

Spill Prevention, Control and Countermeasure Plan

Cheyenne Regional Airport

Cheyenne, Wyoming

SEH No. CHEYE106527

May 2011

| EMERGENCY NUMBERS | |
|--|---|
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| Assistant Airport Manager Tim Reid, C.M. | (307) 634-7071(Work) (307) 630-4161 (Cell) |
| Great Lakes Aviation Jason Entner | (307) 432-7180 (Work) |
| Sky Harbor Air Service Paul Martin | (307) 634-4417 (Work) |
| Cheyenne Police Department | 911 (24 hour emergency) (307) 637-6500 (non-emergency) |
| Cheyenne Fire Department | 911 (24 hour emergency) (307) 637-6311 (non-emergency) |
| Wyoming Department of Environmental Quality | (307) 777-7781 (24 hour emergency) |
| USEPA Regional Administrator | (800) 227-8917 (24 hour emergency) |
| National Response Center | (800) 424-8802 (24 hour emergency) |

Cheyenne Regional Airport SPCC Plan Management Approval

The Cheyenne Regional Airport (CRA) is committed to the prevention of discharges of oil to navigable waters and the environment. The CRA maintains high standards for spill prevention, control and countermeasures through regular review, updating and implementation of this Spill Prevention, Control and Countermeasure (SPCC) plan for the fuel facility located in Cheyenne, Wyoming. I hereby certify that the CRA will commit the necessary resources to implement this SPCC plan and the manpower, equipment and materials required to expeditiously control or remove any harmful quantity of oil discharge.

Signature: _____
Name: David S. Haring, C.M.
Title: Airport Manager
Date: _____

Professional Engineer Certification

I hereby certify that I am familiar with the provisions of 40 CFR 112; that I or my agent have visited and examined the facility; that this SPCC plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards and with the requirements of 40 CFR 112.3; that procedures for required inspections and testing have been established; and that the SPCC plan is adequate for the facility.

Eric C. McClure, PE
Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

Registration No. 12500 State WY

Date: _____

**Certification of the Applicability of the
Substantial Harm Criteria Checklist (C-II Form)
See Appendix A**

Plan Amendments

| | |
|-------------------------------|--|
| Amendment Number: | 001 |
| Amendment Description: | |
| PE Certification: | By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCC plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards and with requirements of this Part, that procedures for required inspections and testing have been established and that the Plan is adequate for the facility. |
| Engineer: | |
| Signature: | |
| Registration Number: | |
| State: | |
| Date: | |
| Management Signature: | |
| Date: | |

Plan Amendments (Continued)

| | |
|-------------------------------|--|
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| Engineer: | |
| Signature: | |
| Registration Number: | |
| State: | |
| Date: | |
| Management Signature: | |
| Date: | |

Plan Amendments (Continued)

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| Engineer: | |
| Signature: | |
| Registration Number: | |
| State: | |
| Date: | |
| Management Signature: | |
| Date: | |

Plan Amendments (Continued)

| | |
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| Engineer: | |
| Signature: | |
| Registration Number: | |
| State: | |
| Date: | |
| Management Signature: | |
| Date: | |

Plan Amendments (Continued)

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| Engineer: | |
| Signature: | |
| Registration Number: | |
| State: | |
| Date: | |
| Management Signature: | |
| Date: | |

Table of Contents

Management Approval
Professional Engineer Certification
Certification of the Applicability of the Substantial Harm Criteria Checklist (C-II Form)
Review Page
Plan Amendments
Table of Contents

| | Page |
|--|-------------|
| 1.0 Introduction | 1 |
| 1.1 General Applicability – 40 CFR 112.1 | 1 |
| 1.2 Requirement to Prepare and Implement a SPCC Plan – 40 CFR 112.3..... | 2 |
| 1.3 Amendment of SPCC Plan | 3 |
| 1.3.1 Amendment by USEPA Regional Administrator– 40 CFR 112.4 | 3 |
| 1.3.2 Amendment by Owners or Operators– 40 CFR 112.5 | 3 |
| 1.4 Cross Reference with SPCC Provisions - 40 CFR 112.7 | 4 |
| 1.5 Necessary Alterations to Implement the SPCC Plan – 40 CFR 112.7 | 5 |
| 2.0 Implementation – 40 CFR 112.7 | 6 |
| 3.0 Facility Information – 40 CFR 112.7(a) | 7 |
| 3.1 Compliance with SPCC Requirements – 40 CFR 112.7(a)(1 & 2) | 7 |
| 3.2 Facility Description – 40 CFR 112.7(a)(3) | 7 |
| 3.3 Facility Site Description – 40 CFR 112.7(a)(3) | 7 |
| 4.0 Oil Storage – 40 CFR 112.7(a)(3)(i) | 8 |
| 4.1 Fuel Facility | 8 |
| 4.1.1 Operations..... | 8 |
| 4.1.2 Above Ground Storage Tanks..... | 9 |
| 4.1.3 Drums..... | 9 |
| 4.1.3.1 CRA Maintenance Building | 9 |
| 4.1.3.2 Sky Harbor Air Service..... | 9 |
| 4.1.3.3 Great Lakes Aviation..... | 9 |
| 4.1.4 Underground Storage Tanks | 10 |
| 4.1.5 Vehicle | 10 |
| 4.2 Total Oil Storage – 40 CFR 112.7(a)(3)(i) | 11 |
| 5.0 Discharge Prevention and Control | 11 |
| 5.1 Discharge Prevention – 40 CFR 112.7(a)(3)(ii) | 11 |
| 5.2 Discharge and Drainage Controls – 40 CFR 112.7(a)(3)(iii) | 12 |
| 6.0 Emergency Discharge Procedures | 12 |
| 6.1 Discharge History | 12 |
| 6.2 Discharge Discovery, Response And Clean-Up – 40 CFR 112.7(a)(3)(iv) and (a)(5)..... | 12 |
| 6.2.1 Response to a Minor Discharge | 13 |
| 6.2.2 Response to a Major Discharge | 13 |
| 6.3 Oil Disposal – 40 CFR 112.7(a)(3)(v) | 15 |

Table of Contents (Continued)

| | | |
|-------------|---|-----------|
| 6.4 | Emergency Contacts – 40 CFR 112.7(a)(3)(vi) | 15 |
| 6.5 | Discharge Reporting – 40 CFR 112.7(a)(4)..... | 15 |
| 6.6 | Discharge Response Procedures – 40 CFR 112.7(a)(5)..... | 17 |
| 7.0 | Potential Tank and Equipment Failures – 40 CFR 112.7(b) | 17 |
| 7.1 | Bulk Fuel Storage | 17 |
| 7.1.1 | Generator Day tanks (AST-1 and AST-2) | 17 |
| 7.1.2 | Unloading/Loading Areas (Great Lakes Aviation and Sky Harbor Air Service) | 18 |
| 7.1.3 | Above Ground Piping (Great Lakes Aviation and Sky Harbor Air Service) | 18 |
| 8.0 | Containment, Inspections and Security Requirements | 19 |
| 8.1 | Containment and Diversionary Structures – 40 CFR 112.7(c)(1)..... | 19 |
| 8.2 | Demonstration of Practicability – 40 CFR 112.7(d) | 20 |
| 8.3 | Inspections, Tests, and Records – 40 CFR 112.7(e) | 20 |
| 8.3.1 | Daily Inspection | 21 |
| 8.3.2 | Quarterly Inspection | 21 |
| 8.3.3 | Annual Inspection..... | 22 |
| 8.4 | Personnel Training and Discharge Prevention – 40 CFR 112.7(f) | 22 |
| 8.5 | Security – 40 CFR 112.7(g)..... | 23 |
| 8.6 | Facility Tank Truck Unloading – 40 CFR 112.7(h) | 23 |
| 8.6.1 | Secondary Containment (40 CFR 112.7(h)(1)) | 23 |
| 8.6.2 | Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3)) | 24 |
| 8.7 | Field Constructed Tanks – 40 CFR 112.7(i) | 24 |
| 8.8 | Additional Requirements – 40 CFR 112.7(j)..... | 24 |
| 9.0 | Facility Drainage – 40 CFR 112.8(b)..... | 25 |
| 9.1 | Diked Areas – 40 CFR 112.8(b)(1)..... | 25 |
| 9.2 | Drainage Valves – 40 CFR 112.8(b)(2)..... | 25 |
| 9.3 | Undiked Area Drainage – 40 CFR 112.8(b)(3)..... | 25 |
| 9.4 | Diversion System – 40 CFR 112.8(b)(4) | 25 |
| 9.5 | Facility Drainage Systems – 40 CFR 112.8(b)(5)..... | 25 |
| 10.0 | Bulk Storage Tanks – 40 CFR 112.8(c) | 25 |
| 10.1 | Tank Compatibility – 40 CFR 112.8(c)(1)..... | 25 |
| 10.2 | Tank Secondary Containment – 40 CFR 112.8(c)(2) | 25 |
| 10.3 | Rainwater Drainage – 40 CFR 112.8(c)(3)..... | 26 |
| 10.4 | Buried Metallic Storage Tanks – 40 CFR 112.8(c)(4)..... | 26 |
| 10.5 | Partially Buried Metallic Storage Tanks – 40 CFR 112.8(c)(5)..... | 26 |
| 10.6 | Tank Testing – 40 CFR 112.8(c)(6)..... | 26 |
| 10.7 | Internal Tank Heating Coils – 40 CFR 112.8(c)(7) | 27 |
| 10.8 | Good Engineering Practices – 40 CFR 112.8(c)(8)..... | 27 |
| 10.9 | Plant Effluents – 40 CFR 112.8(c)(9) | 27 |
| 10.10 | Visible Oil Discharges – 40 CFR 112.8(c)(10)..... | 27 |

Table of Contents (Continued)

| | |
|---|-----------|
| 10.11 Mobile or Portable Tanks – 40 CFR 112.8(c)(11)..... | 27 |
| 11.0 Facility Transfer Operations, Pumping, and Facility Process – 40 CFR 112.8(d).. | 27 |
| 11.1 Underground Piping – 40 CFR 112.8(d)(1) | 27 |
| 11.2 Out of Service Piping – 40 CFR 112.8(d)(2)..... | 27 |
| 11.3 Piping Supports – 40 CFR 112.8(d)(3) | 28 |
| 11.4 Valve and Piping Inspections – 40 CFR 112.8(d)(4) | 28 |
| 11.5 Vehicle Warnings – 40 CFR 112.8(d)(5) | 28 |
| 12.0 Non-Applicable Portions of the SPCC Regulations | 28 |

List of Figures

Figure 1 –Location Map
Figure 2 - Layout Plan

List of Tables

Table 1 - Above ground Storage Tank Descriptions
Table 2 - Underground Storage Tank Descriptions

List of Appendices

Appendix A Certification of the Applicability of the Substantial Harm Criteria Checklist (C-II Form)
Appendix B WYDOT, NWS and WYANG SPCC Plans
Appendix C Inspection and Training Records

Spill Prevention, Control and Countermeasure Plan

Cheyenne Regional Airport

Prepared for Cheyenne Regional Airport

1.0 Introduction

The Cheyenne Regional Airport (CRA) is a publicly owned airport facility located at 4000 Airport Parkway in Cheyenne, Wyoming. The facility encompasses approximately 1,000 acres and includes two runways, taxiways, ramps, a terminal, several hangars, maintenance buildings and offices.

Many of the buildings on the airport property are leased to private entities. The lessee's that store petroleum products regulated under the Code of Federal Regulations, Title 40 (40 CFR) Parts 110 through 112 include the CRA, Wyoming Department of Transportation (WYDOT), the National Weather Service (NWS), Wyoming Air National Guard (WYANG), Great Lakes Aviation and Sky Harbor Air Service. However, for the purpose of this Spill Prevention, Control and Countermeasure (SPCC) plan only those regulated petroleum products owned, maintained and operated directly by the CRA, Great Lakes Aviation and Sky Harbor Air Service are addressed in this SPCC plan. The WYDOT, NWS and WYANG facilities are covered by their own engineer approved SPCC plans. Copies of these plans are included in **Appendix B**.

A SPCC plan is designed to complement existing laws, regulations, rules, standards, policies and procedures pertaining to safety standards, fire prevention and pollution prevention rules, including but not limited to the Toxic Substance Control Act (TSCA) requirements.

1.1 General Applicability – 40 CFR 112.1

The U.S. Environmental Protection Agency (USEPA) has established regulations for oil pollution prevention in the 40 CFR Parts 110 through 112. The regulations require that a SPCC plan be prepared if it could reasonably be expected that a harmful quantity of oil could be discharged into navigable waters of the United States (U.S.) or adjoining shorelines. The SPCC regulations apply to owners or operators of facilities that meet the following three primary criteria:

-
- The facility must be non-transportation related and engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using or consuming oil and oil products.
 - The facility must have an aggregate above ground storage capacity greater than 1,320 gallons (excluding those tanks and oil filled equipment below 55 gallons in capacity, the capacity of a container that is “permanently closed”, and the capacity of a “motive power container”) or an aggregate underground storage capacity greater than 42,000 gallons (excluding those that are currently subject to all of the technical requirements of 40 CFR Part 280 or all of the technical requirements of state programs approved under 40 CFR Part 281).
 - There must be reasonable expectation that, due to its location, the facility could discharge oil into or upon the navigable waters of the U.S. or adjoining shorelines.

1.2 Requirement to Prepare and Implement a SPCC Plan – 40 CFR 112.3

A facility that was in operation on or before August 16, 2002, must maintain its SPCC plan, make any necessary amendments to the Plan and fully implement it by November 10, 2011. The original SPCC rule was amended in July 2002 and December 2006. On December 5, 2008, the USEPA amended the SPCC rule to provide clarity, tailor requirements to particular industry sectors, and streamline requirements as appropriate in order to encourage greater compliance with the SPCC regulations. On November 5, 2009 the USEPA Administrator signed a notice amending the December 2008 amendment. Among other things that may be applicable to the CRA the December 2009 amendments, effective January 14, 2010, address the following:

- Clarity on the general secondary containment requirements.
- Flexibility in the use of the industry standards to comply with integrity testing requirements.
- Additional flexibility in meeting the facility diagram requirements.
- Clarification on the flexibility provided by the definition of “facility.”
- Define a loading/unloading rack.
- Provided additional options for self-certification of a subset of qualification facilities.

The USEPA requires that a complete copy of the SPCC plan be maintained at the facility if it is attended at least four hours per day or at the nearest office if the facility is not attended. In accordance with 40 CFR 112.3(e), a complete copy of this SPCC plan is maintained at the CRA office. A copy will also be kept in the Great Lakes Aviation and Sky Harbor Air Service offices. The facility management must make the plan available to the

Regional Administrator (RA) of the USEPA for onsite review during normal working hours.

1.3 Amendment of SPCC Plan

1.3.1 Amendment by USEPA Regional Administrator– 40 CFR 112.4

The regulations require that a report must be sent to the USEPA RA within 60 days of a single discharge of more than 1,000 gallons or two discharges of 42 gallons or more (counting only the amount that reaches navigable waters of the U.S. or adjoining shorelines) each from the same facility within a year. A complete copy of the information (further discussed in Section 6.5) provided to the USEPA should also be forwarded to the Wyoming Department of Environmental Quality (WYDEQ) Water Quality Division.

Upon review of the facility SPCC plan, the RA may propose in writing, specific amendments to the SPCC plan. Within 30 days of a notice, CRA would have 30 days to submit written information, views and arguments to the proposed amendments. Upon consideration of all relevant information, the RA must notify CRA of any amendment required or rescind the notice. If amendments are required, CRA must amend the SPCC plan within 30 days of the notice, unless the RA, for good cause, specifies another date. The amended SPCC plan must be implemented as soon as possible, but no longer than six months following completion of the amendment, unless the RA specifies another date.

1.3.2 Amendment by Owners or Operators– 40 CFR 112.5

The SPCC plan must be reviewed and amended by CRA, if necessary, every five years and any time there is a change in the facility design, construction, operation or maintenance that materially affects its potential for discharge. 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 may alter secondary containment structures
- Changes of product or service
- Revision of standard operating procedures or maintenance procedures at the 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.

The USEPA requires that a registered professional engineer certify all SPCC plans and technical amendments for it to be effective to satisfy the requirements of 40 CFR Part 112.3. However, such certification in no way relieves CRA's duty to prepare and fully implement the Plan in accordance with the requirements of 40 CFR Part 112. If the facility does not experience

any changes in the facility design, construction, operation or maintenance that materially affects its potential for a discharge within the five-year review period, the facility manager can perform the five-year review. If the review indicates that new technologies will offer significantly improved discharge prevention and control, the new technologies should be implemented and included in the SPCC plan or an amendment to the plan.

1.4 Cross Reference with SPCC Provisions - 40 CFR 112.7

This SPCC plan does not follow the exact order presented in 40 CFR Part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC rule. The following table presents a cross-reference of Plan sections relative to applicable parts of 40 CFR Part 112.

| Provision | Description | Section |
|--------------|--|---------------|
| 112.3(d) | Professional Engineer Certification | Front |
| 112.3(e) | Location of SPCC Plan | 1.2 |
| 112.5 | Plan Review | Front and 1.3 |
| 112.7 | Management Approval | Front and 1.6 |
| 112.7 | Cross-Reference with SPCC Rule | 1.5 |
| 112.7(a)(3) | General Facility Information | 3.0 – 3.3 |
| 112.7(a)(4) | Discharge Notification | 6.5 |
| 112.7(a)(5) | Discharge Response | 6.2 and 6.6 |
| 112.7(b) | Potential Discharge Volumes and Direction of Flow | 7.0 – 7.4 |
| 112.7(c) | Containment and Diversionary Structures | 8.1 |
| 112.7(d) | Practicability of Secondary Containment | 8.2 |
| 112.7(e) | Inspections, Tests, and Records | 8.3 |
| 112.7(f) | Personnel, Training and Discharge Prevention Procedures | 8.4 |
| 112.7(g) | Security | 8.5 |
| 112.7(h) | Tank Truck Loading/Unloading | 8.6 |
| 112.7(i) | Brittle Fracture Evaluation | 8.7 |
| 112.7(j) | Conformance with Applicable State and Local Requirements | 8.8 |
| 112.8(b) | Facility Drainage | 9.0 |
| 112.8(c)(1) | Construction | 10.1 |
| 112.8(c)(2) | Secondary Containment | 10.2 |
| 112.8(c)(3) | Drainage of Diked Areas | 10.3 |
| 112.8(c)(4) | Corrosion Protection | 10.4 |
| 112.8(c)(5) | Partially Buried and Bunkered Storage Tanks | 10.5 |
| 112.8(c)(6) | Inspection | 10.6 |
| 112.8(c)(7) | Heating Coils | 10.7 |
| 112.8(c)(8) | Overfill Prevention System | 10.8 |
| 112.8(c)(9) | Effluent Treatment Facilities | 10.9 |
| 112.8(c)(10) | Visible Discharges | 10.10 |
| 112.8(c)(11) | Mobile and Portable Containers | 10.11 |
| 112.8(d) | Transfer Operations, Pumping and In-Plant Processes | 11.0 – 11.5 |
| 112.20(e) | Certification of Substantial Harm Determination | Appendix A |

1.5 Necessary Alterations to Implement the SPCC Plan – 40 CFR 112.7

Implementation of the SPCC plan is contingent upon implementing the following practices and making the following facility alterations:

- The SPCC rule requires inspection and testing of each above ground storage tank (AST) or container for integrity on a regular basis (40 CFR 112.8(c)(6)). However, the SPCC rule provides flexibility regarding integrity testing requirements of bulk storage containers as long as the alternatives provide equivalent environmental protection per 40 CFR 112.7(a)(2). For certain shop-built containers with a shell capacity of 30,000 gallons or under, the USEPA considers that visual inspection provides equivalent environmental protection when accompanied by certain additional actions to ensure that the containers are not in contact with soil.

As the ASTs at the CRA are not in contact with soil, the facility must document the regularly scheduled visual inspection of the integrity of the tank exterior and tank base.

- Clearly post emergency response procedures and contact information in areas of potential spills (near ASTs and loading/unloading pads).
- AST-2 is located within the Lighting Vault building and does not currently have secondary containment. A large spill has the potential to exit the building and would flow north downhill toward Dry Creek. Secondary containment for AST-2 within the Lighting Vault building should be provided to contain a release within the building. This should be in the form of a curb or hump placed near the entrance so that any spill would be contained within the building.

I hereby acknowledge that I have reviewed Section 1.5 and understand that several facility improvements are required to fully implement this SPCC Plan.

Name

Date

2.0 Implementation – 40 CFR 112.7

It is the responsibility of the Owner to keep the SPCC plan current, on file and available upon request by authorized officials. The SPCC plan must be reviewed every five years and amended when necessary.

The Owner must approve, sign and implement the SPCC plan as soon as possible. The Owner is responsible for training the appropriate employees in the procedures set forth in this Plan.

3.0 Facility Information – 40 CFR 112.7(a)

Facility Name: Cheyenne Regional Airport
Facility Operations: Regional Airport
Facility Address: 4000 Airport Parkway
Cheyenne, WY 82001
Facility Owner: Publicly-Owned (Cheyenne Regional Airport Board)
Contact Name: David Haring
Telephone Number: (307) 634-7071

3.1 Compliance with SPCC Requirements – 40 CFR 112.7(a)(1 & 2)

Upon implementation or completion of the items listed in Section 1.5 of this document, the facility will be in conformance with the applicable requirements of 40 CFR Part 112.7 with the exception of 40 CFR 112.8(c)(6) regarding integrity testing. No other deviations to the SPCC regulation are employed or claimed in this Plan. Pursuant to 40 CFR 112.7(a) (2), the following states the reasons for nonconformance and describes the alternate methods used to achieve equivalent environmental protection.

The ASTs, drums and containment are to be inspected regularly. Any leakage and/or damage would be detected visually during scheduled visual inspections by facility personnel. A description of these containers is provided in Section 4.1 and inspection and testing requirements are further discussed in Sections 8.3 and 10.6.

The facility is in conformance with the requirements of this SPCC plan at the time of its preparation. The SPCC plan must be reviewed and revised, if necessary, every five years and any time there is a change at the facility that materially affects its oil discharge potential.

3.2 Facility Description – 40 CFR 112.7(a)(3)

The CRA was originally constructed and completed in 1920. Maps showing the facility location, layout and building locations are included as **Figure 1**, “Location Map” and **Figure 2**, “Layout Plan.”

3.3 Facility Site Description – 40 CFR 112.7(a)(3)

The site is located at 4000 Airport Parkway, Cheyenne, Wyoming within the S ½ of Section 19, the S ½ of Section 20, the NW ¼ of Section 28, the N ½ of Section 29 and Section 30, Township 14N, Range 66W in Laramie County. The site’s latitude is approximately 41 degrees, 09 minutes and 20.3000 seconds north and longitude is 104 degrees, 48 minutes and 37.7000 seconds west. The facility is located on approximately 1,000 acres of land within city limits.

Access to the facility by vehicle traffic is gained through several gates: one off of Evans Avenue near the Airport Operations Building (most commonly used for fuel deliveries) and at the Great Lakes Aviation and WYDOT hangars. The facility and surrounding topography is relatively flat. As shown on **Figure 2**, the closest bodies of water to the facility are Sloans Lake west

of the airport across Central Avenue and Dry Creek to the north of the facility. Surface water from a rain event discharges to infiltration ponds that are located to the north, south (east of Airport Parkway) and east of the airport on airport property as shown on **Figure 2**.

4.0 Oil Storage – 40 CFR 112.7(a)(3)(i)

The following sections provide details on the number of containers, container contents, volume capacity of each container and secondary containment provisions for each container. The other oil storage containers, subject to SPCC requirements maintained within the CRA are covered under the individual lessee SPCC plans included as **Appendix B**.

4.1 Fuel Facility

4.1.1 Operations

The underground storage tanks (USTs) at Great Lakes Aviation and CRA/Sky Harbor Air Service receive fuel via tanker trucks, which is then dispensed to planes. At Great Lakes Aviation, tanker trucks are off loaded within the spill containment pad. When a plane needs fuel it is parked on the concrete directly adjacent to the spill containment pad and a hose is brought from the dispenser and connected directly to the plane.

At the CRA/Sky Harbor Air Service, off loading of tanker trucks and loading of refuelers at the USTs takes place through remote fill pipes. Vehicles are parked within the spill containment pad when using the tanker and refueler truck pumps. When a plane requests fuel, the refueler trucks from Sky Harbor Air Service drive out to the plane on the apron adjacent to the hangar. The driver then connects to the plane's fuel tank(s) with a quick connect coupling and proceeds to fuel the plane. The refueler trucks are equipped with a spill kit to contain and clean-up potential spills that may happen during the refueling process. In the event of a major spill or catastrophic event, the WYANG emergency response unit is called and can respond quickly. When fueling is complete, the refueler truck is driven back to pick up another load of fuel or parked on an impervious concrete surface.

The generator day tanks, AST-1 and AST-2, are filled via refueler trucks on an as needed basis. The generators that these tanks serve are for back-up use only; as such they potentially go months between refilling.

4.1.2 Above Ground Storage Tanks

The following ASTs (**Table 1**) operated and maintained by the CRA are subject to SPCC regulations.

Table 1. Above ground Storage Tank Descriptions

| Tank ID | Description | Location | Capacity (Gal.) | Install Date | Product Stored | Secondary Containment |
|---------|------------------|--|-----------------|--------------|----------------|---|
| AST-1 | Steel (Day Tank) | Attached to the generator located on the south side of the Air Traffic Control Tower | 2,000 | 2003 | Diesel | Concrete Dike |
| AST-2 | Steel (Day Tank) | Attached to the generator within the Lighting Vault building north of Runway 9/27 | 2,000 | 2000 | Diesel | None-located within the Lighting Vault building |

4.1.3 Drums

All containers with a capacity of 55 gallons or greater are subject to SPCC regulations. The following locations include potential use of 55 gallon drums.

4.1.3.1 CRA Maintenance Building

Four- 55 gallon oil drums used for servicing ground equipment and one-55 gallon drum used to store waste oil are located within the CRA maintenance building. Three of the four oil drums that are in use are stored in a rack with a drip pad underneath. The waste oil from the one drum is taken to a local recycling facility when it is full. The floor of the maintenance building is concrete, so any major spill would be contained within the building. If a spill were to reach the drains within the building, it would be directed to an oil-water separator before it is sent to the City of Cheyenne's Board of Public Utilities (BOPU) Water and Sewer Department. The oil-water separator has more than enough volume capacity to handle a spill from all the drums stored at the CRA maintenance building. Due to the unknown frequency and the nature of the service work performed, the total number of drums stored in this building can fluctuate depending on circumstances.

4.1.3.2 Sky Harbor Air Service

No oil drums are currently located at the Sky Harbor Air Service.

4.1.3.3 Great Lakes Aviation

Great Lakes Aviation periodically stores oils and hydraulic fluids in 55-gallon drums within its hangar. Quantities fluctuate and are brought in on an as needed basis. 55-gallon drums are stored on containment pallets.

A 55-gallon drum for the storage of waste fuel is located on a containment pallet near the UST dispenser cabinet. The waste oil from this drum is taken to a local recycling facility when it is full. The floor of the Great Lakes Aviation hangar is concrete, so any major spill would be contained within the building. If a spill were to reach the drains within the building, it would be directed to an oil-water separator before it is sent to the City of Cheyenne's BOPU Water and Sewer Department. The oil-water separator has more than enough volume capacity to handle a spill from the drums stored at Great Lakes Aviation.

4.1.4 Underground Storage Tanks

The following USTs are on the CRA property and owned by the CRA but either maintained and/or operated by Great Lakes Aviation and Sky Harbor Air Service. However, UST-5 and UST-6 are operated by CRA. These tanks are regulated at the state level by the WYDEQ's Storage Tank Program under Wyoming Statute 35-11 Article 14 (Storage Tank Act of 2007) and are also regulated by the SPCC regulations since the aggregate underground storage capacity is greater than 42,000 gallons.

Table 2. Underground Storage Tank Descriptions

| Tank ID | Description | Location | Capacity (Gal.) | Install Date | Product Stored | Secondary Containment | Piping |
|---------|-------------|----------------------|-----------------|--------------|----------------|-------------------------|--------|
| UST-1 | Steel | CRA Fuel Farm | 12,000 | 4/1/1991 | Jet-A/Avgas | Concrete dike with sand | Steel |
| UST-2 | Steel | CRA Fuel Farm | 12,000 | 4/1/1991 | Jet-A | Concrete dike with sand | Steel |
| UST-3 | Steel | CRA Fuel Farm | 12,000 | 4/1/1991 | Jet-A | Concrete dike with sand | Steel |
| UST-4 | Steel | CRA Fuel Farm | 12,000 | 4/1/1991 | Jet-A | Concrete dike with sand | Steel |
| UST-5 | Steel | CRA Fuel Farm | 8,000 | 4/1/1991 | Diesel | Concrete dike with sand | FRP |
| UST-6 | Steel | CRA Fuel Farm | 8,000 | 4/1/1991 | Unleaded | Concrete dike with sand | FRP |
| UST-7 | Steel | Great Lakes Aviation | 12,000 | 7/1/2000 | Jet-A | Concrete dike with sand | Steel |

4.1.5 Vehicle

A motive power container is any onboard bulk storage container used primarily to power the movement of a motor vehicle, or ancillary onboard oil-filled operational equipment (aircraft, ground service vehicles). Motive power containers are exempt from SPCC regulations. However, Great Lakes Aviation and Sky Harbor Air Service store motive power containers on an impervious concrete surface where a discharge would likely be unable to reach navigable waters of the U.S. The transfer of fuel or other oil into the aircraft at this facility is not exempt from the regulations and is covered by this SPCC plan.

Mobile refuelers are defined as "bulk storage containers, onboard a vehicle or towed, that are designed or used solely to store and transport fuel for transfer into or from an aircraft, motor vehicle, locomotive vessel, ground service equipment or other oil storage container." Sky Harbor Air Service operates three (3) mobile refueler trucks used in the fueling of airplanes. Two of the trucks (T-1 and T-2) are International 47000-T444E with a single 3,000 gallon capacity tank that carries Jet-A fuel. The third truck (T-3) is an Isuzu NPR with a single 750 gallon capacity tank that carries 100 low lead gasoline.

The mobile refuelers at Sky Harbor Air Service are exempt from the specifically sized secondary containment requirements for bulk storage containers specified in 40 CFR 112.8(c) (2) and 40 CFR 112.8(c) (11). However, when not in operation these trucks are locked and parked south of the Sky Harbor Air Service terminal. If an unattended spill were to occur, it would be contained within wastewater drains. The truck keys are stored in the company office when not in use. The fuel haulers for Sky Harbor Air Service use a tanker delivery truck with a maximum storage capacity of 9,000 gallons.

4.2 Total Oil Storage – 40 CFR 112.7(a)(3)(i)

The total fuel storage capacity at CRA up to 86,750 gallons includes seven (7) USTs, two (2) ASTs and three (3) refueler trucks, at any given time, that are subject to SPCC requirements. The total capacity does not include 55-gallon oil or hydraulic fluid drums in the maintenance building or hangars, as these fluctuate on an as needed basis.

5.0 Discharge Prevention and Control

The following sections describe the procedures followed at the facility to minimize the potential of oil discharges to navigable waters of the U.S. and the controls in place to minimize the potential of migration of oil to navigable waters of the U.S. in the event a discharge occurs.

5.1 Discharge Prevention – 40 CFR 112.7(a)(3)(ii)

All equipment and piping at the ASTs, the Great Lakes Aviation fueling area and the CRA/Sky Harbor Air Service fuel area are inspected daily. A thorough inspection of both ASTs and fueling areas including documentation on the Inspection Forms provided in **Appendix C** "Inspection and Training Records" is conducted quarterly. Records of the inspections are maintained within the airport administration office for a minimum of three years.

- When loading and unloading operations occur at the Great Lakes Aviation and CRA/Sky Harbor Air Service USTs, the plug valves from the spill containment pads are to be closed.
- When loading and unloading operations are finished (all pumps shut down and pipes capped and the spill containment pad has been inspected and confirmed to be free of oil) the spill containment pad valve is to be reopened to allow rainwater to discharge.

5.2 Discharge and Drainage Controls – 40 CFR 112.7(a)(3)(iii)

A variety of secondary containment systems and procedures are used to control discharge and drainage events at the facility. Primary discharge and drainage control procedures are summarized below and described in Sections 8.1 and 9 of this plan.

- Secondary containment around AST-1 is in the form of a concrete dike tank, which will be maintained for control of potential discharges. Secondary containment areas will be inspected quarterly, at a minimum. Any shortcomings in the integrity of secondary containment controls or areas will be addressed by making the appropriate repairs or adjustments in operating procedures.
- Containment and/or diversionary structures or equipment will be maintained to prevent potential discharges from above ground piping or during loading/unloading operations from reaching navigable waters of the U.S. The containment and/or diversionary structures or equipment will be inspected quarterly, at a minimum. Any shortcomings in the integrity of the containment and/or diversionary structures or equipment will be addressed by making the appropriate repairs or adjustments in operating procedures.
- At all times when loading and unloading operations are occurring at the Great Lakes Aviation and CRA/Sky Harbor Air Services USTs, the manual plug valve controlling drainage from the spill containment pads shall be closed.

6.0 Emergency Discharge Procedures

This section of the SPCC plan outlines the emergency procedures to be followed in the event of a discharge.

6.1 Discharge History

No reportable oil discharge events have occurred at the facility during the twelve months prior to the effective date of this SPCC plan.

6.2 Discharge Discovery, Response And Clean-Up – 40 CFR 112.7(a)(3)(iv) and (a)(5)

The uncontrolled discharge of oil to groundwater, surface water or soil is prohibited by state and federal laws. Immediate action must be taken to control, contain and recover discharged product. For the Fuel Spill Response Procedures form (C-7), see **Appendix C**.

All employees and designated personnel should be alert to any discharge or leak of oil. If a discharge or leak of oil is noted, in general, the following steps are taken:

- Eliminate potential spark sources
- If possible and safe to do so
 - Identify and shut down source of the discharge to stop the flow
 - Determine size of discharge, rate of discharge and direction of flow

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- Contain the discharge with sorbents, berms, fences, trenches, sandbags or other material
 - Take appropriate action to limit access to the discharge
 - Contact the airport manager or his/her alternate
 - Contact regulatory authorities and the response organization
 - Collect and dispose of recovered products according to regulation

For the purpose of establishing appropriate response procedures, this SPCC plan classifies discharges as either “minor” or “major,” depending on the volume and characteristics of the material released.

6.2.1 Response to a Minor Discharge

A “minor” discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (e.g., may involve less than 5 gallons of oil)
- Discharged material is easily stopped and controlled at the time of the discharge
- Discharge is localized near the source
- Discharged material is not likely to reach water
- There is little risk to human health or safety
- There is little risk of fire or explosion

Minor discharges can usually be cleaned up by CRA or designated personnel. The following guidelines apply:

- Immediately notify the Airport Operations at (307) 638-3872 and the appropriate facility contact, Great Lakes Aviation –Jason Entner, Sky Harbor Air Service – Paul Martin
- Under the direction of the airport manager or his/her designated personnel, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers
- The airport manager or his/her designated personnel will complete the Discharge Notification Form (C-6) (**Appendix C**) and attach a copy to this SPCC plan
- Any discharge of 25 gallons or more of refined petroleum products (i.e. diesel, gasoline, Jet-A) or 420 gallons or more of unrefined petroleum product, that if not recovered, may cause pollution to navigable waters of the U.S., the Airport Manager or his designee should report immediately to the WYDEQ’s 24 hr notification number at (307) 777-7781.

6.2.2 Response to a Major Discharge

A “major” discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

-
- The discharge is large enough to spread beyond the immediate discharge area
 - The discharged material enters water
 - The discharge requires special equipment or training to clean up
 - The discharged material poses a hazard to human health or safety
 - There is a danger of fire or explosion

In the event of a major discharge, the following guidelines apply:

- If the airport manager is not present at the facility, the senior on-site person notifies the facility manager of the discharge and has authority to initiate notification and response.
- The airport manager or his designee (or senior on-site person) must call for medical assistance if workers are injured.
- The airport manager or his designee (or senior on-site person) must notify the Fire Department at 9-1-1 in an emergency or (307) 637-6311 for non-emergencies, the Police Department at 9-1-1 for emergencies or (307) 637-6500 for non-emergencies and the WYANG Crash Fire Rescue/Aircraft Rescue and Fire Fighting Team (ARFF) at (307) 772-6338 or 9-1-1.
- The airport manager or his designee must call the spill response and cleanup contractors listed in the Emergency Contacts list in Section 6.4 of this SPCC plan.
- If a harmful quantity of oil, as discussed in more detail in Section 1.1 of this report, has come into contact with a navigable water body, the airport manager or his designee must contact the USEPA National Response Center (800.424.8802) immediately.
- If hazardous materials are released in excess of the Emergency Planning and Community Right-to-Know Act (EPCRA) reportable quantities (40 CFR Part 355), the airport manager or his designee must contact the USEPA National Response Center or State Emergency Response Center at the numbers listed on the front cover of this document immediately.
- The airport manager or his designee must call the USEPA RA (800.227.8917) when a single discharge of 1,000 gallons or more occurs. Also contact the USEPA RA if two discharges of 42 gallons or more each occur within a 12-month period (see **Appendix C** for the notification form).
- The airport manager or his designee must record the call on the Discharge Notification Form in **Appendix C** and attach a copy to this SPCC plan.
- The airport manager or his/her designated coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

The incident commander, in accordance with the Airport Emergency Plan, is responsible for the coordination of response activities. The entity that caused the spill is responsible for the cleanup and removal of the material in a manner acceptable to the environmental regulatory agencies specified in this plan. The airport manager or his designee must be notified of the spill as soon as practical.

6.3 Oil Disposal – 40 CFR 112.7(a)(3)(v)

All oil, oil impacted soil and materials used during cleanup of a discharge must be disposed of in accordance with USEPA and WYDEQ regulations. Wastes resulting from a minor discharge response will be containerized in impervious bags, drums or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility in a timely manner by a licensed waste hauler.

Unique conditions might warrant pumping to transfer discharged oil into containers of appropriate size and construction or, if a major discharge occurs, into an oil tanker. Any contaminated soil and cleanup materials should be removed and disposed of in accordance with USEPA and WYDEQ regulations.

6.4 Emergency Contacts – 40 CFR 112.7(a)(3)(vi)

See the cover of this SPCC plan for a list of spill notification contacts. In the event of a release of more than 25 gallons of refined crude oil products, a call to the WYDEQ at (307) 777-7781 is required.

Numbers for clean-up contractors, supplies and equipment that may be utilized in the event of a discharge include, but are not limited to:

- a. Wyoming Air National Guard.
Crash Fire Rescue/ARFF
217 Dell Range Boulevard
Cheyenne, Wyoming 82009
(307) 772-6338 or 9-1-1 (advise dispatch of your location on the airport)
- b. Nelson-Clark Remediation, Inc.
2116 Dey Avenue
Cheyenne, Wyoming 82009
800.735.8969

These contractors have the necessary equipment to respond to a discharge of oil that may affect navigable waters of the U.S. or adjoining shorelines.

6.5 Discharge Reporting – 40 CFR 112.7(a)(4)

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters of the U.S. or adjoining shorelines must be reported immediately to the National Response Center (800.424.8802). The Center is staffed 24 hours a day.

A summary sheet is included in **Appendix C** to facilitate reporting. The person reporting the discharge must provide the following information:

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- Name, location, organization, and telephone number
 - Name and address of the party responsible for the incident
 - Date and time of the incident
 - Location of the incident
 - Source and cause of the release or discharge
 - Types of material(s) released or discharged
 - Quantity of materials released or discharged
 - Danger or threat posed by the release or discharge
 - Number and types of injuries (if any)
 - Media affected or threatened by the discharge (i.e., water, land, air)
 - Weather conditions at the incident location
 - Any other information that may help emergency personnel respond to the incident

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the USEPA RA whenever the facility discharges (as defined in 40 CFR 112.1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42 gallons of oil in each of two discharge incidents within a 12-month period. A complete copy of the information provided to the USEPA should also be forwarded to the WYDEQ. The following information must be submitted to the USEPA RA and to WYDEQ within 60 days:

- Name of the facility
- Name of the owner/operator
- Location of the facility
- Maximum storage or handling capacity and normal daily throughput
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements
- Description of facility, including maps, flow diagrams, and topographical maps
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred
- Additional preventive measures taken or contemplated to minimize possibility of recurrence
- Other pertinent information requested by the USEPA RA.

In addition to reporting requirements under SPCC regulation, if the spill volume is greater than 25 gallons for petroleum or poses a threat to human or environmental health, immediately report the spill to the WYDEQ.

However, if a spill is not determined to be reportable to the WYDEQ, the spill may require cleanup in accordance with the WYDEQ and/or federal requirements.

The same form can be used to report a spill to the USEPA, if necessary, as long as the information discussed above is provided. Please, refer to the Discharge Notification Form in **Appendix C** of the document. Verbal or written notification detailing the discharge will be performed and prepared for the WYDEQ by the facility manager or designee.

As the facility does not have a person on site 24 hours each day, a sign with the name, address, and telephone number of the facility owner, operator and/or local emergency response number is posted at the vehicle access point, near the perimeter of the facility. The sign provides information to allow non-airport personnel to contact appropriate emergency personnel in the event of a discharge or other emergency.

6.6 Discharge Response Procedures – 40 CFR 112.7(a)(5)

Please refer to Section 6.2 of this document and the Discharge Notification Form in **Appendix C** of this document.

7.0 Potential Tank and Equipment Failures – 40 CFR 112.7(b)

7.1 Bulk Fuel Storage

7.1.1 Generator Day tanks (AST-1 and AST-2)

| Potential Event | Volume Released | Spill Rate | Current Spill Direction |
|----------------------|-----------------------|--------------------------|---|
| Complete AST failure | Up to 2,000 gallons | Instantaneous | Spills from AST -1 would be contained within concrete dike. AST-2 contained within the Lighting Vault building. Once outside the building spills would flow to an access road, a vegetative buffer and north toward Dry Creek. The addition of secondary containment for AST-2 is discussed in Section 1.5. |
| Partial AST failure | Up to 2,000 gallons | Gradual to instantaneous | AST -1 would be contained within concrete dike. AST-2 contained within the Lighting Vault building. Once outside the building spills would flow to an access road, a vegetative buffer, and north toward Dry Creek. The addition of secondary containment for AST-2 is discussed in Section 1.5. |
| AST overfill | 1 to 40 at 20 gal/min | Gradual | AST -1 would be contained within concrete dike. AST-2 contained within the |

| | | | |
|--|--|--|---|
| | | | Lighting Vault building. Once outside the building spills would flow to an access road, a vegetative buffer, and north toward Dry Creek. The addition of secondary containment for AST-2 is discussed in Section 1.5. |
|--|--|--|---|

7.1.2 Unloading/Loading Areas (Great Lakes Aviation and CRA/Sky Harbor Air Service)

| Potential Event | Volume Released | Spill Rate | Current Spill Direction |
|---|---|--------------------------|---|
| Tank truck leak or failure inside containment pad | Depends on storage capacity of delivery truck | Instantaneous | Contained within the concrete spill pad |
| Tank truck leak or failure inside containment pad | Depends on storage capacity of delivery truck | Gradual to instantaneous | Contained within the concrete spill pad |
| Hose leak during truck loading/unloading | 1 to 100 | 20 gal/min | Contained within the concrete spill pad |

7.1.3 Above Ground Piping (Great Lakes Aviation and CRA/Sky Harbor Air Service)

| Potential Event | Volume Released | Spill Rate | Current Spill Direction |
|-------------------------|----------------------|--------------------------|---|
| Complete piping failure | 1 to several gallons | Instantaneous | Contained within the concrete spill pad |
| Partial piping failure | 1 to several gallons | Gradual to instantaneous | Contained within the concrete spill pad |

8.0 Containment, Inspections and Security Requirements

The following sections describe the containment and diversionary structures provided at the facility to minimize the potential of oil discharges to navigable waters of the U.S. The following sections also describe the procedures for personnel training for discharge prevention and measures in place for site security.

8.1 Containment and Diversionary Structures – 40 CFR 112.7(c)(1)

Methods of secondary containment at this facility include a combination of structures (e.g., dike, spill containment pad), drainage systems and land-based spill response (e.g., drain covers, sorbents) to prevent oil from reaching navigable waters of the U.S. and adjoining shorelines:

For bulk storage containers (refer to Section 10.2 of this Plan):

- Dike – AST-1 near the Air Traffic Control Tower is contained within a concrete berm able to contain the contents of the tank.
- AST-2 is located within the Lighting Vault building, on an impervious surface. Any minor leaks or spill would be contained within the building. However, a major spill has the potential to escape the building and run north downhill toward Dry Creek. The spill would have to pass over an access road and a vegetative buffer before entering Dry Creek. Airport personnel have access to the building and receive annual training on how to respond to the spill via the Airports' Pollution Prevention Plan.

At the loading/unloading area and other parts of the facility where a discharge could occur (refer to Section 8.6 of this Plan):

- Spill containment pads - The loading/unloading pads are pitched on all four sides toward the center trench drain. If a spill were to reach the drains, it would be directed to an oil-water separator before it is sent to the City of Cheyenne's BOPU Water and Sewer Department. The pad at the Sky Harbor Air Service has a storage capacity of approximately 8,000 gallons. The pad at Great Lakes Aviation has a storage capacity of approximately 10,000 gallons. The maximum tank truck capacity at the facility will be the fuel delivery truck with a capacity of 9,000 gallons.
- For purposes of this SPCC plan, the most reasonably expected source and cause of a discharge in the unloading areas is a ruptured hose connection. A driver or designated personnel are required to be present during loading/unloading operations. The refueler trucks at the facility can unload at a rate of 200 gpm and load at up to 450 gpm. Therefore, for a reasonably expected discharge scenario (hose rupture), maximum flow rates of 200 gpm and 450 gpm are assumed. All trucks are equipped with a manual emergency shut off valve at the back of each truck and a cable operated emergency shut off lever behind the driver side at the front of the tanks on the truck. In addition, an emergency shut off button is located on the fuel island. A hose rupture is not expected to impede an attendant's ability to reach an emergency shut off either on the fuel tanker truck or in the loading area. It is assumed the attendant can reach an emergency shut off within 30 seconds of a hose connection rupture. In

order to be conservative, a 60 second response time is assumed to account for possible delays to reach the shut off valve. Therefore, the maximum reasonably expected discharge from a hose rupture during unloading operations would be:

$$\text{ASTs: } (450 \text{ gal/min}) \times (1 \text{ min}/60 \text{ sec}) \times (60 \text{ sec}) = 450 \text{ gallons}$$

- Both the ASTs and USTs in this SPCC plan are part of suction systems. If the pipes rupture during use suction would be lost, therefore, only the small volume in the pipes would be expected to be released. A larger release could occur if a pipe breaks during loading of the USTs. The maximum flow through the above ground pipes would occur during loading. Therefore, for a reasonably expected discharge scenario, pipe rupture, a maximum flow rate of 250 gpm is assumed. A pipe rupture during the loading of the USTs is not expected to impede an attendant's ability to reach the manual valves to shut off flow through the pipes. It is assumed the driver can shut the manual valves and thereby stop flow through the pipe within 30 seconds of a pipe rupture. In order to be conservative, a 60 second response time is assumed to account for possible delays to reach the shut off. Therefore, the maximum reasonably expected discharge from a pipe rupture would be:

$$(250 \text{ gal/min}) \times (1 \text{ min}/60 \text{ sec}) \times (60 \text{ sec}) = 250 \text{ gallons}$$

- Based on the location of the above ground piping and the loading areas, adequate secondary containment and diversionary structures would be able to contain a release at the loading/unloading area and prevent a discharge as described in 40 CFR 112.1(b).

8.2 Demonstration of Practicability – 40 CFR 112.7(d)

Facility management has determined that use of the containment and diversionary structures or readily available equipment to contain discharged oil is practical and effective at this facility.

8.3 Inspections, Tests, and Records – 40 CFR 112.7(e)

As required by the SPCC rule, the CRA and its lessees perform the required inspections, tests, and evaluations. The following table summarizes the various types of inspections and tests performed at the facility.

| Facility Component | Action | Frequency/Circumstances |
|------------------------|--|--|
| Above ground container | Test container integrity. Combine visual inspection with equivalent environmental protection measures. Inspect outside of container for signs of deterioration and discharges. | Following a regular schedule (Quarterly, annual, and during scheduled inspections) and whenever material repairs are made. |
| USTs | Test container integrity. Combine visual inspection with equivalent environmental protection measures. | Following a regular schedule (Quarterly, annual, and during scheduled inspections) and whenever material repairs are made. |

| Facility Component | Action | Frequency/Circumstances |
|--|---|--|
| Container supports and foundation | Inspect container's supports and foundations | Following a regular schedule (Quarterly, annual, and during scheduled inspections) and whenever material repairs are made. |
| Sight gauges on ASTs (overfill) | Evaluate for proper operation | Quarterly |
| Diked areas | Inspect for signs of deterioration, discharges, or accumulation of oil inside diked areas | Quarterly |
| | Visually inspect content for presence of oil | Prior to draining |
| Lowermost drain and all outlets of tank trucks | Visually inspect | Prior to filling and departure |
| All above ground valves, piping, and appurtenances | Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces | Quarterly |

8.3.1 Daily Inspection

A CRA employee or other designated personnel will perform a walk-through of the petroleum storage areas each day. This daily visual inspection involves looking for tank/piping damage or leakage, stained or discolored soils or vegetation, or excessive accumulation of water in spill containment pads, diked and/or bermed areas and to ensure drain valves are closed. This inspection of fuel facilities is a Federal Aviation Administration (FAA) requirement, 14 CFR Part 139.327.

8.3.2 Quarterly Inspection

14 CFR Part 139 requires quarterly inspections of all fuel facilities. Quarterly visual inspections consist of a walk through at the facility to check for equipment and piping damage or leakage, stained or discolored soils or vegetation, and excessive accumulation of water in containment areas. The quarterly inspection does not need to be completed during the month of the annual inspection.

The Quarterly Inspection Form (C-1) provided in **Appendix C** will be used during quarterly inspections covering the following key elements:

- Observing the exterior of ASTs, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing the exterior of portable containers, if any, for signs of deterioration or leaks.
- Observing tank foundations and supports for signs of instability or excessive settlement.

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- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge and tank vent for obstructions and proper operation.
 - Verifying the proper functioning of overflow prevention systems. Depending on the system being used (ball float valve, drop tube shutoff or electronic alarm), the device should be removed and visually inspected for damage or corrosion. The tube or valve should be checked to make sure it's at the proper height within the tank or if an alarm is being used, ensure the device functions correctly by causing an alarm condition (submerging in fluid).
 - Checking the inventory of discharge response equipment and restocking as needed.
 - Verifying the physical security of the facility.
 - Checking deadman controls, fire extinguishers, markings for cutoffs and the explosion proof electrical equipment.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the facility manager. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters of the U.S. or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written quarterly inspections are performed in accordance with written procedures developed for the facility. Written inspection procedures and quarterly inspections are signed by the inspector and maintained for a minimum period of three years with this SPCC plan or under usual and customary business practices.

8.3.3 Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the Quarterly inspection described above and is performed in July of each year using the Annual Inspection Form (C-2) provided in **Appendix C** of this plan.

The annual inspection is preferably performed after a large storm event in order to verify the imperviousness and/or proper functioning of drainage control systems such as the spill containment pads, dike and control valves.

Written annual inspection records are signed by the inspector and maintained for a minimum period of three years with this SPCC plan or under usual and customary business practices.

8.4 Personnel Training and Discharge Prevention – 40 CFR 112.7(f)

Management instruct oil handling personnel in the contents of this SPCC plan, the operation and maintenance of oil discharge response equipment and pollution control laws and regulations. New employees shall receive spill prevention training as part of their initial training in plant operation if they will have oil-handling duties. Great Lakes Aviation and Sky Harbor Air Service conduct training sessions and their training programs are periodically reviewed by CRA personnel to ensure the proper subject matter is covered.

Both entities that have personnel involved in oil-handling duties annually review the SPCC plan.

David Haring, Airport Manager, is accountable for oil spill prevention at this facility.

Discharge prevention meetings are conducted annually to assure understanding of this SPCC Plan. The record of Discharge Prevention Meetings and Training Form (C-3) in **Appendix C** may be used for this purpose. Meetings and training sessions must highlight and describe known discharges, failures, malfunctioning components, and any recently developed precautionary measures. Personnel are encouraged to offer suggestions that would be beneficial to spill prevention.

Instructions and phone numbers regarding the reporting of a spill to the National Response Center and the WYDEQ are posted in the airport office as well as each of the lessee's offices and also in each tank transport vehicle.

8.5 Security – 40 CFR 112.7(g)

The CRA property is surrounded by a fence with limited, controlled access points.

All access points to the USTs (i.e. dispenser's cabinets, fill port covers) are locked when not in use or not being operated.

The facility is lit by security lights during non-daylight hours to assist in the discovery of discharges at night and as a method of vandalism prevention.

The UST loading and unloading areas at Great Lakes Aviation and Sky Harbor Air Service are operated during the following business hours (Mon-Sun, 6:00am – 10:00pm) but can be accessed by appropriate personnel 24 hours a day.

The loading and unloading connections of all pipelines are capped when not in service or when in standby service for an extended time.

8.6 Facility Tank Truck Unloading – 40 CFR 112.7(h)

The potential for discharges during tank truck loading and unloading operations is of particular concern at this facility. The following measures are implemented to prevent oil discharges during tank truck loading and unloading operations.

8.6.1 Secondary Containment (40 CFR 112.7(h)(1))

The facility has a loading/unloading spill containment pad (where product is unloaded from large capacity tanker trucks to the facility storage tanks and from storage to refueler trucks). One is located next to the dispenser cabinet at Great Lakes Aviation and the other adjacent to the fuel farm.

The spill containment pads are pitched on all four sides toward the center to provide secondary containment in the event of a discharge during transfer operations. The secondary containment pad is designed to address the more stringent rack containment requirements of 40 CFR 112.7(h), which requires that the containment area be sufficient to contain the capacity of the largest

compartment, plus freeboard for precipitation. The pad at the CRA/Sky Harbor Air Service has a storage capacity of approximately 8,000 gallons. The pad at Great Lakes Aviation has a storage capacity of approximately 10,000 gallons. The maximum size tanker truck capacity at the facility will be the fuel delivery truck, which will have a total capacity of 9,000 gallons with compartment sizes no larger than 4,500 gallons.

8.6.2 Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation (US DOT). The company accepting the fuel at the time of delivery has reviewed this SPCC plan to ensure duties are performed in accordance with the SPCC plan. A copy of the SPCC plan is made available to fuel vendors so that they understand the site layout, know the protocol for entering the facility and unloading product and have the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose.

The airport manager or his designee periodically observes fuel deliveries for existing, approved and new suppliers.

Vehicle filling operations are performed by facility personnel trained in proper discharge prevention procedures. The truck driver or facility personnel remain with the vehicle at all times while fuel is being transferred.

Great Lakes Aviation and Sky Harbor Air Service maintain a set of wheel chocks and all suppliers also carry sets of wheel chocks on their trucks. Chock blocks are utilized at the loading/unloading area during all transfer operations to prevent premature vehicular departure.

All outlets on tank trucks are inspected prior to filling and departure to prevent a liquid discharge while in transit.

8.7 Field Constructed Tanks – 40 CFR 112.7(i)

There are no field constructed tanks under this SPCC plan.

8.8 Additional Requirements – 40 CFR 112.7(j)

Upon completion of the items listed in Section 1.5 of this document, the fueling areas will be in conformance with the SPCC discharge prevention requirements in effect at the time this SPCC Plan was prepared.

In addition to SPCC requirements, the State of Wyoming and USEPA have spill reporting requirements. Please refer to Sections 6.2 and 6.5 of this report for more detail regarding the requirements. However, the information provided in this SPCC Plan is not intended to be complete for any regulatory requirements other than 40 CFR 112. Refer to State of WYDEQ Regulations and other applicable Federal regulations to insure compliance with all State and Federal requirements.

The WYDEQ has regulatory responsibility for the permitting, registration, and inspection of ASTs. Inspection of the ASTs should be in accordance with these requirements.

9.0 Facility Drainage – 40 CFR 112.8(b)

The following sections describe how facility drainage is managed to minimize the potential of oil discharges to navigable waters of the U.S.

9.1 Diked Areas – 40 CFR 112.8(b)(1)

Drainage from the containment dike around AST-1 is conducted on an as needed basis by manually pumping the water to the ground surface using a submersible sump pump. Water from the dike is visually inspected for the presence of a sheen or free product prior to discharge. Although this concrete dike rarely needs pumped, records are kept of drainage events (refer to Dike or Containment Areas Drainage Log (C-5) in **Appendix C**).

9.2 Drainage Valves – 40 CFR 112.8(b)(2)

A drain valve is connected to the spill containment pads constructed at the UST fuel areas. When opened the contents of the containment dike drain to a grass surface. The spill containment pad at Great Lakes Aviation drains into a drainage ditch. The spill containment pad at CRA/Sky Harbor Air Service drains on to the Tarmac which is sloped towards an open grass area approximately 200 feet to the northeast.

9.3 Undiked Area Drainage – 40 CFR 112.8(b)(3)

AST-2 is located within the Lighting Vault building and does not have secondary containment. Any spills that would exit the building would flow north downhill toward Dry Creek. There are no other undiked areas with a significant potential for discharge.

9.4 Diversion System – 40 CFR 112.8(b)(4)

There are no ditches inside the facility that would require a diversion system.

9.5 Facility Drainage Systems – 40 CFR 112.8(b)(5)

No drainage water meeting the definition of 40 CFR 112.8(b)(5) is present at the facility.

10.0 Bulk Storage Tanks – 40 CFR 112.8(c)

The ASTs onsite are:

1. One 2,000 gallon AST generator day tank containing diesel.
2. One 2,000 gallon AST generator day tank containing diesel and gasoline in separate compartments.

10.1 Tank Compatibility – 40 CFR 112.8(c)(1)

All tanks utilize materials and construction that are compatible with the oils they contain and the conditions of storage. Piping between the USTs and the dispensing cabinets is made of steel and placed above ground on appropriate supports designed to minimize corrosion.

10.2 Tank Secondary Containment – 40 CFR 112.8(c)(2)

Means of secondary containment are provided for the AST-1 and loading/unloading operations at the facility (mobile refuelers are exempt from requirement).

-
1. AST-1 is located within a concrete dike that provides an area for secondary containment. The containment area is sized to contain the entire contents of the largest AST, plus approximately 10% freeboard allowance for precipitation.
 2. The spill containment pads are pitched on all four sides toward the center to provide secondary containment in the event of a discharge during transfer operations. The pad at the Sky Harbor Air Service has a storage capacity of approximately 8,000 gallons. The pad at Great Lakes Aviation has a storage capacity of approximately 10,000 gallons. The maximum size tanker truck capacity at the facility will be the fuel delivery truck, which will have a total capacity of 9,000 gallons with compartment sizes no larger than 4,500 gallons.

10.3 Rainwater Drainage – 40 CFR 112.8(c)(3)

Drainage from the AST containment dike is conducted on as needed basis by manually pumping the water to the ground surface using a submersible sump pump. Water from the dike is visually inspected for the presence of a sheen or free product prior to discharge. Although the AST containment dike rarely is drained, records are kept of drainage events (refer to Dike or Containment Areas Drainage Log (C-5) in **Appendix C**).

10.4 Buried Metallic Storage Tanks – 40 CFR 112.8(c)(4)

Please refer to Section 4.1.4 of this document.

10.5 Partially Buried Metallic Storage Tanks – 40 CFR 112.8(c)(5)

There are no partially buried metallic storage tanks at the facility.

10.6 Tank Testing – 40 CFR 112.8(c)(6)

Each of the ASTs will be visually inspected quarterly for evidence of leaks at the tanks and associated piping. The inspection will include a general evaluation of the integrity of the tanks and will be documented on the Quarterly Inspection Form (C-1) provided in **Appendix C**.

The CRA is deviating from the bulk storage container integrity testing provision of 112.8(c)(6) for the ASTs. The deviation is based on good engineering practice after considering the age and installation of the tanks, tank integrity testing requirements, and alternative measures implemented by the facility. The ASTs are all shop built containers with shell capacities less than 30,000 gallons. One of the ASTs is in a properly sized concrete secondary containment area and the other is contained within the Lighting Vault building. Both of the ASTs are on an impervious concrete surface and do not have contact with the soil.

The tanks and containment areas are inspected regularly (as described in Section 8.3) by trained personnel knowledgeable of storage facility operations, characteristics of the liquids stored, the construction of the ASTs and piping, and the secondary containment system. The scope of the inspections and procedures for addressing any deficiencies or concerns identified during an inspection is covered in the training provided to oil handling personnel at the facility. The routine inspections focus specifically

on detecting any change in conditions or signs of product leakage from the ASTs, piping or appurtenances.

The physical configuration of the AST combined with the periodic inspections, ensures that any leakage from either of the ASTs would be detected visually before it can become significant, escape secondary containment or the Lighting Vault building, and reach the environment. This approach provides environmental protection equivalent to the non-destructive shell evaluation component of integrity testing required under 112.8(c)(6) since it provides an appropriate and effective means of assessing the condition of the ASTs and their suitability for continued service.

10.7 Internal Tank Heating Coils – 40 CFR 112.8(c)(7)

There are no internal tank heating coils within any of the tanks at the CRA property.

10.8 Good Engineering Practices – 40 CFR 112.8(c)(8)

Facility personnel are present during part of the filling, unloading and loading operations to monitor product level in the tanks and tanker trucks.

10.9 Plant Effluents – 40 CFR 112.8(c)(9)

There are no effluent treatment systems at the tank facility and no effluent discharge to a surface water or soil.

10.10 Visible Oil Discharges – 40 CFR 112.8(c)(10)

Oil leaks which result in a loss of oil from tank seams, gaskets, piping, pumps, valves, rivets and bolts will be promptly corrected. Depending on the volume, accumulations of oil in diked areas will be promptly removed using sorbent materials or pumped. Recovered oil and sorbent materials will be stored in 55-gallon drums and will be disposed of in accordance with applicable regulations.

10.11 Mobile or Portable Tanks – 40 CFR 112.8(c)(11)

Drums will be stored on containment pallets or in another manner that provides adequate secondary containment. The mobile refuelers that are used at the CRA are exempt from the requirements of 40 CFR 112.8(c)(11).

11.0 Facility Transfer Operations, Pumping, and Facility Process – 40 CFR 112.8(d)

The transfer of fuel at the facility, as it pertains to SPCC requirements, is through above ground piping. The following section describes how the transfer of fuel is handled at the facility.

11.1 Underground Piping – 40 CFR 112.8(d)(1)

No underground piping, as it pertains to SPCC requirements, exists at the facility.

11.2 Out of Service Piping – 40 CFR 112.8(d)(2)

Pipelines not in service for an extended period of time will be capped and marked as to their origin or permanently removed.

11.3 Piping Supports – 40 CFR 112.8(d)(3)

Pipe supports are constructed of steel and anchored to a concrete foundation. Each pipe support is adjustable to allow expansion and contracting of the piping. The pipe supports are coated to prevent corrosion of the steel.

11.4 Valve and Piping Inspections – 40 CFR 112.8(d)(4)

All above ground pipelines and valves are regularly inspected to assess their condition. Inspection includes above ground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Results of the inspections are recorded on the inspection logs provided in **Appendix C**.

11.5 Vehicle Warnings – 40 CFR 112.8(d)(5)

Approximately 25-feet of above ground piping is located between the fuel loading pad and the AST secondary containment dike at the CRA/Sky Harbor Air Service fuel area. Above ground piping at the CRA/Sky Harbor Air Service fuel area and the dispenser cabinet at the Great Lakes Aviation Fueling area are protected from vehicular impact by the spill containment pad and curbing.

12.0 Non-Applicable Portions of the SPCC Regulations

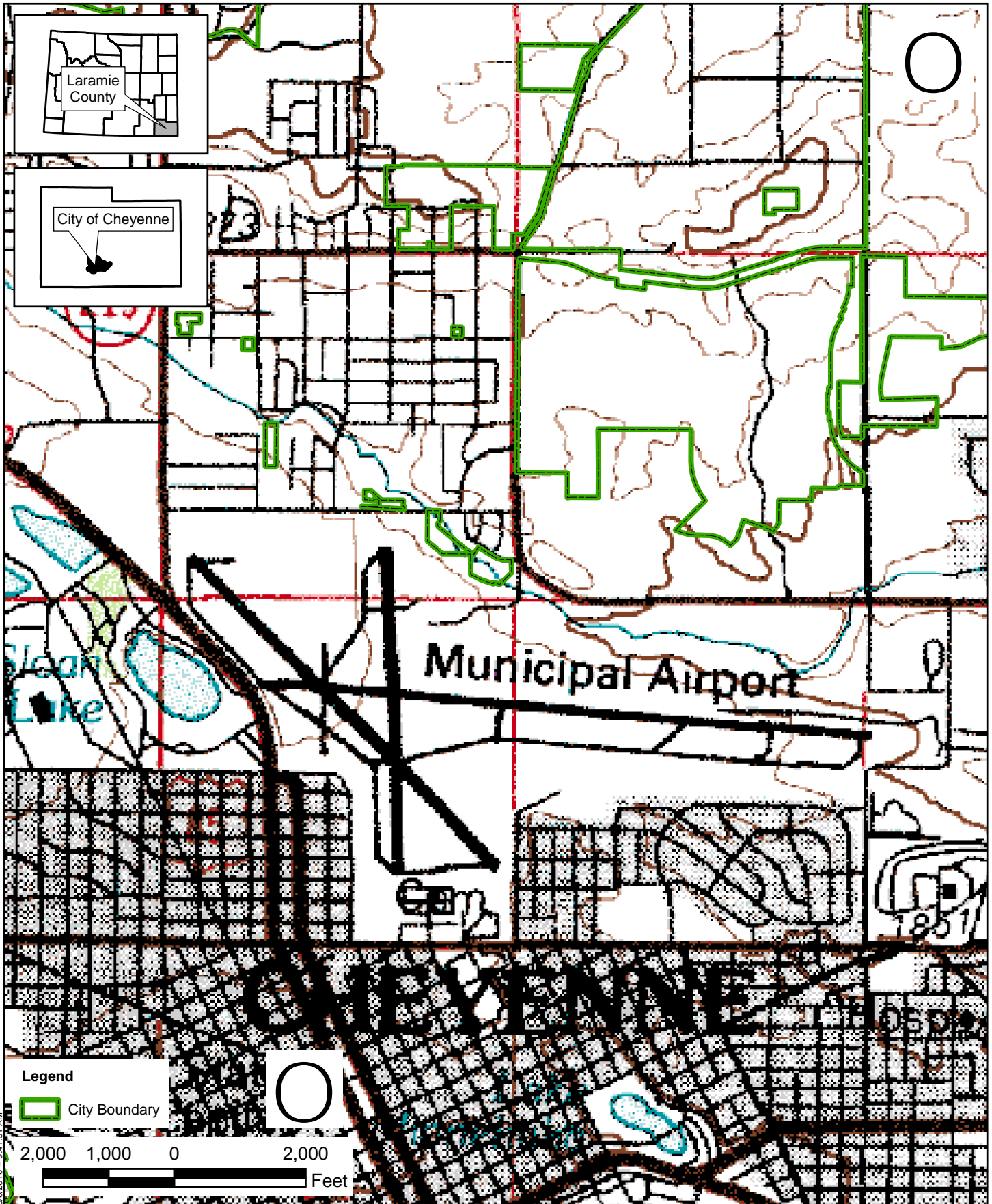
The following portions of the SPCC regulations have been determined to not be applicable to the facility:

- **40 CFR 112.9:** Spill Prevention, Control, and Countermeasure Plan requirements for onshore oil production facilities
- **40 CFR 112.10:** Spill Prevention, Control, and Countermeasure Plan requirements for onshore oil drilling and workover facilities
- **40 CFR 112.11:** Spill Prevention, Control, and Countermeasure Plan requirements for offshore oil drilling, production, or workover facilities
- **Subpart C** – Requirements for Animal Fats and oils and Greases, and Fish and Marine Mammal Oils; and for Vegetable Oils, including Oils from Seeds, Nuts, Fruits, and Kernels
- **Subpart D** – Response Requirements

List of Figures

Figure 1 – Location Map

Figure 2 – Layout Plan



Map Document: (S:\AE\Cheya\112087\GIS\Maps\SPCC\Fig01_Location\Map.mxd)
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PHONE: (651) 490-2000
FAX: (651) 490-2150
WATTS: 800-325-2055
www.sehinc.com

Project: CHEYA 112087
Print Date: 08/06/2010
Map by: SH
Projection: UTM Zone 13 NAD83
Source: State of Wyoming, USGS,
Microsoft Virtual Earth, and SEH Inc.

Location Map
Cheyenne Regional Airport SPCC Plan
Cheyenne, Wyoming

Figure
1

This map is neither a legally recorded map nor a survey map and is not intended to be used as one. This map is a compilation of records, information, and data gathered from various sources listed on this map and is to be used for reference purposes only. SEH does not warrant that the Geographic Information System (GIS) Data used to prepare are error free, and SEH does not represent that the GIS Data can be used for navigational, tracking, or any other purpose requiring exacting measurement of distance or direction or precision in the depiction of geographic features. The user of this map acknowledges that SEH shall not be liable for any damages which arise out of the user's access or use of data provided.

Appendix A

Certification of the Applicability of the Substantial Harm Criteria Checklist (C-II Form)

Certification of the Applicability of the Substantial Harm Criteria Checklist

Facility Name: Cheyenne Regional Airport

Address: 4000 Airport Parkway, Cheyenne, WY

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 above ground oil storage tank plus sufficient freeboard to allow for precipitation within any above ground 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, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.
YES _____ NO X

4. Does the facility have a total 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, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?
YES _____ NO X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
YES _____ NO X

CERTIFICATION

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

Signature

Title

Name (Please type or print)

Date

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

²For the purpose of 40 CFR part 112, public drinking water makers are analogous to public water systems as described at 40 CFR 142.2(c).

Appendix B

- B-1 WYDOT SPCC Plan
- B-2 NWS SPCC Plan
- B-3 WYANG SPCC Plan

Appendix C

Inspection and Training Records

C-1 - Quarterly Inspection Form

C-2 - Annual Inspection Form

C-3 - Discharge Prevention Meetings and Training Form

C-4 - SPCC Training Guidelines Fuel Service

C-5 - Dike or Containment Areas Drainage Log

C-6 Discharge Notification Form

C-7 Fuel Spill Response Procedures

C-1

Quarterly Inspection Form

Inspections are to be performed quarterly (except the month in which an annual inspection is performed) by qualified personnel via a thorough visual inspection of the facility and appropriate oil storage areas.

Inspection Procedures

1. Only the airport manager or designated personnel with SPCC training shall conduct Quarterly inspections.
2. Inspections shall be conducted during sufficient light conditions and necessary equipment (ladders, flashlights, safety gear) shall be provided to allow inspection of difficult to access areas.
3. Results of the inspections are to be documented on the following form or equivalent provided by the Cheyenne Regional Airport. Abnormalities shall be clearly stated on the form and the facility manager shall be notified. If necessary, attach additional comments to form.
4. Each inspection form shall be signed by the inspector, or facility manager, and maintained with the SPCC Plan for a minimum of three years.

INSPECTOR: _____

DATE: _____

Visual Inspection

YES OR NO

- | | |
|--|-------|
| 1. Container Inspection (ASTs, Piping) | |
| a) Paint blistering | _____ |
| b) Rust on container or piping | _____ |
| c) Paint discoloration | _____ |
| d) Sign of leakage around container perimeter | _____ |
| e) Odors | _____ |
| f) Dead or dying vegetation | _____ |
| g) Bolts, rivets, or seams damaged | _____ |
| h) Vents are obstructed | _____ |
| i) Surface Stains | _____ |
| j) Heating coil seals | _____ |
| 2. Foundations | |
| a) Cracks or corrosion | _____ |
| b) Discoloration | _____ |
| c) Signs of settling | _____ |
| 3. 55 gallon drums or other oil storage containers (if applicable) | |
| a) Paint blistering | _____ |
| b) Corrosion | _____ |
| c) Sign of leakage around containers | _____ |
| d) Seams damaged | _____ |
| e) Containers tightly closed | _____ |

C-2

Annual Inspection Form

Inspections are to be performed annually by qualified personnel via a thorough visual inspection of the facility and appropriate oil storage areas.

Inspection Procedures

1. Only the airport manager or designated personnel with SPCC training shall conduct annual inspections.
2. Inspections shall be conducted during sufficient light conditions and necessary equipment (ladders, flashlights, safety gear) shall be provided to allow inspection of difficult to access areas.
3. Results of the inspections are to be documented on the following form or equivalent provided by the Cheyenne Regional Airport. Abnormalities shall be clearly stated on the form and the facility manager shall be notified. If necessary, attach additional comments to form.
4. Each inspection form shall be signed by the inspector, or facility manager, and maintained with the SPCC Plan for a minimum of three years.

INSPECTOR: _____

DATE: _____

| | Y* | N | Description & Comments |
|----------------------|----|---|--|
| Storage tanks | | | |
| AST-1 | | | |
| | | | <i>Tank surfaces show signs of leakage</i> |
| | | | <i>Tank is damaged, rusted or deteriorated</i> |
| | | | <i>Bolts, rivets or seams are damaged</i> |
| | | | <i>Tank supports are deteriorated or buckled</i> |
| | | | <i>Tank foundations have eroded or settled</i> |
| | | | <i>Level gauges or alarms are inoperative</i> |
| | | | <i>Vents are obstructed</i> |
| AST-2 | | | |
| | | | <i>Tank surfaces show signs of leakage</i> |
| | | | <i>Tank is damaged, rusted, or deteriorated</i> |
| | | | <i>Bolts, rivets, or seams are damaged</i> |
| | | | <i>Tank supports are deteriorated or buckled</i> |
| | | | <i>Tank foundations have eroded or settled</i> |
| | | | <i>Level gauges or alarms are inoperative</i> |

| | Y* | N | Description & Comments |
|---|----|---|------------------------|
| <i>Vents are obstructed</i> | | | |
| Concrete dike | | | |
| <i>Secondary containment is stained</i> | | | |
| <i>Dike walls or floors are cracked or are separating</i> | | | |
| <i>Dike is not retaining water (following large rainfall)</i> | | | |
| Piping | | | |
| <i>Valve seals or gaskets are leaking</i> | | | |
| <i>Pipelines or supports are damaged or deteriorated</i> | | | |
| <i>Joints, valves and other appurtenances are leaking</i> | | | |
| <i>Out-of-service pipes are not capped</i> | | | |
| <i>Warning signs are missing or damaged</i> | | | |
| Loading/unloading and transfer equipment (Great Lakes Aviation) | | | |
| <i>Loading/unloading equipment is damaged or deteriorated</i> | | | |
| <i>Spill containment pad is stained or cracked</i> | | | |
| <i>Connections are not capped or blank-flanged</i> | | | |
| <i>Rollover berm is damaged or stained</i> | | | |
| Loading/unloading and transfer equipment (Sky Harbor Air Services) | | | |
| <i>Loading/unloading equipment is damaged or deteriorated</i> | | | |
| <i>Spill containment pad is stained or cracked</i> | | | |
| <i>Connections are not capped or blank-flanged</i> | | | |
| <i>Rollover berm is damaged or stained</i> | | | |
| Security | | | |
| <i>Fencing or lighting is non-functional</i> | | | |
| <i>Pumps and valves are not within a secure area</i> | | | |
| Response equipment | | | |
| <i>Response equipment inventory is incomplete</i> | | | |

Annual reminders:

Hold SPCC Briefing for all oil-handling personnel (and update briefing log in the Plan)

Check contact information for key employees and response/cleanup contractors and update them in the Plan as needed

Remarks _____

C-3

Record of Discharge Prevention Briefings and Trainings

Instructions: Briefings will be scheduled and conducted by the owner or operators for operating personnel at intervals frequent enough to assure adequate understanding of the SPCC plan for this facility. These briefings should highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Personnel shall be instructed in operation and maintenance of equipment to prevent the discharge of oil and in the applicable pollution control laws, rules, and regulations. During these briefings there will be an opportunity for facility operators and other personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the facility.

Date: _____

Attendees:

| Name (Print) | Signature |
|--------------|-----------|
| | |
| | |
| | |
| | |
| | |
| | |
| | |

Subjects and Issues: _____

Recommendations and Suggestions: _____

C-4

SPCC Training Guidelines Cheyenne Regional Airport

Schedule

SPCC training will be provided according to the following schedule, at a minimum:

- Upon completion of initial SPCC Plan or plan updates for appropriate personnel;
- Immediately upon hire for new employees; and
- Annually for appropriate personnel.

Training Outline

The following outline is a guidance of subjects for SPCC training briefings.

- Advise personnel that everyone is responsible for spill prevention;
- Describe procedures for spill prevention;
- Discuss the importance of precautionary measures;
- Describe procedures for fueling vehicles;
- Describe procedures for loading/unloading tanks;
- Describe spill containment and control for each tank;
- Describe spill containment and control for tank truck loading/unloading;
- Describe procedures for containing spills;
- Describe use and location of spill control equipment i.e. booms, socks, absorbents, oil dry;
- Advise personnel that everyone is responsible for spill reporting and clean up. All spills shall be addressed per the Emergency Spill Response Plan for the facility;
- Describe spill reporting and clean-up procedures;
- Advise personnel that if a reportable quantity of product is spilled, appropriate agencies must be notified;
- If a spill has occurred, review the history and cause of the spill and identify how the spill could have been avoided;
- Discuss with personnel the importance of ensuring tanks have secondary containment that is maintained in good condition and repaired as necessary;
- Discuss Quarterly tank inspections and identify responsibilities;
- Instruct personnel to report any required repairs to tanks, pumps, and piping to their supervisor immediately;
- Report all repairs, upgrades, additions, and changes completed to the facility manager so that the SPCC Plan can be updated; and
- Discuss site security measures such as locking gates and valves and shutting off power to pumps

C-5
Dike or Containment Areas Drainage Log

Date: _____ Time: _____

Standing water found to be free of oil contamination (**yes/no**): _____

Drainage performed by: _____ Title: _____

Containment area drained: _____

Method used for draining: _____

Date: _____ Time: _____

Standing water found to be free of oil contamination (**yes/no**): _____

Drainage performed by: _____ Title: _____

Containment area drained: _____

Method used for draining: _____

Date: _____ Time: _____

Standing water found to be free of oil contamination (**yes/no**): _____

Drainage performed by: _____ Title: _____

Containment area drained: _____

Method used for draining: _____

Date: _____ Time: _____

Standing water found to be free of oil contamination (**yes/no**): _____

Drainage performed by: _____ Title: _____

Containment area drained: _____

Method used for draining: _____

C-6

Discharge Notification Form

Requirements for notification, as established in the basic regulation, request the following information in the event of a pollution incident in which immediate corrective actions are required:

1. Name, location, organization, and telephone number of installation: _____

2. Date & time of incident: _____
3. Severity of incident. Specify degree (serious, minor) of potential or actual threat to: human life; property; or plant or animal life: _____

4. Location of incident and the nature of terrain at the location to include surface & subsurface drainage characteristics and relationships to water bodies (estimate extent of area affected such as miles of stream or acres of lake): _____

5. Source and cause of discharge: _____

6. Type and estimate amount (barrels, gallons, lbs) of pollutant: _____
7. Damage impact on surrounding media including fish and wildlife. Include type of fish or wildlife affected and estimate number killed: _____

8. Corrective action to eliminate pollution source: _____

 - a. Corrective action to remove pollutant: _____

9. Assistance required: _____
10. Estimated completion date of remedial action: _____
11. Anticipated or actual reaction by the news media and public reaction to the incident. Specify potential for liability: _____

12. Regional Environmental Protection Agency or US Coast Guard Office notified/or statement that notification was not required: _____

13. Weather conditions: _____

C-7

Fuel Spill Response Procedures

Anyone involved in a spill involving fuel or oil that is not easily controllable with equipment and materials at hand should take initial action to reduce or eliminate any threat to the safety of people and to minimize or eliminate potential damage to property and equipment, if it is possible to do so quickly and without jeopardizing their own safety.

Step 1: Immediate Response

- For fuel spills, if material is continuing to be released and it is safe to do so, eliminate the source of the spill.
- Immediately warn everyone in the immediate area of the spill.
- Evacuate the immediate area of the spill.
- Eliminate sources of ignition by shutting down electrical power and turning off running equipment outside the area of the spill. However, do not turn off or move running equipment within the spill area.
- Notify supervisor. The supervisor shall make the proper notifications immediately: Cheyenne Regional Airport (307) 638-3872, Wyoming Air National Guard Base Fire Department (911), WYDEQ (307) 777-7781 and the USEPA RA (800) 227-8917 if the spill is of reportable size.
- For all spills: Cover, plug or pour enough absorbent around drains or grass areas to stop the flow of fuel into them.

Step 2: Notifications

Report as much of the following information as possible to emergency response:

- Whether anybody is injured
- Location of the incident
- Whether the danger of fire, explosion or injury exists.
- Type and amount of material released.
- Whether fuel is continuing to be released.

When the Fire Department arrives, they are in charge and no actions are to take place without their approval.

Step 3: Assess appropriate cleanup measures

If the spill is beyond the capabilities of internal cleanup measures, Management may contact Nelson-Clark Remediation, Inc. (800)735-8969 or another local contractor for cleanup assistance.

Step 4: Continue containment and initiate cleanup

Once the Fire Department says it is safe to do so:

- Ensure storm drains and grass areas have been protected via covering or berming around drains with absorbent or booms.
- Construct dams of absorbent material to restrict flow of the spilled liquid.
- Initiate cleanup of spill.