



CITY OF WASHINGTON

**SPILL PREVENTION, CONTROL AND
COUNTERMEASURE PLAN**

Adopted
October 5, 2009

Table of Contents

Chapter	Description	Page
1	Facility Descriptions.....	3
1.1	Municipal Power Plant, 1001 Park Road, Washington, Kansas.....	3
1.2	City Shop, 1001 Park Road, Washington, Kansas.....	4
1-3	Road Oil and Transformer Area, 425 Airport Road, Washington, Kansas.....	4
2	Oil Storage Tank Inventory.....	6
2-1	Tank #1 and Tank #2.....	6
2-2	Tank #3 and Tank #4.....	6
2-3	Waste Oil Tank.....	7
2-4	Truck Road Diesel.....	7
2-5	Truck Gas Tank.....	8
2-6	Engine Day Tanks.....	9
3	Stored Containers (55 gallons or larger).....	13
3-1	Building #1.....	13
3-2	Building #2.....	13
3-3	Building #3.....	13
4	Oil Containing Stationary Equipment.....	14
4-1	Building #1.....	14
4-2	Building #2.....	14
4-3	Building #3.....	14
4-4	Equipment within fenced area adjacent to #1 building on the south side. An area 71 feet by 31 feet.....	15
4-5	West of Building #2 is where the #3 building transformer is located.....	15
5	Discharge Prevention.....	16
6	Secondary Containment.....	18
7	Description of Countermeasures.....	20
8	Planned Disposal Methods.....	21
9	Contacts.....	22
10	Persons Accountable at Each Facility.....	23
10-1	Power plant and tank containment area.....	23
10-2	Maintenance shop and road oil tank area on Airport Road.....	23
10-3	Transformer storage area on Airport Road.....	Error! Bookmark not defined.
10-4	City Administrator.....	23
11	Tests and Inspections.....	24
12	Personnel Training.....	25
13	Security Measures.....	26
14	Spill History.....	27

Chapter 1

Facility Descriptions

1.1 Municipal Power Plant, 1001 Park Road, Washington, Kansas.

The Washington Municipal Power Plant is an electrical generation facility for the City of Washington, Kansas. The plant houses seven engines used to produce electricity. Five engines are dual fuel and two are diesel only. At maximum capacity the plant is capable of generating over 9,000 kilowatts.

The plant is staffed from 8 a.m. to 5 p.m. Monday through Friday and subject to call from the contracting utility company. The plant is visually checked by on-call personnel on weekends and holidays. Pit levels are monitored with sensors and an emergency call list activated should an alarm condition occur. Pits are drained by means of a sump pump which is only energized after personnel inspect the pit and determine the high level is not the result of an oil or fuel spill.

Electrical generation usually takes place during the peak summer months. The plant is also able to provide power to the city of Washington during interruption of service from the contracting utility due to weather related outages, mechanical failures or other emergencies.

The plant consists of three buildings. #1 building houses four engines, #2 building houses two engines and #3 building houses one engine.

A substation is located immediately south and east of the #1 building. The substation contains transformers, switch gear and line reclosers. To the west of the #3 building is the fuel storage area containing two 15,000 gallon upright diesel storage tanks, two 12,000 gallon laydown diesel storage tanks, one 300 gallon waste oil tank, one 500 gallon diesel fuel tank and one 1,000 gallon unleaded gasoline tank. The 500 gallon diesel and 1,000 gallon gasoline tanks are used by the city for their vehicles. The larger fuel oil tanks are used by the power plant for electrical generation. All tanks are located within a concrete containment area.

When fuel oil, truck diesel and gasoline are unloaded the delivery truck parks inside a curbed containment area and hoses are attached to the appropriate tank. Fuel is then pumped from the delivery truck to the tanks. During the transfer of fuel, city personnel are present to visually monitor the transfer and take corrective action should any spill or overfill occur. Fuel is pumped from the tanks as needed to the street department vehicles from the gasoline and diesel fuel tanks. City personnel will inspect vehicles leaving the curbed containment area to ensure that materials do not drip, flow or blow onto public streets after fueling or unloading.

Fuel oil to the power plant is piped by gravity feed into individual day tanks for each engine. The day tank for the #4 engine is located in the basement of the #3 building. The day tank for #7 engine is located under the floor in front of the #7 engine in the #2 building. All other day tanks are in concrete bunkers and are located directly to the north of the #1 and #2 buildings. From the day tanks fuel is fed directly to the engines.

Oil for the engines is delivered in 55 gallon barrels at the west side of the #3 building. The barrels are stored in the #3 building with the exception of 3 barrels, one each of SAE40, Heavy Duty Turbine oil and motor oil. These three barrel are stored in the #1 building and used to supply the engine needs in the #1 and #2 building. When a barrel is emptied in the #1 building a new barrel is brought from the #3 building to the #1 building. Empty oil barrels are returned to the vendor.

Used oil is taken to the fuel oil containment area to the west of the #3 building and kept in a waste oil storage tank located inside the containment area. When the storage tank is full an oil reclamation truck is called. The truck parks inside the curbed containment area adjacent to the tank containment field and oil is pumped via hoses from the tank to the truck.

Oil used in the transformers is unloaded in much the same way. Work done on the transformers is contracted out and the oil is filtered and replaced and new oil added if needed.

1.2 City Shop, 1001 Park Road, Washington, Kansas.

The city shop is located at 1001 Park Road, directly to the Northwest of the power plant. The shop consists of a Quonset building divided with a partition wall into a heated and unheated side. A door provides access to either side. The unheated side is used primarily for vehicle storage. The heated side houses the work area, tool storage and record storage and is used for some vehicle storage.

Three 55 gallon barrels of motor oil are stored in the south or heated side on a spill containment pallet and are used as needed for servicing the city's vehicles. Used oil is placed in the waste oil tank inside the containment area directly south of the shop. This is the same waste oil tank as described in Section 1.1 above. Oil is delivered to the south side of the building and the barrels are moved inside. Empty barrels are returned to the vendor. The city shop is open from 8 a.m. to 5 p.m. Monday through Friday Labor Day to Memorial Day. Summer hours are 7 a.m. to 4 p.m. from Memorial Day to Labor Day.

1-3 Road Oil and Transformer Area, 425 Airport Road, Washington, Kansas.

This area is a storage facility for up to 11,750 gallons of road oil and has a concrete pad for the city of Washington's transformer inventory along with the power poles. Transformers are set on the pad by boom truck and removed the same way. If any transformers show any sign of leakage they are placed on oil containment pallets inside the transformer containment area until they can be shipped out for disposal. No oil drums are on site. The transformers contain a cumulative total of approximately 1,414 gallons of oil. The transformers are moved intact with the oil sealed inside. The transformer area is 30 foot by 40 foot with a concrete floor and 1-1/2 inch curb around the perimeter. A rainwater discharge valve is located on the west side of the area. Rainwater can be drained off after it has been determined that there is no oil sheen on the water

in the area by trained personnel. The rainwater discharge valve is padlocked when not in use and keys are in the possession of trained city personnel.

The road oil tank is filled by pumping into the elevated horizontal tank by the truck delivering the road oil. When dispensing the road oil into the oil pot for street repair it is gravity flow and manually operated by city personnel.

The road oil tank is on a slight grade so an earthen berm has been erected to encircle the east, west and south sides for containment and will still allow truck access for loading and unloading. This berm will also contain any spill from the truck.

If an overfill happens it will be contained by the berm.

Chapter 2

Oil Storage Tank Inventory

2-1 Tank #1 and Tank #2

- 9 foot diameter by 25 foot length, horizontal
- Contains #2 diesel fuel – off road.
- 12,000 gallons each 9 foot diameter by 25 foot length, horizontal tank.
- Steel construction.
- Potential failure – overflow, leak
- Failure flow – inside of containment area.
- Containment provisions – Concrete wall containment with concrete floor.
- Electronic overflow alarms.
- Year constructed – unknown.
- Internal inspection – Tank not constructed with access hole. No inspections have been done. These tanks are elevated from the floor of the containment area so visual inspections are made daily.

2-2 Tank #3 and Tank #4

- 10 foot diameter by 26 foot length, vertical.
- Contains #2 diesel fuel – off road.
- 15,000 gallons each 10 foot diameter by 26 foot length, vertical tank.
- Steel construction
- Potential failure – overflow, leak.
- Failure flow – inside of containment area.
- Containment provisions – Concrete wall containment with concrete floor.
- Electronic overflow alarms.

- Year constructed – unknown.
- Internal inspection – Tank not constructed with access hole. No inspections have been done. These tanks are elevated from the floor of the containment area so visual inspections are made daily.

2-3 Waste Oil Tank

- 38” diameter by 60” length.
- Contains used motor oil.
- 300 gallon.
- Steel construction.
- Potential failure – leak.
- Failure flow – inside of containment area.
- Containment provisions – Concrete wall containment with concrete floor.
- No overfill protection needed.
- Year constructed – unknown.
- Internal inspection – No inspections have been done. This tank is elevated from the floor of the containment area so visual inspections are made daily.

2-4 Truck Road Diesel

- 50” diameter by 60” length.
- Contains road diesel #2.
- 500 gallon, horizontal on stand.
- Steel construction.
- Potential failure – leak, overfill.
- Failure flow – inside of containment area.
- Containment provision – Concrete wall containment with concrete floor.

- No overfill protection.
- Year constructed – unknown.
- No inspections have been made to tank. This tank is elevated from the floor of the containment area so visual inspections are made daily.

2-5 Truck Gas Tank

- 5-1/2 foot diameter by 6 foot length.
- Contains unleaded gasoline
- 1,000 gallon, 5-1/2 foot by 6 foot length.
- Steel construction.
- Potential failure – leak, overfill.
- Failure flow – inside containment area.
- Containment Provisions – Concrete wall containment with concrete floor.
- No overfill protection.
- Year constructed – 2000?
- No inspections have been done. This tank is elevated from the floor of the containment area so visual inspections are made daily.

2-6 Road Oil Tank

- 10 foot diameter by 20 foot length.
- Contains road oil
- 171,750 gallon, 10 foot by 20 foot length.
- Steel construction.
- Potential failure – leak, overfill.
- Failure flow – inside bermed area.
- Containment Provisions – Earthen berm.

- No overfill protection.
- Year constructed – unknown?
- No inspections have been done. This tank is elevated from the ground so visual inspections are made.

2-7 Engine Day Tanks

Day Tank #1 (Located north side of building #1 in concrete bunker, covered, also with #2 and #3 day tanks.)

- 2-1/2 foot by 9 foot length.
- Contains #2 diesel oil.
- 250 gallon, 2-1/2 foot by 9 foot, horizontal.
- Steel construction.
- Potential Failure – overfill, leak.
- Failure flow – will stay in concrete bunker until pumped out.
- Containment provision – Covered concrete bunker.
- No overfill protection.
- Year constructed – (1963).
- No inspections have been made.

Day Tank #2

- 2-1/2 foot by 6 foot length.
- Contains #2 diesel oil.
- 150 gallon, 2-1/2 foot by 6 foot length.
- Steel construction.
- Potential failure – overfill, leak.
- Failure flow – will stay in covered concrete bunker.
- Containment – covered concrete bunker.

- No overfill protection.
- Year constructed – unknown (1958).
- No inspections have been made.

Day Tank #3

- 2-1/2 foot by 9 foot length.
- Contains #2 diesel oil.
- 250 gallon, 2-1/2 foot by 9 foot horizontal.
- Steel construction.
- Potential failure – leak, overfill.
- Failure flow – will stay in covered concrete bunker.
- Containment provision – covered concrete bunker.
- No overfill protection.
- Year construction – unknown (1978).
- No inspections have been made.

Day Tank #4 (Located in basement of #3 building)

- 3 foot diameter by 5 foot height.
- Contains #2 diesel oil.
- 275 gallon, 3 foot by 5 foot vertical.
- Steel construction.
- Potential failure – leak, overfill.
- Failure flow – will be contained in basement.
- Containment provision – Floor drains are capped and all spills will remain in basement area until removed.
- No overfill protection.
- Year construction – unknown (1986)

- No inspections have been made. This tank is elevated from the basement floor and visual inspections are made daily.

Day Tank #5 (Located just north of #2 building in covered concrete bunker along with #6 day tank)

- 2-1/2 foot diameter by 9 foot length.
- Contains #2 diesel oil.
- 250 gallon, 2-1/2 foot by 9 foot horizontal.
- Steel construction.
- Potential Failure – leak, overflow.
- Failure flow – will remain in covered concrete bunker until removed.
- Containment provisions – contained in covered concrete bunker.
- No overflow protection.
- Year construction – unknown (1953).
- No inspections have been made.

Day Tank #6

- 2-1/2 foot diameter by 11 foot length.
- Contains #2 diesel oil.
- 300 gallon, 2-1/2 foot by 11 foot horizontal.
- Steel construction.
- Potential failure – leak, overflow.
- Failure flow – will remain in concrete bunker until removed.
- Containment provision – contained in covered concrete bunker.
- No overflow protection.
- Year construction – unknown (1967).
- No inspections have been made.

Day Tank #7 (Located in northwest corner of building #2)

- Rectangular tank, 72 inches by 60 inches by 30 inches.
- Contains #2 diesel oil.
- 560 gallon, 72 inch by 60 inch by 30 inch.
- Steel construction.
- Potential failure – leak, overflow.
- Failure flow – flows into #6 engine pit which has electric sump pump that is normally off. The pump is only activated when trained personnel have determined accumulated water in the pit contains no oil or fuel.
- Containment provision – same as failure flow described above.
- No overflow protection.
- Year construction – unknown (1976).
- No inspections have been made.

Chapter 3

Stored Containers (55 gallons or larger)

3-1 Building #1

Containers	Type of Material	Size	Total Size
3 drums	motor oil	55 gallons each	165 gallons
1 drum	solvent	55 gallons each	55 gallons

All are steel or plastic drums stored in a concrete containment area 70 inches by 41 inches by 10 inches deep. Any failure or leak of the drums will be contained in the concrete area.

3-2 Building #2

None stored in this building.

3-3 Building #3

Containers	Type of Material	Size	Total Size
8 drums	motor oil	55 gallons each	495 gallons
2 drums	deck and shake seal	55 gallons each	110 gallons
1 drum	transformer oil	55 gallons each	55 gallons

All are steel or plastic drums stored on secondary containment pallets. Any failure or leak will be contained by the pallets

Chapter 4

Oil Containing Stationary Equipment

4-1 Building #1

- #1 Engine 1250KW Nordberg, 350 gallons motor oil with 100 gallon oil filter.
- #2 Engine 1000KW Superior, 325 gallons motor oil with 94 gallon oil filter.
- #3 Engine 900KW Fairbanks-Morse, 200 gallons motor oil with 30 gallon oil filter.
- #5 Engine 675KW Fairbanks-Morse, 175 gallons motor oil with 15 gallon oil filter.

- #1 Manual Circuit Breaker 7 gallons transformer oil.
- #2 Manual Circuit Breaker 7 gallons transformer oil.
- #3 Manual Circuit Breaker 7 gallons transformer oil.
- #5 Manual Circuit Breaker 7 gallons transformer oil.

4-2 Building #2

- #6 Engine 1540KW Nordberg, 350 gallons motor oil with 100 gallon oil filter.
- #7 Engine 1136KW Fairbanks-Morse, 250 gallons motor oil with 30 gallon oil filter.
- #7 Manual Circuit Breaker 7 gallons transformer oil.

4-3 Building #3

- #4 Engine 2635KW Nordberg, 1,000 gallons motor oil with 71 gallon oil filter.

**4-4 Equipment within fenced area adjacent to #1 building on the south side.
An area 71 feet by 31 feet.**

5,000 KVA transformer 1620 gallons transformer oil.

Circuit beaker (tie) 60 gallons transformer oil.

Circuit breaker (#4) 60 gallons transformer oil.

Circuit breaker (#6) 60 gallons transformer oil.

Six - reclosers – Feeder 1,2,3,4,5 and 6 - 30 gal. each - 180 gal. total - transformer oil.

3 – 50KVA transformers 20 gal. each – 60 gal. total – transformer oil.

4-5 West of Building #2 is where the #3 building transformer is located.

One – 150 KVA transformer 118 gallons transformer oil

Chapter 5

Discharge Prevention

When a delivery truck is dispensing fuel or gasoline into the storage tanks, the truck shall park in a truck containment area directly to the north side of the tank containment area. This area is 66 feet long and 12 foot wide with a minimum of a 4 inch curb surrounding it on 3 sides and the containment wall on the 4th side. This is a concrete area with a rainwater drain built into the southeast corner. The delivery truck pumps fuel into the storage tanks.

The storage tanks are equipped with level sensors that provide an audio and visual alarm if overfill is imminent. If the alarm sounds the personnel overseeing the delivery can stop the dispensing before an overfill occurs.

The storage tanks are inside a tank containment area that is 66 feet long and 40 feet wide and averages 25 inches in depth. This area has a concrete floor with a rainwater drain built into the southeast corner. All tanks are elevated from the floor for visual inspection on a daily basis.

Fuel is moved from the bulk storage area to the #3 building through 2-1/2" pipe 19 feet, 6 inches long. The pipe is located in a concrete trough 19' 6" long, 1' 10" wide and 9" deep. The trough has a rain water drain located in the southwest corner.

The transformer containment area at 425 Airport Road is 30 foot by 40 foot with a concrete floor and 1-1/2 inch curb around the perimeter. A rainwater discharge valve is located on the west side of the area.

The road oil tank is filled by pumping into the elevated horizontal tank by the truck delivering the road oil. When dispensing the road oil into the oil pot for street repair it is a gravity flow and manually operated by the street personnel.

The road oil tank is on a slight grade so an earthen berm has been erected to encircle the east, west and south sides for containment and will still allow truck access for loading and unloading. This berm will also contain any spill from the truck.

If an overfill happens it will be contained by the berm.

Rainwater is drained from all containment areas only after it has been determined that there is no oil sheen on the water by trained personnel. The rainwater drains are padlocked and the locks are only removed at the time of drainage and immediately replaced after drainage is complete. Keys to the padlocks are in possession of trained city personnel.

All rainwater discharges, daily inspections, deliveries or other actions taken are documented and the documentation kept on file for a minimum three years. Containment areas at the Municipal Power Plant are checked daily. The transformer containment area is checked once a month and after every rainfall.

All buried piping installed or replaced on or after August 16, 2002 will have protective wrapping and coating, and deterioration, and corrective action taken if damaged in any way.

Any accidental overfills will be contained in their respective areas until removed, cleaned and documented.

Chapter 6

Secondary Containment

The tank confinement area is where all the storage tanks are located. The confinement area measures 40 foot by 66 foot by average 25 inch depth. It has concrete walls and a concrete floor with a rainwater drain in the southeast corner to expel clean water. This drain will only be opened by trained personnel after it has been determined that there is no oil sheen on the water. The tanks consist of two 15,000 gallon diesel tanks, two 12,000 gallon diesel tanks, one 300 gallon used oil tank, one 500 gallon road diesel tank and one 1,000 unleaded gas tank.

Directly to the north of this area is the truck unloading area for transferring fuel to the storage tanks and dispensing fuel to the trucks and equipment. This area is 66 feet long and 12 feet wide with a minimum of 4 inches of depth to contain fuel from the largest compartment of a tank truck. This area also has a rainwater drain that is monitored and drained by trained personnel.

Fuel is moved from the bulk storage area to the #3 building through 2-1/2" pipe 19 feet, 6 inches long. The pipe is located in a concrete trough 19' 6" long 1' 10" wide and 9" deep. The trough has a rain water drain located in the southwest corner.

The transformer containment area at 425 Airport Road is 30 foot by 40 foot with a concrete floor and 1-1/2 inch curb around the perimeter. A rainwater discharge valve is located on the west side of the area.

All rainwater drains are kept padlocked and the locks are only removed at the time of drainage and immediately replaced after drainage is complete. Keys to the padlocks are in possession of trained city personnel.

The road oil tank is filled by pumping into the elevated horizontal tank by the truck delivering the road oil. When dispensing the road oil into the oil pot for street repair it is a gravity flow and manually operated by the street personnel.

The road oil tank is on a slight grade so an earthen berm has been erected to encircle the east, west and south sides for containment and will still allow truck access for loading and unloading. This berm will also contain any spill from the truck.

If an overfill happens it will be contained by the berm.

The Power Plant building has been divided in our description due to the drainage system.

The #1 building contains four diesel generators, four oil filters, four 55 gallon drums of oil and four manual circuit breakers. Total oil in this building is 1537 gallons. All floor drains dispense into the #1 Engine pit which is equipped with a sump pump that has a shut-off switch that is normally in the off position. The sump pump is not operated until trained personnel have determined that water accumulated in the pit contains no oil or fuel. Water is then pumped out of the building into the city sewer and the pump shut off.

Building #2 has two diesel generators, two oil filters, one diesel day tank and one manual circuit breaker. Total oil in this building area is 1297 gallons. Everything drains into #6 Engine pit and this pit has a sump pump with a shut-off switch on the control board so that it will not operate until trained personnel have determined that there is no oil in the pit.

Building #3 has one diesel generator, one oil filter, one diesel day tank and eleven drums of oil. Total oil in this building is 2401 gallons. All floor drains in basement area have been capped. If it becomes necessary to drain water in this area, a cap can be removed by trained personnel if it has been determined that no oil is in this area. The basement area will contain everything in building #3.

Two concrete bunkers with covers house the remaining five diesel day tanks.

The first or east bunker has three diesel day tanks in it with total capacity 650 gallons. Bunker size is 10 foot by 11 foot by 7 foot height. The bunker is constructed with a concrete floor and walls with covers so no rainwater gets into it.

The second or west bunker has two diesel day tanks in it with total capacity 550 gallons. Bunker size is 7 foot by 13 foot by 7 foot height. The bunker is constructed with a concrete floor and walls with covers so no rainwater gets into it.

The substation at the power plant is curbed on the east, north and south sides to contain any spill or leak from the transformers.

Chapter 7

Description of Countermeasures

In the event of any type of spill, call 911.

Report:

- What was spilled.
- How much spilled (approximately).
- If material is contained in one location.
- If material is on fire.

Responding Agencies (Local):

- Local Fire Department.
- Law Enforcement.
- Emergency Management.
- EMS.

Oil absorbent pads are kept on hand in the #3 building for use by city personnel.

Fire Department will work to contain spill until clean up is complete. If no containment area/wall is present, absorbent pads, sandbags, will be used to prevent further contamination of soil or water.

Sand bags are available through the Emergency Management Office or Noxious Weed/Solid Waste Department.

If local cleanup is conducted, equipment is available through the City or County Public Works Departments.

Chapter 8

Planned Disposal Methods

Disposal method depends on the substance spilled and the quantity spilled.

For a small amount of gas or oil, it can be taken to a designated place approved by KDHE, and spread out to aerate.

For larger quantities, it may have to be put in barrels and taken to a disposal site approved to accept contaminated soil/water, or if a Hazmat Cleanup Company was called they will take care of disposal.

Chapter 9

Contacts

National Response Center	1-800-424-8802
Environmental Protection Agency (EPA)	1-913-281-0991
Hazmat Response contractors	
Fire Rescue Consultants LLC	1-785-770-7368
Manhattan, KS	1-785-564-3179
	(24 hour pager)
Haz-Mat Response, Inc	1-913-782-5151
	(ext. 243)
Olathe, KS or	1-800-229-5252
Kansas Dept. of Health and Environment	1-785-296-1679
after hours & week-ends	1-785-296-0614
Kansas Division of Emergency Management	1-800-275-0297
or	1-785-296-8013
Kansas Emergency Response Commission	1-785-296-1690
Kansas State Fire Marshall	1-785-296-3401
Washington County Emergency Management	1-785-325-2134
	(or 911)
Washington County Local Emergency	1-785-325-2134
Planning Committee	(or 911)
Washington County Sheriff	1-785-325-2293
	(or 911)
Washington City Fire Department	911
City of Washington Utility Emergency phone	1-725-541-1313

Chapter 10

Persons Accountable at Each Facility

10-1 Power plant and tank containment area:

Mary Leck Power plant phone: 785-325-2231
 Home phone: 785-325-2772
 Cell phone: 785-747-7431

10-2 Maintenance shop, road oil tank area and transformer storage on Airport Road

Barry Finlayson Power plant phone: 785-325-2231
 Home phone: 785-325-2102
 Cell phone: 785-747-8041

10-4 City Administrator

Kurt Hassler Office phone: 785-325-2284
 Cell phone: 785-541-1211

Chapter 11

Tests and Inspections

There have been no tests or inspections done. No tanks here have manholes for interior inspections. All tanks are elevated so that any leakage can be found by daily visual inspections.

Chapter 12

Personnel Training

Monthly safety meetings which include confined spaces, safety, MSDS, hazardous materials are provided through the Kansas Municipal Utilities Utility Safety Program in which the City of Washington participates. All employees are trained in their specific departments as to operations of all equipment including fuel and oil transfer and disposal of each.

Chapter 13

Security Measures

A chain link fence surrounds the containment area 60 inches high from the top of the containment wall with one locked swing gate and one locked rolling gate. The area is illuminated at night

The transformer pad is surrounded by a chain link fence 72 inches high and has one locked double gate for loading and unloading and a locked single swing gate for access by personnel. All buildings are locked during off hours and are well illuminated.

Chapter 14

Spill History

No spills reported.