the facility and would flow toward the detention basin.

The active inspection program, along with the spill response plan, together act as an environmental equivalence for piping outside of secondary containment. In the event of a release outside of secondary containment, site grading and slope directs potential flows toward the site detention basin on the south side of the BGCAPP site.

5.2 Bulk Storage Containers (§112.8(c))

(c) Bulk storage containers.

(1) Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.

(2) Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.

(3) Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you:

(i) Normally keep the bypass valve sealed closed.

(ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b).

(iii) Open the bypass valve and reseal it following drainage under responsible supervision; and

(iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.

(4) Protect any completely buried metallic storage tank installed on or after January 10, 1974, from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak-test such completely buried metallic storage tanks.

(5) Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.

(6) Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph. (7) Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

(8) Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices:

(i) High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice.

(ii) High liquid level pump cutoff devices set to stop flow at a predetermined container content level.

(iii) Direct audible or code signal communication between the container gauger and the pumping station.

(iv) A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers.

(v) You must regularly test liquid level sensing devices to ensure proper operation.

(9) Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).

(10) Promptly correct visible discharges which [sic] result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.

(11) Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). You must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

5.2.1 Tank Design, Material of Construction, Fail-safe Engineering Features, and Corrosion Protection

There are currently SDGs with manufactured secondary containment for diesel fuel supply, portable skid mount fuel storage tanks with external secondary containment, and [redacted] large capacity fuel ASTs located within secondary containment at BGCAPP. The material and construction are compatible with the stored liquids as well as the operating pressure and temperature conditions. [redacted] The BGCAPP tanks were designed and constructed with sufficient corrosion allowance for the life of the project.

The large capacity tanks and their containment are designed to meet all specifications for spill prevention and control in accordance with applicable federal, state, local, and Army regulations, including high-level and low-level indicators. Level indicators and alarms are monitored during product transfers; level indicators and alarms undergo regular preventive maintenance. The smaller POL storage tanks (≤1,000 gallons) are pre-manufactured or built into the equipment (e.g., SDGs) with internal or external secondary containment features (steel, polyurethane, or other compatible material); the small tanks use visual observation for overfill protection. The ASTs are inspected, and the results documented weekly. The inspections are conducted by BGCAPP personnel that are familiar with the requirements of the SPCC and have received GET Part 1 through GET Part 4 training. Guidance for the SPCC inspection can be found in procedure 24915-00-GPP-GGEN-00016.

5.2.2 Secondary Containment Design, Construction Materials, and Volume

Secondary containment for the SDGs is provided by built-in carbon steel secondary containment that holds the entire contents of the primary tank. The [redacted] capacity fuel ASTs and hazardous substances tanks have a concrete containment area with the capacity to hold the volume of an entire tank and a 25-year, 24-hour rainfall event. Area walls and floors are sufficiently impervious to contain discharged oil or hazardous substances stored in the tanks. External secondary containment is provided by polyurethane tubs for the [redacted] portable skid mount fuel storage tanks, and spill containment for the 55-gallon drums is provided by spill skids or pallets. A metal containment is used for the [redacted] portable fuel tank.

5.2.3 Drainage of Rainwater from Secondary Containment

Guidance for discharging accumulated liquid from bulk secondary containment to ensure it is free of oil or hazardous substances is provided in 24915-00-GPP-GGEN-00016.

5.2.4 Tank Inspection Methods, Procedures, Best Management Practices, and Recordkeeping

Oil and Petroleum Storage Areas are inspected weekly. Inspection guidance and forms are addressed in 24915-00-GPP-GGEN-00016. Used oil is managed in accordance with 24915-OPS-5PR-00-00023.
Hazardous waste inspections are performed in accordance with the RCRA permits and approved Part F Inspection Schedules. Bulk chemical storage inspections are performed as part of rounds and readings and recorded on 24915-OPS-5PR-00-00016. Any visible discharges from tanks are promptly corrected and the accumulated material is removed.

Integrity and corrosion testing for the two large diesel tanks and the hazardous substance storage tanks is also conducted according to the schedule and methods described in documents 24915-00-G01-GEG-00002, *Tank Corrosion Monitoring Plan*, and 24915-00-GPP-GEG-01047, *Preventive Maintenance of Equipment*. Based on professional engineering judgement, integrity and corrosion testing of the small tanks (<1,000 gallon), SDG day tanks, and substations are unnecessary, as visual inspections for rust, cracking, and other signs of corrosion are sufficient.

There are no internal heating coils on any SPCC-regulated tanks at this facility.

The Kentucky Pollutant Discharge Elimination System (KPDES) permit states the Best Management Practices (BMPs) shall be used to control the discharge of pollutants. Additionally, the KPDES describes the effluent limitations for the detention basin to which BGAD/BGCAPP must comply. The BMPs require the retained stormwater to be visually inspected prior to discharge to ensure the discharging waters have no sheen.

Bulk tanks utilize PD6870 Explosion-Proof Loop-Powered Process meters to indicate tank levels. These level meters use either automatic cutoffs or allow signals between the pumping station and the meter. The fuel oil tanks have high- and low-level switches that are function tested annually in accordance with the instrument manufacturer recommendations. The switches have a “wet mode” and “dry mode” that are used for function testing. When the high-level switch is placed in the wet mode, the switch detects moisture, and the alarm is activated.

Other required inspections and testing (e.g., those required to meet American Petroleum Institute [API] or Steel Tank Institute [STI] standards) will be performed as applicable.

All records of inspection and testing are maintained with BGCAPP PDCC.

5.2.5 55-Gallon Drums

Drums containing liquid hazardous substances/oil products are stored on spill-containment pallets. Used oil and hazardous waste is managed in accordance with 24915-OPS-5PR-00-00023. Used oil and hazardous waste containers are stored in secondary containment of sufficient capacity (i.e., minimum of 110 percent of the volume of the largest container or 10 percent of the aggregate of all the containers, whichever is greater, taking into account stormwater intrusion in the secondary containment system).

5.3 Facility Transfer Operations (§112.8(d))

Facility transfer operations, pumping, and facility process.

(1) Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.

(2) Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.

(3) Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.

(4) Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.

(5) Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.

All aboveground valves, pipelines, and appurtenances are inspected regularly along with the tanks, as described and documented in Section 5.2.4. These include an assessment of the general condition of items where visible, including flange joints, expansion joints, valves, pipeline supports, and metal surfaces. Where applicable, signs are in place to warn trucks and other vehicles of overhead pipe racks.

5.4 Mobile Fuel Refuelers (§112.12(c)(11))

Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers and other non-transportation related tank trucks, you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

Mobile refuelers do not require secondary containment; however, portable spill containment will be used as described in 24915-OPS-5SO-00-00013.

6.0 REFERENCES

- 24915-000-2KP-A03-00012, *Records Retention and Turnover*
- 24915-004-V11-EZL0-00086, *138KV Substation Oil Containment Details*, in conjunction with 24915-FCR-00226.
- 24915-00-G01-GEG-00002, *Tank Corrosion Monitoring Plan*
- 24915-00-G01-GGPT-00004, *Attachment G – Contingency Plan and Emergency Procedures* (CDRL A019)
- 24915-00-G01-GHX-00004, *Emergency Response Plan* (CDRL D021)
- 24915-00-G66-GGEN-00001, *Environmental Notifications List*
- 24915-00-GPE-GGPT-00291, *Class 3 Hazardous Waste Permit Modification Request, Treatment of VX Munitions*
- 24915-00-GPE-GGPT-00301, *Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Treatment of VX Rockets*
- 24915-00-GPE-GGPT-00302, *Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Treatment of GB Rockets and Waste Transfer Station (WTS) Container Storage Limit Increase*
- 24915-00-GPE-GGPT-00446, *Main Plant Part B Permit*
- 24915-00-GPP-GEG-01047, *Preventive Maintenance of Equipment*
- 24915-00-GPP-GGEN-00012, *Spill Reporting and Notification*
- 24915-00-GPP-GGEN-00016, *Environmental Compliance Handbook*
- 24915-00-GPP-GGEN-00100, *Environmental Compliance Recordkeeping Procedure* (CDRL D026)
- 24915-00-GPP-GHX-00413, *General Safe Work Practices*
- 24915-13-DBC-00-00008, *UB Mat Foundations Containment Capacities*
- 24915-14-DBC-00-00002, *Fuel Oil Storage Foundation Containment Calculation*
- 24915-70-GPE-GGPT-00012, *Class 3 Hazardous Waste Storage & Treatment Permit Modification Request, Addition of Explosive Destruction Technology (SDC 2000)*
- 24915-70-GPE-GGPT-00013, *Class 3 Hazardous Waste Storage & Treatment Permit Modification Request, Static Detonation Chamber (SDC) 1200 Off-gas Treatment System (OTS)*
- 24915-70-GPE-GGPT-00021, *Part B Permit for SDC 1200*
- 24915-80-GPE-GGPT-00002, *Part B Permit for SDC 2000*
- 24915-GEN-5PR-00-00018, *Emergency Response Procedure – Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)*
- 24915-GEN-5PR-70-00003, *Static Detonation Chamber (SDC) 1200 Environmental* Inspections
- 24915-GOV-V24-HXYT-20873 *Calculation Sheet: MV Transformer Foundation and Containment Appendix E Containment Volume Check*
- 24915-OPS-5PR-00-00016, *Operations Reading Sheets*
- 24915-OPS-5PR-00-00023, *Hazardous Waste Management and Hazardous Material Reporting Procedure* (CDRL D012)
- 24915-OPS-5PR-00-00028, *Environmental Inspections*

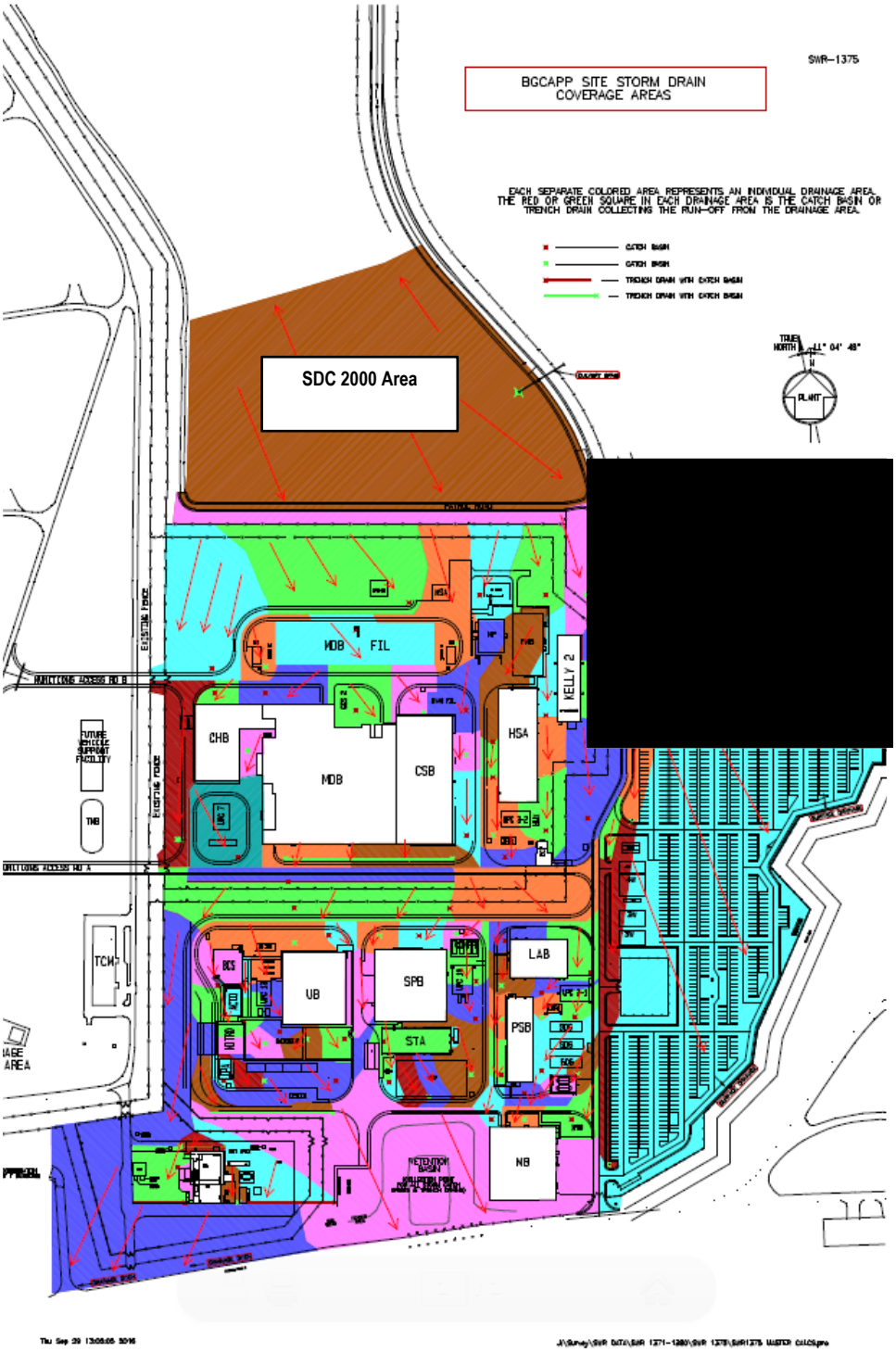
- 24915-OPS-5PR-00-00030, *Waste Shipping* (CDRL D013)
- 24915-OPS-5PR-80-00003, *SDC 2000 Environmental Inspections*
- 24915-OPS-5SO-00-00004, *Standing Operating Procedure for Fuel Systems*
- 24915-OPS-5SO-00-00013, *Standing Operating Procedure for Mobile Fuel Delivery and Dispensing*
- 24915-OPS-5SO-00-00026, (OPSEC) *Standing Operating Procedure for SDC 1200 and SDC 2000 Flatbed Operations*
- 24915-OPS-5SO-70-00010, *Standard Operating Procedure Static Detonation Chamber 1200 (SDC 1200) Off-Gas Treatment System (OTS) Startup, Operation, and Shutdown*
- 24915-OPS-5SO-80-00007, *Standing Operating Procedure for SDC 2000 Utilities Startup, Operation, and Shutdown*
- 24915-OPS-5SO-OTM-00002, *Standing Operating Procedure for OTM Condensate Truck Loading Station*
- 24915-OPS-5SO-SDG-00001, *Standing Operating Procedure for 3.25 MW Standby Diesel Generators and 175 kW ECF Generator*
- 24915-SAF-5PR-00-00008, *Powered Industrial Trucks and Elevated Work Platforms*
- 24915-TEMPLATE-01608, *BGCAPP Bulk Hazardous Material Reportable Quantity Table*
- 29 CFR 1910.120, *Hazardous waste operations and emergency response*
- 40 CFR 109, *Criteria for State, Local and Regional Oil Removal Contingency Plans*
- 40 CFR 117, *Determination of Reportable Quantities for Hazardous Substances*
- 40 CFR 262.260(a), *Purpose and implementation of contingency plan*
- 40 CFR 264, *Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities*
- 40 CFR 264.52, *Content of contingency plan*
- 40 CFR 300, *National Oil and Hazardous Substances Pollution Contingency Plan*
- 40 CFR 264.16, *Personnel training*
- 40 CFR 110, *Discharge of Oil*
- 40 CFR 112, *Oil Pollution Prevention*
- 40 CFR 117.3, *Determination of Reportable Quantities*
- 40 CFR 262.17(a)(7), *Personnel Training*, (as it applies to applicable BGCAPP personnel)
- 40 CFR 262.261, *Content of Contingency Plan*
- 40 CFR 302.4, *Hazardous substances and Reportable Quantities*
- 40 CFR 355, *Emergency Planning and Notification* (Superfund Amendments and Reauthorization Act to identify the substance as extremely hazardous)
- 401 KAR 39:080, Section 1(1), (as it applies to applicable BGCAPP personnel)
- Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*
- 24915-00-G01-GGPT-00008a17 Annex C, Chemical Incident/Mishap Response and Assistance Plan
- Kentucky Pollutant Discharge Elimination System (KPDES) Permit KY0020737
- KRS 224.1-400, *Reportable Quantities and Release Notification Requirements for Hazardous Substances, Pollutants, or Contaminants*

Appendix A – Figures

Appendix A1 – Site Location Map Showing Oil Storage Locations

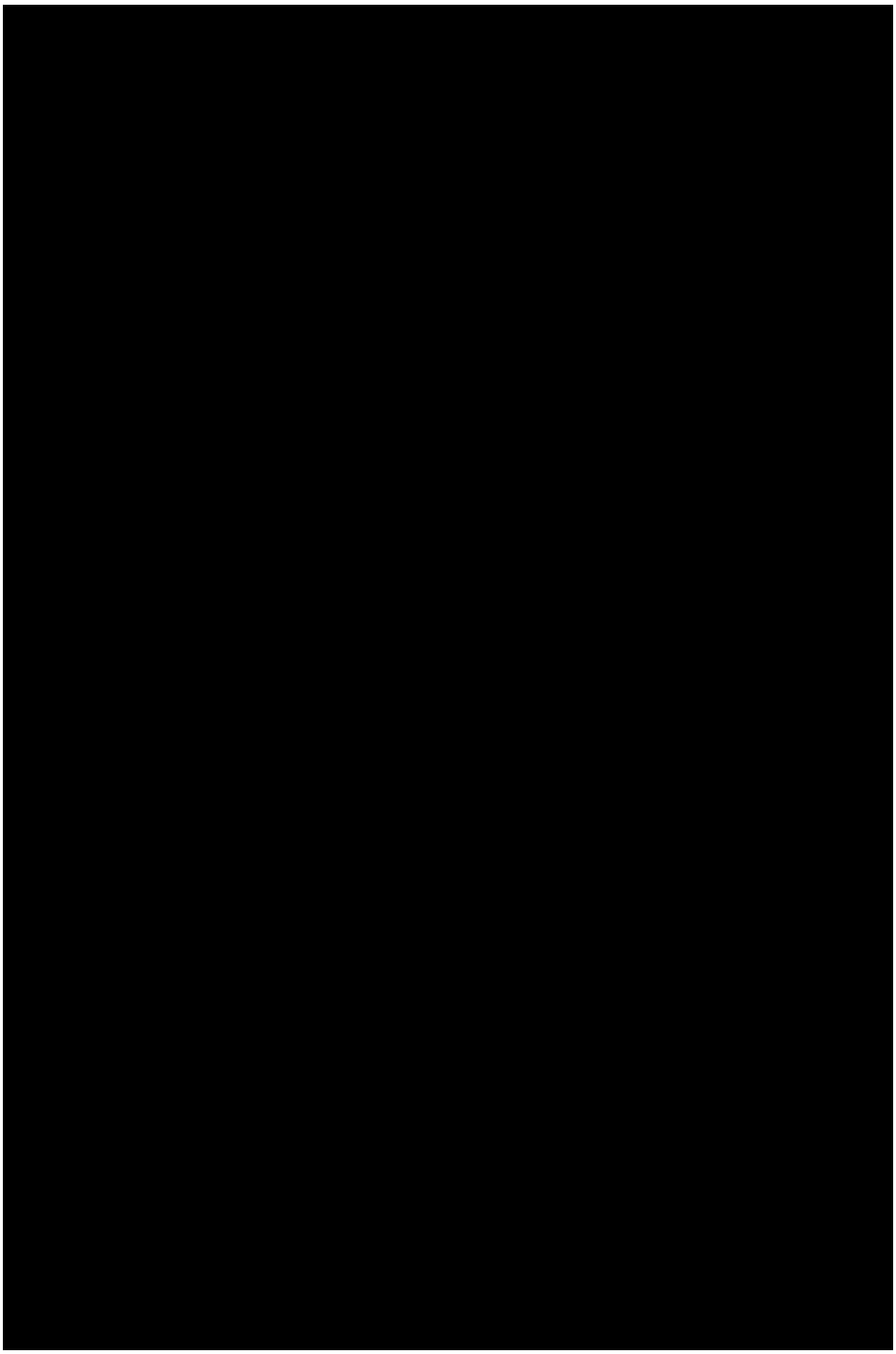
Appendix A2 – Site Topographic Map Including Potential Receiving Waters

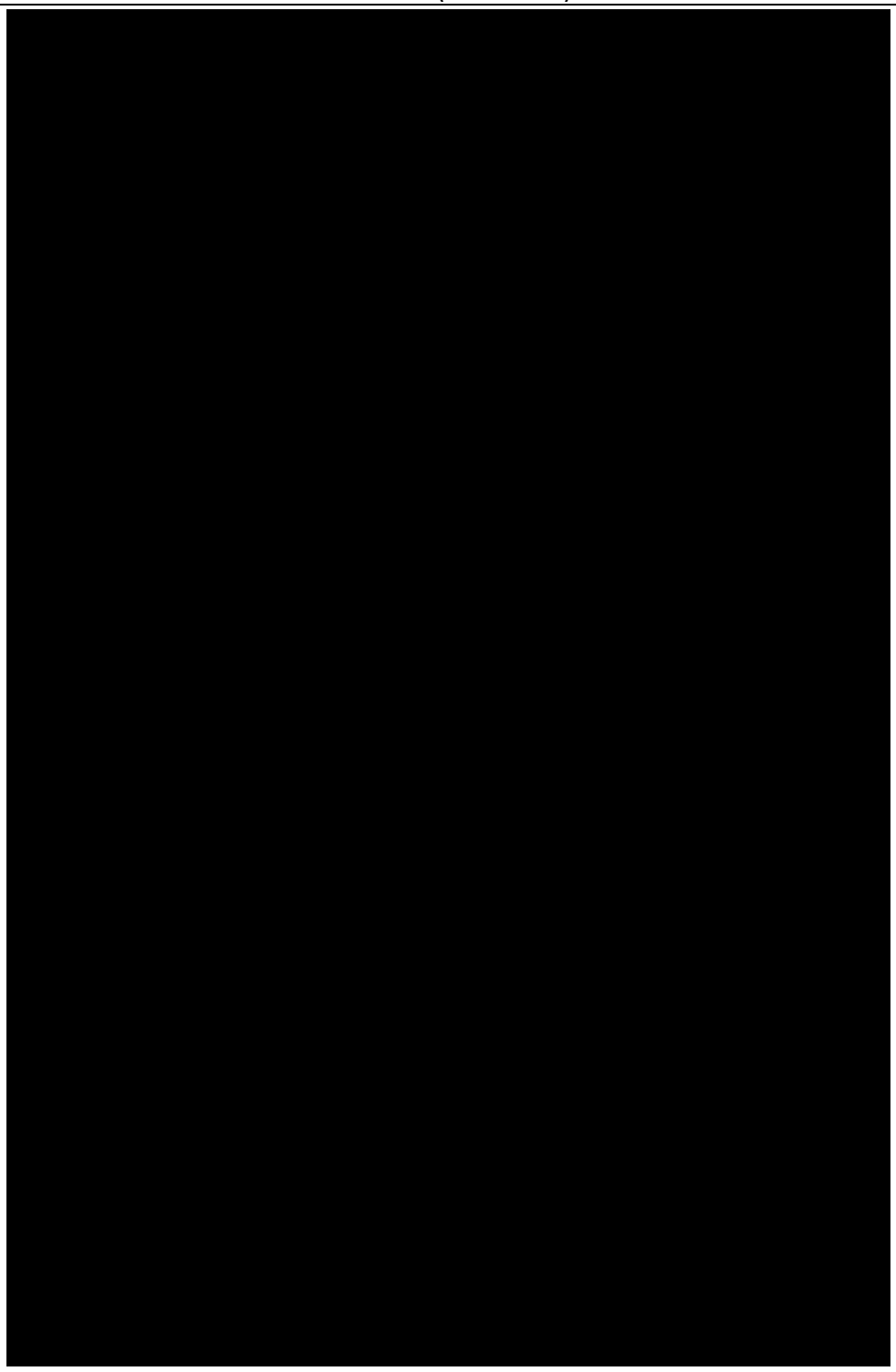
Appendix A3 – BGCAPP Site Storm Drain Coverage Areas and Path of Most Probable Spill Flow



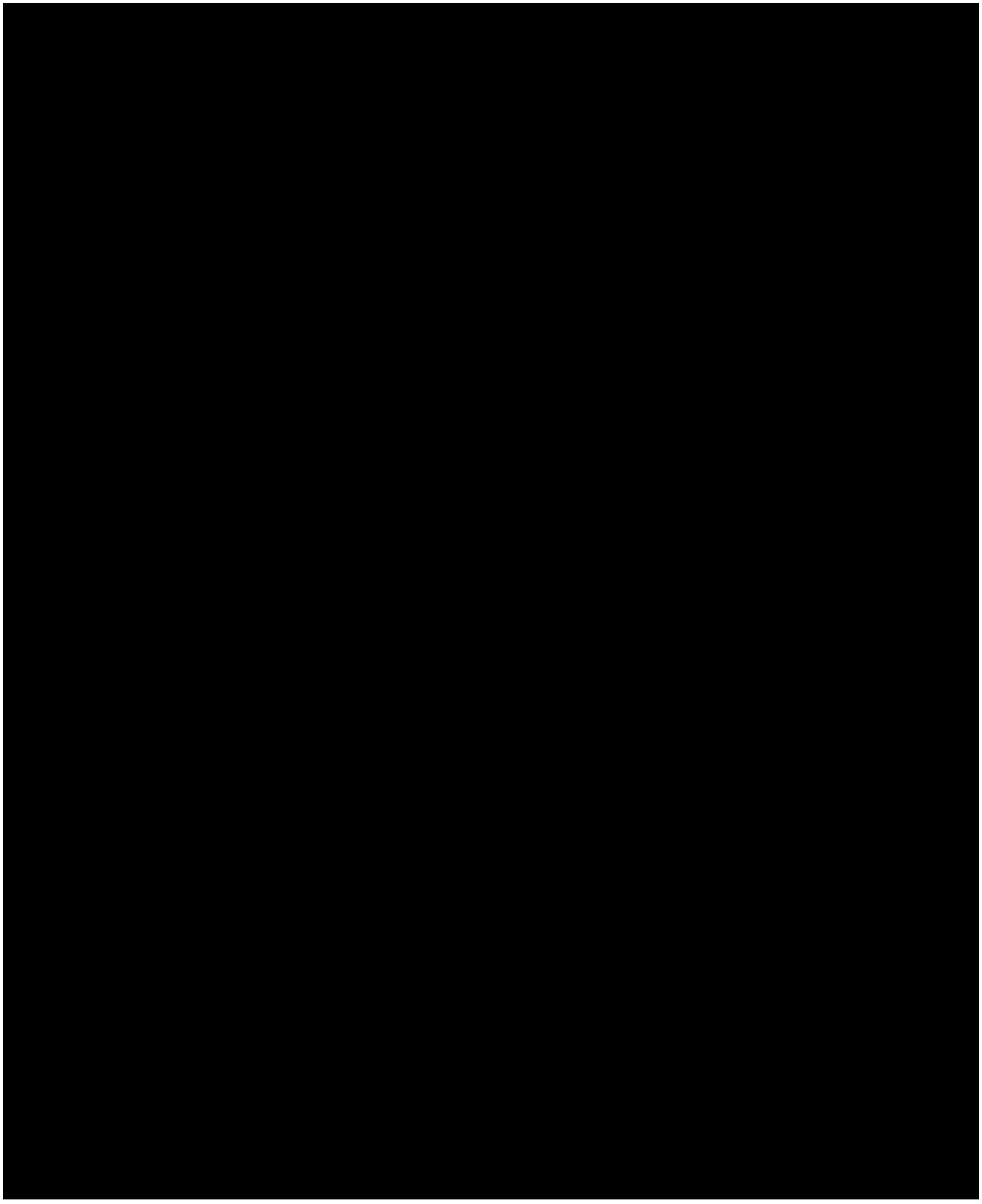
Appendix B – Tables

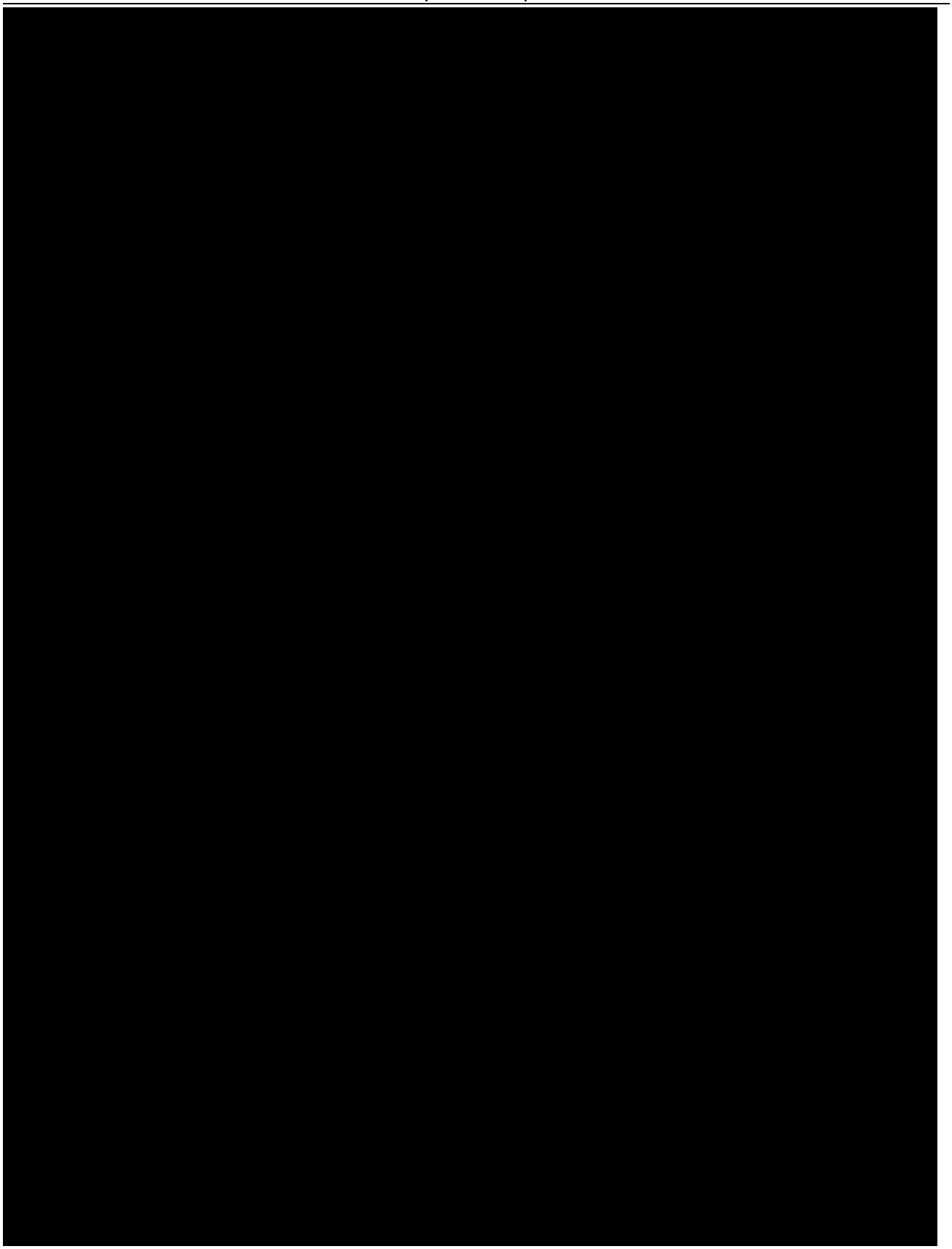
Appendix B1 – Material, Storage Method, and Capacity of Petroleum, Oil, and Lubricants (POLs) and Hazardous Substances (≥55 gallons) Stored Onsite

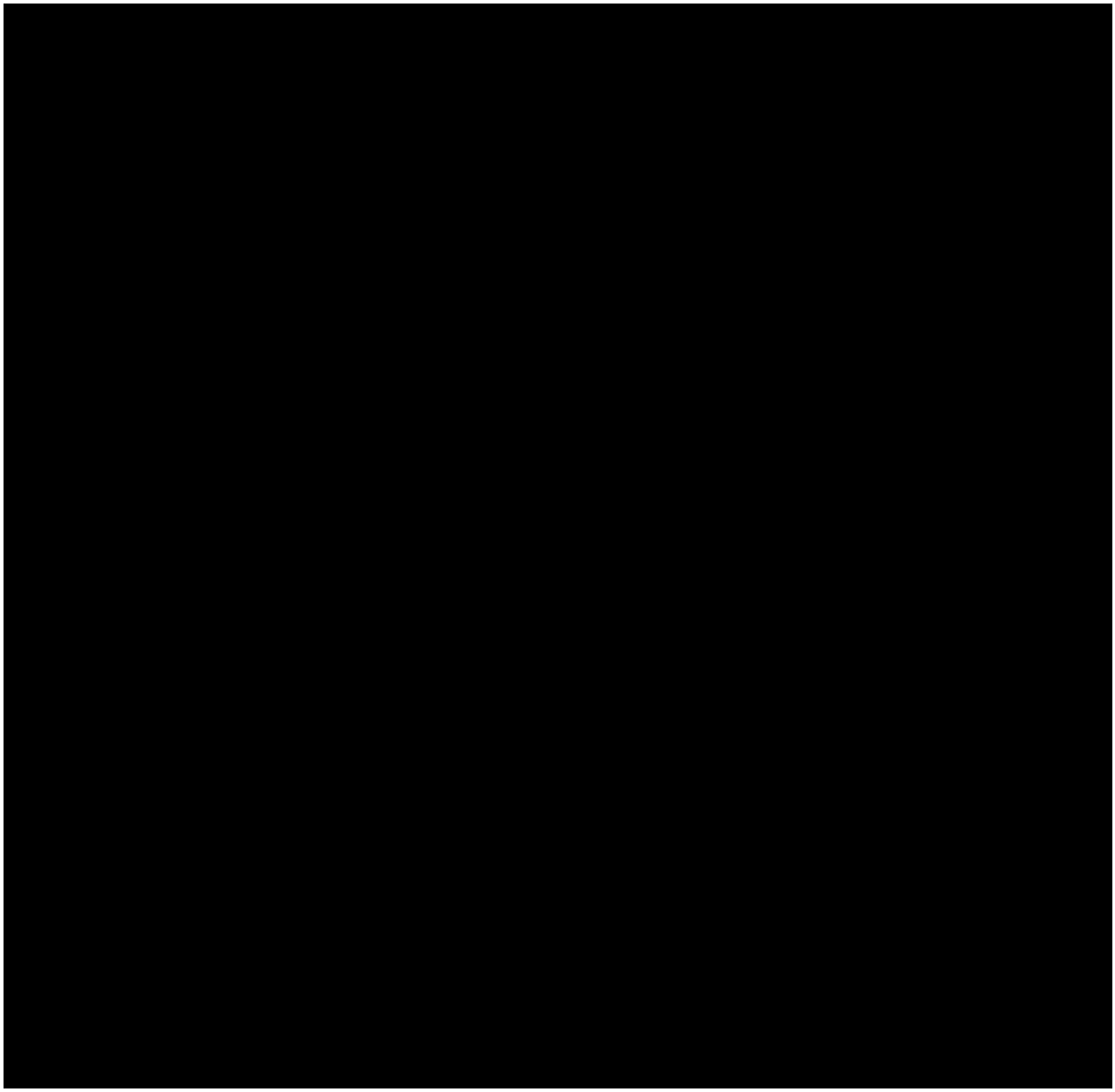




Appendix B2 – Analysis of Discharge as a Result of Major Equipment Failure, Rupture, or Overflow







Appendix C – Contingency Plan to Augment the SPCC Plan

40 CFR §112.7(d) Provided your Plan is certified by a licensed Professional Engineer under § 112.3(d), or, in the case of a qualified facility that meets the criteria in § 112.3(g), the relevant sections of your Plan are certified by a licensed Professional Engineer under § 112.6(d), if you determine that the installation of any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and §§ 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), and 112.12(c)(11) to prevent a discharge as described in § 112.1(b) from any onshore or offshore facility is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under § 112.20, provide in your Plan the following:

(1) An oil spill contingency plan following the provisions of part 109 of this chapter.

1.0 GENERAL

This Contingency Plan, which augments the BGCAPP SPCC Plan and also serves as the Oil Spill Contingency Plan, is prepared in accordance with 40 CFR §112.7(d) to address facility areas where secondary containment is impracticable and contains site-specific information for actions taken subsequent to a spill. This Oil Spill Contingency Plan complements the prevention and control measures presented in the facility's SPCC Plan by addressing areas of the facility that have inadequate secondary containment, particularly diesel and hazardous material lines outside secondary containment, and impacts that may result from a discharge from these areas. The SPCC provides a description of the facility, maps, and oil storage areas. All spills, leaks, and unplanned releases to soil or ground and/or surface waters, along with fires, or explosions are reported to the BGAD Fire Department and BGAD Environmental Department. The BGAD Commander or alternate makes the determination as to whether to activate the BGAD SPCC/Information System Contingency Plan (ISCP), which will be implemented for fires, explosions, or unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents or oil to air, soil, or surface or groundwater.

The BGCAPP facility is located on a U.S. Army installation; therefore, BGCAPP also complies with the requirements set forth in AR 200-1. The Oil and Hazardous Substances Spills section of AR 200-1 requires each installation or activity with the capability for a release of a reportable quantity of oil or hazardous substances to prepare, maintain, and implement a Contingency Plan. This Contingency Plan in conjunction with requirements and methods provided in *Contingency Plan and Emergency Procedures,* Attachment G to 24915-00-GPE-GGPT-00439, Part B Permit for Main Plant and Attachment G, *Contingency Plan and Emergency Procedures* in 24915-70-GPE-GGPT-00021, Part B Permit for SDC 1200, and 24915-80-GPE-GGPT-00002, Part B Permit for SDC 2000 meet the 40 CFR §112.7(d) and AR 200-1 requirements.

2.0 PURPOSE

This Contingency Plan is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous substances/oil at the BGCAPP facility. Provisions of this plan will be implemented immediately whenever there is a fire, explosion, or release of hazardous substance or oil that could threaten human health or the environment.

3.0 CLASSIFICATION OF HAZARDOUS SUBSTANCES AND RESOURCES AT RISK (40 CFR 109.5(b)(1), 40 CFR 109.5(c)(2), and 40 CFR 109.5(d)(5))

Hazardous substances and other materials may be stored at BGCAPP. Hazardous substances are defined as:

- Chemicals
- Pesticide, insecticide, and rodenticide
- Herbicide and fungicide
- Heavy metals
- All POL products including, but not limited to, oil, gasoline, fuel oil, brake fluid, transmission fluid, hydraulic fluid, mineral oil (electrical transformers), lubricating oil, and sludge
- Antifreeze
- All other elements or compounds that pose an imminent or potential threat to public health and environmental quality, except nuclear (radiological), biological, and chemical (NBC) materials

As discussed in the SPCC, the BGCAPP site drains into ephemeral tributaries to Muddy Creek, which subsequently drains into the Kentucky River. The primary risk to release oil into these waters is from diesel and hazardous material lines outside of secondary containment, as other tanks and containers all have sufficient secondary containment to prevent releases. However, risk of release from these diesel lines is minimal as site drainage is toward a central detention basin that would prevent discharge except in highly unusual conditions such as flooding at the same time as the diesel release.

For planning purposes, the total amount of diesel that could spill would be the amount that could flow through the lines from the sources, which are the [redacted] tanks.

4.0 POINT(S) OF CONTACT (POCs) and RESPONSIBILITIES (40 CFR 109.5(a), 40 CFR 109.5(d)(2), and 40 CFR 109.5(b)(2), 40 CFR 109.5(d)(2), 40 CFR 109.5(b)(3), 40 CFR 109.5(d)(3))

Points of contact (POCs) and emergency response responsibilities are listed in 24915-GEN-5PR-00-00018, *Emergency Response Procedure – Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP).*

5.0 CONTINGENCY PLAN IMPLEMENTATION (40 CFR 109.5(d), 40 CFR 109.5(e))

The decision to implement the Contingency Plan depends upon whether an imminent or actual incident could threaten human health or the environment. If a spill does not immediately threaten the environment and personnel are definitively not at risk, a spill may be contained and abated by BGCAPP personnel without implementing the Contingency Plan. The BGCAPP implements the Contingency Plan, or the contingency requirements in 24915-00-GPE-00439, Part B Permit for Main Plant and Attachment G, *Contingency Plan and Emergency Procedures* in 24915-70-GPE-GGPT-00021, Part B Permit for SDC 1200, and 24915-80-GPE-GGPT-00002, Part B Permit for SDC 2000, when a fire, explosion, or release of a hazardous substance could threaten human health or the environment.

The implementation of the Contingency Plan occurs in the following specific situations:

- A fire or explosion occurs at or on the route to the BGCAPP.
- A fire threatens the BGCAPP or the route to the facility.
- A fire or potential explosion involving the BGCAPP or the route to the facility threatens offsite areas.
- Use of water or chemical fire suppressant on a fire could result in contaminated run-off.
- An imminent danger exists that an explosion could occur, causing a safety hazard because of flying fragments or shock waves.
- An imminent danger exists that an explosion could result in a release of hazardous constituents from the BGCAPP.
- A spill of a hazardous substance or oil results in a fire, explosion, or potential fire or explosion.
- A spill of a hazardous substance or oil is contained onsite but may potentially contaminate soils, groundwater, or surface water resources.

If a spill or leak is discovered, personnel immediately report it to CON. If known, the following information will be reported when contacting the CON:

- The type of material spilled or released
- Location of the release or spill
- An estimate of quantity released and the rate at which it is being released
- The direction in which the spill is heading
- Any injuries involved

- Fire and/or explosion or possibility of these events
- The intensity of the fire or explosion

5.1 Response

This plan incorporates by reference 24915-00-G01-GHX-00004, *Emergency Response Plan*, and uses the incident command system (ICS) detailed in the plan.

Response to an unplanned release of hazardous substance or oil or its constituents follows 24915-GEN-5PR-00-00018, *Emergency Preparedness Procedure-Emergency Response Procedure – Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)*.

5.2 Notifications (40 CFR 109.5(b)(2))

As indicated in 24915-00-G01-GHX-00004, *Emergency Response Plan*, notification occurs immediately upon identification of an unplanned release of hazardous substance or oil that could threaten human health or the environment.

Additional information is contained in 24915-GEN-5PR-00-00018. If a potential chemical agent release were to occur outside of engineering controls or a chemical agent injury were to occur anywhere at BGCAPP, the Chemical Incident/Mishap Response and Assistance (CIMRA) Plan would be activated in addition to the BGCAPP Emergency Response Plan (ERP) as described in Attachment G to 24915-00-GPE-GGPT-00439, Part B Permit for Main Plant and Attachment G, *Contingency Plan and Emergency Procedures* in 24915-70-GPE-GGPT-00021, Part B Permit for SDC 1200, and 24915-80-GPE-GGPT-00002, Part B Permit for SDC 2000

6.0 IDENTIFICATION OF HAZARDOUS SUBSTANCES

The character, source, amount, and extent of the release will be identified by the Area Operations Supervisor in cooperation with Environmental Department personnel. Tracking of hazardous material (HAZMAT) on the site is detailed in 24915-OPS-5PR-00-00023, *Hazardous Waste Management and Hazardous Material Reporting Procedure*. The Safety and Health (S&H) Department maintains the safety data sheets (SDSs) for all hazardous substances on the site.

Waste Management maintains inventory records of waste in site storage areas.

7.0 ASSESSMENT OF RISK

Emergencies involving fires, releases, or explosions require determination of the character of the fire or release, source, amount, and extent of released materials. This can be accomplished by observation, review of facility records or manifests, chemical analysis, or plume plotting. Concurrently, hazards to human health or the environment, both direct and indirect, must be assessed (e.g., effects of any toxic, irritating, or asphyxiating gases, or any hazardous surface runoff from water or chemical agents used to control a fire). Emergencies involving fires, explosions, or releases automatically activate the Management Advisory Team (MAT) described in 24915-00-G01-GHX-00004, *Emergency Response Plan*.

In accordance with 24915-00-G01-GHX-00004, the Incident Commander assesses possible direct and indirect hazards to human health and the environment. This assessment should consider the following:

- A primary hazard considered for each emergency is the possibility of explosion because of the presence of propellants and explosives within the BGCAPP facility. These materials can either increase the intensity of a fire because of the additional fuel added by these materials or those materials initiate explosions during an emergency. Design of blast walls and vents in the waste processing areas reduce the severity and probability of impacts to human health or the environment outside of the BGCAPP.
- The possible hazards associated with fires (i.e., unless chemical agents are involved) include the initiation of explosions, burns, smoke inhalation, and ignition of vegetation and adjacent buildings.
- Spills of hazardous substances introduce the possibility of impacts to human health and the environment as releases may flow into nearby waterways (e.g., the unnamed tributary of Muddy Creek or the BGCAPP stormwater impoundment) and subsequently affect the environment and human health. The likelihood of these impacts is very low because of BGCAPP design features in the processing and waste storage areas. Examples of these design features include lined concrete containments with sufficient volume to contain not only any reasonable release but also storm events (outdoor tank storage), fire system discharges (indoor processing and storage areas), and automatic and manual shut-offs (in the waste processing areas). In addition, spills can provide fuel for subsequent fires if the introduction of an ignition source occurs near a flammable spilled material.

8.0 CONTROL PROCEDURES

In the event of a release, initial response objectives are to protect human health and safety, limit movement of the released material, and control the source. In all cases, the site of the hazard is secured to limit access to only qualified personnel involved in response procedures.

Fire is a potential hazard in spills of petroleum products or other flammable materials; therefore, all possible sources of ignition in the immediate area will be eliminated. This will include, but not be limited to, non-emergency vehicular traffic. Such restrictions will be imposed until the spill is contained and safety is restored.

The general procedures to follow during an emergency are referenced in document 24915-GEN-5PR-00-00018, *Emergency Response Procedure – Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP).*

9.0 PREVENTION OF RECURRENCE OR SPREAD

All operations near the release will be suspended until resumption is authorized by the Operations Area Supervisor. After the incident, BGCAPP and the appropriate BGAD personnel will conduct a review of the release to determine the cause and address corrective measures. The operation causing the release will not resume until adequate corrective measures are implemented.

10.0 SPILL RESPONSE EQUIPMENT (40 CFR 109.5(c)(1) and (c)(2))

The HAZMAT response materials are stored and maintained in areas where oils and hazardous substances are used and/or stored, including:

Spill kits are located in areas where the following may be required:

- Empty 55-gallon drums to hold contaminated material
- Absorbent socks
- Floating booms, “oil-dry” loose absorbent material, absorbent pads, nitrile gloves, neoprene gloves, boots, or disposable booties

The contents of these spill kits are oriented to the type and hazard of material used in the area. Spill kits typically contain the following items but may be augmented with additional items as necessary:

- Absorbent materials (pads, pigs, blankets, dry sweep)
- Disposable gloves
- Plastic bags

The S&H Department is responsible for the maintenance and use of portable monitoring equipment (e.g., combustible gas indicator) that may be required to respond to a spill. Waste Management provides containers for spill response debris and assists with the proper disposal of wastes following cleanup. It is the responsibility of the individual or individuals using the spill kit materials to replace materials used from the spill kits in the event the kits are needed for future spills.

11.0 EMERGENCY OR SPILL RESPONSE

11.1 Coordination Agreements

The BGCAPP, as a tenant organization on BGAD, receives fire/emergency medical service, HAZMAT response, security/law enforcement, and incident cleanup assistance from the installation. The BGCAPP coordinates hospital and additional medical/ambulance services through BGAD to align and comply with BGAD's standing agreements. Refer to document 24915-00-G66-GGEN-00001, *Environmental Notification List,* for the current notification contact information. The BGCAPP conducts minor incident cleanup with Project assets, but contracts larger incidents to pre-qualified contractors with applicable specialty skills for the nature of the incident.

11.2 Emergency Equipment (40 CFR 109.5(d)(3))

The BGCAPP provides spill-response kits for mobile refuelers, fuel loading/unloading areas, and hazardous substances use/storage areas. Spill-response kits are filled with materials appropriate to the nature of the spill for that area.

Additional emergency equipment for the facility includes:

- Fire extinguishers located throughout the site and inside the plant buildings in accordance with fire code compliance
- Means of communication via equipment to including radios, telephones, and verbal/public address messages to advise employees outside buildings of an incident or potential fire, explosion, or release. These communication means are augmented by alarm systems for fire or unintended release of a hazardous substance
- A siren warning system that is operated by BGAD in coordination with the Chemical Stockpile Emergency Preparedness Program (CSEPP) and Madison County Emergency Management Agency (EMA) to notify the installation and surrounding area of a chemical agent-related incident
- Eye wash/emergency showers located near potential hazard exposures to allow for rapid response
- Additional spill control/emergency equipment provided through BGAD Fire Department and HAZMAT team. BGAD and BGAD Fire Department emergency equipment are listed in a Spill Response appendix in the BGAD SPCC

11.3 Evacuation Plan

24915-00-G01-GGPT-00008a17, *Annex C, Chemical Incident/Mishap Response and Assistance Plan*, is the planning document for full and partial evacuation of personnel from both BGCAPP and BGAD. The ERP provides for notification, assembly, accountability of employees and visitors, evacuation routes, and signals. Facility personnel are informed daily of evacuation route changes, which are dependent on weather and systemization and operation activities.

11.4 Routes and Assembly/Accountability Points

The ERP, in conjunction with 24915-00-G01-GGPT-00008a17, identifies primary and alternate evacuation routes from the BGCAPP site to selected accountability points (also known as assembly points throughout this document) directed by BGAD. The specific routes and accountability points are identified and posted at specified locations at the beginning of the workday and modified throughout the day based on activities and weather conditions.

12.0 CLEANUP PROCEDURES

The BGCAPP conducts minor incident cleanup with Project assets but may contract larger incidents to approved/qualified contractors with applicable specialty skills for the nature of the incident.

Immediately after an emergency, BGCAPP personnel provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility in accordance with applicable federal, state, local, and Army regulations.

BGCAPP personnel in the affected area(s) of the facility ensure:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed
- All emergency equipment listed in the contingency plan is cleaned, repaired, replaced, and fit for its intended purpose before operations is resumed

13.0 COPIES OF THE CONTINGENCY PLAN

The BGCAPP Environmental and S&H Managers are responsible for providing this Contingency Plan and copies of Attachment G to 24915-00-GPE-GGPT-00439, Part B Permit for Main Plant and Attachment G, *Contingency Plan and Emergency Procedures* in 24915-70-GPE-GGPT-00021, Part B Permit for SDC 1200, and 24915-80-GPE-GGPT-00002, Part B Permit for SDC 2000, and ERP respectively to the BGAD Commander and/or BGAD Environmental Offices.

14.0 AMENDMENT OF CONTINGENCY PLAN

This Contingency Plan is reviewed and updated within six (6) months of a change in the facility. The BGCAPP Environmental Manager is responsible for reviewing and changing the Contingency Plan. If any changes that may affect the implementation of the plan occur within a calendar half year, they will be distributed (semi-annually) in the form of inserts to the Contingency Plan to the

BGAD Commander for further distribution as noted in the previous section.

15.0 REPORTING

If there is a spill or release to the environment, the BGCAPP Environmental Department responder will notify BGAD and the appropriate agencies will be contacted, depending on the quantity and type of constituent spilled or released in accordance with document 24915-00-GPP-GGEN-00012, *Spill Reporting and Notification*. The Environmental Department responder will complete the appropriate spill report forms and distribute them in accordance with document 24915 00-GPP-GGEN-00012.

Appendix D – 40 CFR §112 Appendix C Certification of Substantial Harm Determination Form

Facility Name: Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)

Facility Address: 3000 Irvine Road, Richmond, KY 40475-8295

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? ?

   Yes_____ No___X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

   Yes_____ No___X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C–III to this appendix or a comparable formula[1]) 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 Plans: Fish and Wildlife and Sensitive Environments" (see appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.

   Yes_____ No___X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake?

   Yes_____ No___X

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

   Yes_____ No___X

FACILITY REPRESENTATIVE 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.

Joe Curcio

(Signature) Joe Curcio, BPBG Project Manager

4/02/2025

Date

Appendix E – BGCAPP Bulk Hazardous Material Reportable Quantity Table

BGCAPP Bulk Hazardous Material Reportable Quantity Table	
Material	**Reportable Quantity**
Diesel Fuel	>75 Gallons
Petroleum Product Other Than Diesel Fuel	>25 Gallons
Caustic NaOH 20%	>491 Gallons
Caustic NaOH 50%	>156 Gallons
Potassium Hydroxide 30%	>196 Gallons
Monochlorobenzene	>11 Gallons